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# Pathways to Accountability

## A short guide to the GAP Framework

Monica Blagescu, Lucy de Las Casas and Robert Lloyd

**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.

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.



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# Pathways to Accountability

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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 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](mailto:accountability@oneworldtrust.org)

# Accountability

***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 of 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 relationship, in which the voices of those most affected by an organisation's activities are not overshadowed by the interests of the most powerful. 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.

**Stakeholders:** Individuals and groups that can affect or are affected by an organisation's policies.

- *internal stakeholders* – individuals or groups that are formally part of the organisation
- *external stakeholders* – individuals or groups who are affected by an organisation's decisions and activities but who are not formally part of the organisation.

	IGOs	TNCs	INGOs
<b>Internal stakeholders</b>	Members Employees Board of Directors	Shareholders Employees Board of Directors	National members/chapters Employees Trustees
<b>External stakeholders</b>	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

Organisations cannot be equally accountable to all groups at all times – this would lead to accountability paralysis. Key stakeholder groups need to be prioritised taking into account the following factors: 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 degree to which the needs and interests of stakeholders who do not have the power to influence the organisation should be taken into account because they are integral to a specific project or key to the organisation's success. Failure to view influence in this way will have adverse effects by reinforcing accountability systems already skewed 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.

# The GAP Framework

The GAP framework unpacks accountability into four dimensions: transparency, participation, evaluation, and complaint and response mechanisms. These enable an organisation to give an account to, take account of, and be held to account by, stakeholders; and are a reflection of an organisation's proactive or reactive approach to accountability. To be accountable, an organisation needs to integrate all dimensions into its policies, procedures and practice, at all levels and stages of decision-making and implementation, in relation to key stakeholders.

## Transparency

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

Transparency refers to an organisation's openness about its activities: the extent to which it provides 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 not only refers to the organisation giving an account to stakeholders, it also encompasses responding to their requests for information. It is about providing stakeholders with the information they need in order to engage in the decisions that affect them. Transparency is not a one-way flow of information, but an ongoing dialogue between organisation and stakeholders over information provision.

## 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.***

To be accountable, an organisation needs to understand the needs and interests of key stakeholders. This is best achieved through engagement and a participatory approach to decision-making. The organisation 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.

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. Participation refers to the organisation taking account of its stakeholders and enabling them to have a say in how and what decisions are made.

## Evaluation

***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 ensures that an organisation both learns from, and is accountable for, its performance; that it is achieving goals and objectives and meeting agreed standards. Evaluation allows an organisation to give an account of performance and impact, enabling stakeholders to hold it to account for what it said it would achieve.

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 goals and objectives.

## Complaint and response mechanisms

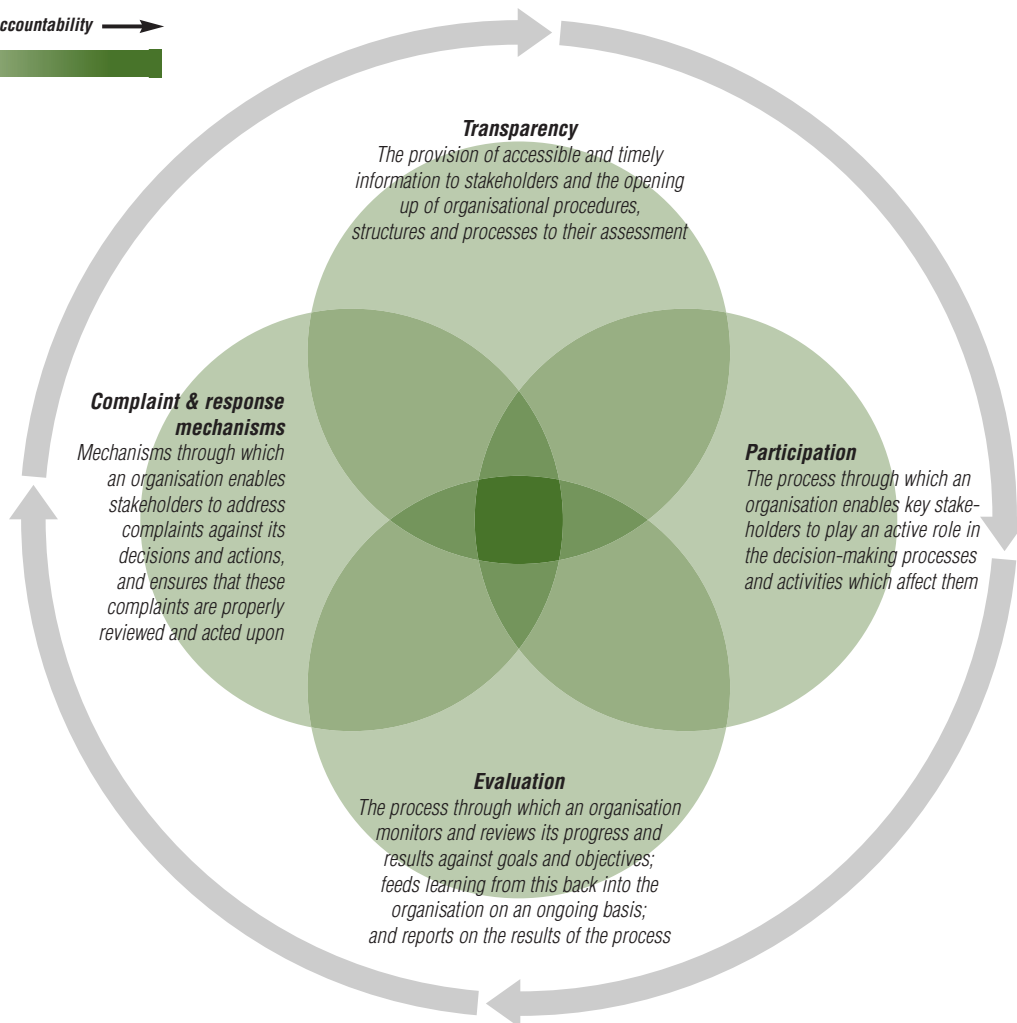
***Mechanisms through which an organisation enables stakeholders to address complaints against its decisions and actions, and through which it ensures that these complaints are properly reviewed and acted upon.***

Enabling stakeholders to seek and receive response for grievances and alleged harm is a critical aspect of accountability. This 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. Complaint and response mechanisms are 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.

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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 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.

Increased accountability →



## Commitment

The degree to which an organisation is committed to accountability will determine the quality of the mechanisms it puts in place and the type of reforms it undertakes to act more responsibly towards key stakeholders and society at large. This is directly dependent on the Board and senior management, and the type of organisational culture they manage to inspire. For accountability to be realised, there are two concrete ways in which commitment needs to manifest itself: **embeddedness and responsiveness**.

### Embeddedness

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. This requires 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 of accountability; and that appropriate incentives and sanctions exist to ensure staff compliance with new practices and procedures. Adequate resources also need to be made available.

### Responsiveness

An organisation's commitment to accountability must be reflected in its responsiveness to stakeholders' concerns and needs, and the willingness to adjust policies when necessary. This requires an organisation to address the power imbalance between itself and stakeholders. This should not be misunderstood as a call for organisations having to do whatever stakeholders want them to, but as one for organisations to show that they consider the needs and views of stakeholders in the decision-making process, provide an explanation as to why they take the decisions they do, and how the stakeholders' needs and views are reflected in them.



Being accountable is about being open with stakeholders and engaging with them in an ongoing dialogue. Accountability generates ownership of decisions and projects and in turn enhances sustainability of results. Ultimately, accountability provides a pathway to better performance.

## 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.

# GAP guidelines: Transparency

## Organisational policy and capacity

<b>T1 Policy development</b>	<b>T1.1</b> The organisational policy on transparency is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
<b>T2 Policy content</b>	<p><b>T2.1</b> The organisation has a disclosure policy that outlines the rules related to access to information.</p> <p><b>T2.2</b> 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.</p> <p><b>T2.3</b> 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).</p> <p><b>T2.4</b> 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:</p> <ul style="list-style-type: none"> <li>• How to make an information request</li> <li>• Timeframes for dealing with information requests</li> <li>• Details of how the response will be made</li> <li>• Details of the rules governing decisions</li> <li>• Costs of obtaining information (if any are incurring).</li> </ul>
<b>T3 Governance</b>	<p><b>T3.1</b> 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.</p> <p><b>T3.2</b> A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on transparency.</p> <p><b>T3.3</b> Evaluation of the transparency policy and process occurs on a regular basis in consultation with stakeholders.</p> <p><b>T3.4</b> 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.</p>
<b>T4 Resources</b>	<p><b>T4.1</b> Resources are assigned for the implementation of the transparency policy throughout the organisation, which cover staff and operational costs.</p> <p><b>T4.2</b> Relevant staff at all levels of the organisation are trained in how to respond to and/or refer an information request.</p> <p><b>T4.3</b> Within the organisation expert resources are available to advise on transparency and information disclosure.</p>
<b>T5 Accessibility: information availability</b>	<p><b>T5.1</b> 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.</p> <p><b>T5.2</b> 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.</p> <p><b>T5.3</b> Contact details for a relevant person in the organisation are provided.</p>
<b>T6 Accessibility: user-friendliness</b>	<p><b>T6.1</b> The process for filing an information request is easily understandable by stakeholders.</p> <p><b>T6.2</b> Requirements for filing an information request take into account the likely capacities of stakeholders.</p> <p><b>T6.3</b> Stakeholders are not prevented from accessing information due to financial constraints.</p> <p><b>T6.4</b> Ideally, the organisation facilitates stakeholders' access to independent support when necessary.</p> <p><b>T6.5</b> The process of filing a request uses appropriate media.</p>

## 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.

# GAP guidelines: Participation

## Organisational policy and capacity

<b>P1 Policy development</b>	<b>P1.1</b> The organisational policy on participation is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
<b>P2 Policy content</b>	<p><b>P2.1</b> The organisation has a clear statement or policy on the role of stakeholder engagement and participatory processes in decision-making, which ensures that key stakeholders will be represented and their interests taken into account.</p> <p><b>P2.2</b> The policy explains organisational decision-making structures and how stakeholder engagement relates to them.</p> <p><b>P2.3</b> The policy clarifies the principles that guide decisions.</p> <p><b>P2.4</b> The policy stipulates how outcomes of any given engagement process will affect decisions and translate into practice.</p> <p><b>P2.5</b> The organisation allows key stakeholders to initiate engagement.</p> <p><b>P2.6</b> 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:</p> <ul style="list-style-type: none"> <li>• The person(s) in the organisation directly responsible for the decisions on any given issue</li> <li>• The stakeholders affecting decisions</li> <li>• The stakeholders affected by the decisions on any given issue</li> <li>• Groups and organisations currently working or that have worked on similar issues</li> <li>• When, to what extent, and on what terms stakeholders are involved.</li> </ul> <p><b>P2.7</b> The policy stipulates that each participation process has clear terms of reference that answer the following questions:</p> <ul style="list-style-type: none"> <li>• Who decides which stakeholder groups are involved</li> <li>• What influences the decision on which stakeholder groups will be prioritised over others</li> <li>• How the decision is made and through what process</li> <li>• The reasons for selecting certain stakeholder groups over others</li> <li>• How representatives from stakeholder groups are selected.</li> </ul> <p><b>P2.8</b> The organisation ensures that stakeholder groups that are engaged are balanced and relevant to the issues discussed.</p> <p><b>P2.9</b> Mechanisms are in place to ensure that those representing other stakeholders are legitimate representatives.</p> <p><b>P2.10</b> The policy needs to be explicit about how it will address costs incurred by stakeholders during engagement.</p>
<b>P3 Governance</b>	<p><b>P3.1</b> 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.</p> <p><b>P3.2</b> A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on participation.</p> <p><b>P3.3</b> Evaluation of the participation policy and participatory processes occurs on a regular basis in consultation with stakeholders.</p> <p><b>P3.4</b> 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.</p>
<b>P4 Resources</b>	<p><b>P4.1</b> Resources are assigned for the implementation of the participation policy throughout the organisation, which cover staff time and operational costs.</p> <p><b>P4.2</b> Relevant staff at all levels of the organisation understand the decision-making structures and processes that guide stakeholder participation, and are trained in participatory practices.</p> <p><b>P4.3</b> Independent advisors and facilitators are used when appropriate.</p>

### **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.

# GAP guidelines: Evaluation

## Organisational policy and capacity

<b>E1 Policy development</b>	<b>E1.1</b> The organisational policy on evaluation is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
<b>E2 Policy content</b>	<p><b>E2.1</b> The organisation has a policy on the need for evaluation of activities, and its role in increasing accountability to stakeholders.</p> <p><b>E2.2</b> Evaluation takes place for key activities, with the objectives of:</p> <ul style="list-style-type: none"> <li>• Providing information to report to key stakeholders on progress against goals agreed with these stakeholders</li> <li>• Providing information to feed into management and learning, both throughout and at the end of the activity.</li> </ul> <p><b>E2.3</b> The policy states that key stakeholders should be involved in evaluations.</p> <p><b>E2.4</b> The organisation has a policy and processes for ensuring learning from evaluations is used within the organisation:</p> <ul style="list-style-type: none"> <li>• Processes exist to feed information and learning from the monitoring and evaluation back into the activity, to contribute to activity effectiveness and success</li> <li>• Mechanisms exist for feeding back information and learning from the monitoring and evaluation into the organisation.</li> </ul> <p><b>E2.5</b> The organisation has a policy that evaluation results and recommendations are reported on fully.</p>
<b>E3 Governance</b>	<p><b>E3.1</b> 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.</p> <p><b>E3.2</b> A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on evaluation.</p> <p><b>E3.3</b> Evaluation of the evaluation policy and evaluation processes occurs on a regular basis in consultation with stakeholders.</p> <p><b>E3.4</b> 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.</p>
<b>E4 Resources</b>	<p><b>E4.1</b> Resources are assigned for the implementation of the evaluation policy throughout the organisation, which covers staff and operational costs.</p> <p><b>E4.2</b> Relevant staff at all levels within the organisation are trained in evaluation and monitoring procedures and the use of results.</p> <p><b>E4.3</b> Within the organisation, expert resources are available to advise on evaluation at all levels.</p> <p><b>E4.4</b> Evaluators, both internal and external, are trusted, credible and impartial.</p>
<b>E5 Accessibility: information availability</b>	<p><b>E5.1</b> 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.</p> <p><b>E5.2</b> 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.</p> <p><b>E5.2</b> Contact details for a relevant person in the organisation are provided.</p>
<b>E6 Accessibility: user-friendliness</b>	<b>E6.1</b> Key stakeholders are not prevented from participating in evaluation for reasons of physical access or communication barriers.

## Evaluation practice

<b>E7 Stakeholder involvement</b>	<b>E7.1</b>	The evaluation for an activity meets the informational needs of key stakeholders: <ul style="list-style-type: none"> <li>• An analysis is undertaken for each planned evaluation to identify key stakeholders and their information needs</li> <li>• The evaluation is designed to ensure all identified informational needs are met.</li> </ul>
	<b>E7.2</b>	Relevant stakeholders are involved in the evaluation of a specific activity: <ul style="list-style-type: none"> <li>• Defining the objectives and parameters of the evaluation in the planning stage</li> <li>• Participating in data collection and analysis if appropriate</li> <li>• Forming conclusions and recommendations</li> <li>• Ensuring appropriate changes are made and learning processes are initiated</li> <li>• Ensuring appropriate reporting of the evaluation.</li> </ul>
	<b>E7.3</b>	Clear and comprehensive information on the evaluation is provided to stakeholders throughout the evaluation: <ul style="list-style-type: none"> <li>• Evaluation objectives and parameters prior to evaluation</li> <li>• Evaluation design prior to evaluation</li> <li>• Results and recommendations from the monitoring and evaluation</li> <li>• Progress on implementation of the recommendations from the evaluation.</li> </ul>
	<b>E7.4</b>	Stakeholder involvement in the evaluation conforms to the guidelines in the Participation section.
<b>E8 Evaluation set-up &amp; planning</b>	<b>E8.1</b>	The purpose and objectives of the evaluation are communicated clearly.
	<b>E8.2</b>	The evaluation is designed so that outputs meet stakeholder needs.
	<b>E8.3</b>	The methodologies identified for use are appropriate to the situation.
	<b>E8.4</b>	Identification of indicators considers data sources and availability, feasibility of data collection, data accuracy and reliability.
	<b>E8.5</b>	The plan for evaluation is feasible in terms of budget, capacity and timescales.
	<b>E8.6</b>	The timing of monitoring and evaluation outputs is planned so as to feed into decision-making processes.
	<b>E8.7</b>	Clear responsibility is allocated for the delivery of the evaluation.
<b>E9 Data collection &amp; analysis</b>	<b>E9.1</b>	Appropriate methods of data collection are used.
	<b>E9.2</b>	Data is checked for errors.
	<b>E9.3</b>	Data is systematically analysed.
	<b>E9.4</b>	Conclusions and recommendations are justified from the data.
	<b>E9.5</b>	Outputs from the data analysis enable action.
<b>E10 Monitoring &amp; learning</b>	<b>E10.1</b>	Results are processed and released on a regular basis to inform the ongoing development and decision-making within the activity.
	<b>E10.2</b>	Adjustments to the activity are made as needed during the monitoring process.
<b>E11 Reporting</b>	<b>E11.1</b>	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.
	<b>E11.2</b>	Evaluation reports are disseminated to key stakeholders on a timely basis.
	<b>E11.3</b>	Evaluation reports are made publicly available.
<b>E12 Specific evaluation</b>	<b>E12.1</b>	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

<b>C1 Policy development</b>	<b>C1.1</b> The organisational policy on complaints and response is developed in consultation with stakeholders and relevant experts, and reflects the needs of stakeholders.
<b>C2 Policy content</b>	<b>C2.1</b> 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. <b>C2.2</b> The policy contains a clear definition of what constitutes a complaint and how validity of complaints will be assessed. <b>C2.3</b> 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. <b>C2.4</b> 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. <b>C2.5</b> 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. <b>C2.6</b> 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 decision-making, and responsibilities for the process. <b>C2.7</b> Identities of complainants and information relating to the complainant can be kept confidential where appropriate. <b>C2.8</b> The organisation has a non-retaliation policy towards complainants. <b>C2.9</b> 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.
<b>C3 Governance</b>	<b>C3.1</b> 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. <b>C3.2</b> A system of incentives and sanctions for employees is operated to ensure compliance with the organisation's policy on complaints and response. <b>C3.3</b> Evaluation of the complaint and response policy and the effectiveness and impact of the mechanism occurs on a regular basis in consultation with stakeholders. <b>C3.4</b> 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. <b>C3.5</b> 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.
<b>C4 Resources</b>	<b>C4.1</b> Resources are assigned for the implementation of the complaint and response policy throughout the organisation, which cover staff and operational costs. <b>C4.2</b> Relevant staff at all levels of the organisation are trained to be able to respond to and/or refer complaints. <b>C4.3</b> Members of staff are able to bring in, or refer to, additional resources in situations where specific expertise is necessary.
<b>C5 Accessibility: information availability</b>	<b>C5.1</b> 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. <b>C5.2</b> 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. <b>C5.3</b> 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.

## What next?

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

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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

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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

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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

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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](mailto:accountability@oneworldtrust.org)

An extended version of this publication with background information and further detail is available in print:

***Pathways to Accountability: The GAP Framework*** by Monica Blagescu, Lucy de Las Casas and Robert Lloyd, One World Trust, London (UK), 2005.

A summary is given below:

**Section 1** of this publication provides a brief overview of global governance and maps out how intergovernmental organisations (IGOs), transnational corporations (TNCs) and international non-governmental organisations (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.

**Section 3** introduces the GAP Framework and identifies each dimension's unique contribution to accountability before discussing 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 increase 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 IGOs, TNCs and INGOs with regards to the four dimensions. It identifies some of the specific accountability challenges faced by each sector and highlights ways in which organisations are trying to overcome them.

The publication also includes a list of events organised by the One World Trust which informed the GAP Framework, and a list of other One World Trust publications.



**one world trust**

An extended version of this publication with background information and further detail is available in print:

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Monica Blagescu, Lucy de Las Casas and Robert Lloyd,  
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