Building a common framework:

Mapping national level self-regulation initiatives against the INGO Accountability Charter

Alice Obrecht, Michael Hammer, Christina Laybourn, with support from Stéphanie Ray

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Over the past decade, civil society organisations around the world have responded to the increasing external demand for them to demonstrate their accountability and effectiveness with a wave of self-regulation initiatives in the form of codes of conduct, charters, evaluation and learning frameworks, as well as assessment and certification schemes. Created by civil society organisations for their own sector, these initiatives frequently touch upon issues such as good internal governance, fidelity to core values, impact-driven management of funds, responsiveness to external stakeholders (including the intended beneficiaries of an organisation’s activity), and other core pillars of accountability. In 2010, the One World Trust’s database on worldwide self-regulation amongst civil society organisations featured over 350 initiatives, providing for the first time a clear picture of CSO self-regulation as a global phenomenon. Yet faced with this large number and diversity of self-regulation initiatives, donors, supporters and other key stakeholders, amongst which are also many major global NGOs themselves are often overwhelmed. They may find that in order to identify trustworthy NGOs, they must first identify a trustworthy self-regulatory initiative.

This report has been developed in cooperation with World Vision International with the aim to help with this process. It analyses the interoperability of principles and standards set out in the INGO Accountability Charter, to which many global NGOs have signed up and begun to report against, with key national level civil society self-regulation initiatives drawn from the One World Trust’s global database, and explores opportunities for and obstacles to mutual recognition or accreditation.

The One World Trust is an independent charity that conducts research, develops recommendations and advocates for reform to make policy and decision-making processes in global and national governance more accountable to the people they affect now and in the future, and to ensure that international law is strengthened and applied equally to all. With its Pathways to Accountability Framework (2005/2012), the Global Accountability Report (2003, 2006-2008), and ongoing research into accountability of NGOs and policy influencing research organisations, the One World Trust identifies international good accountability practice, promotes international benchmarking, and supports organisational change across a wide range of sectors and actors. Founded in 1951, the One World Trust is based in London, and a charity registered in England and Wales (No 1134438).

World Vision is a Christian relief, development and advocacy organisation dedicated to working with children, families and communities to overcome poverty and injustice. World Vision has committed to a range of external codes, charters and standards for NGOs that help us benchmark our performance. These include the International NGO Charter of Accountability, humanitarian accountability initiatives such as HAP, SPHERE, ALNAP, and Codes of Conduct developed by NGO umbrella bodies at country level. Given our global footprint and the experience gained since World Vision was founded in 1950, World Vision has a role to play shaping and encouraging adherence to standards in cross sector partnerships to strengthen aid effectiveness. This paper is a contribution to those processes.

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1 Executive Summary

The primary aim of this study is to support World Vision International in mapping out key national level NGO accountability initiatives that align in their purpose, principles and practical approach with international standards. In addition, the study is aimed at identifying a first cohort of national NGO accountability initiatives that fit the INGO Charter, of which World Vision International is a leading signatory, with a view to exploring interoperability, including the possibility of mutual recognition or accreditation. Such a system of mutual recognition could be recommended to stakeholders as a one-stop-shop, making accountability easier for NGOs to demonstrate and assisting stakeholders to clearly identify organisations engaged in accountability and other best practices.

Reaching both aims requires a stronger understanding of the current gaps and overlap between NGO self-regulatory good practice, embodied in the principles and mechanisms of the INGO Charter, and national-level self-regulatory initiatives (NSRIs). This paper presents such an analysis, structured under three main areas of comparison: Principles, Assurance, and Positioning.

Our analysis of a sample set of 16 NSRIs finds a high degree of overlap between best practice at the national level and the INGO Charter Principles. However, three types of gaps were also identified: interpretive gaps, gaps in which the INGO Charter is leading on best practice, and gaps created by innovative leadership on best practice amongst a minority group of NSRIs.

The INGO Charter remains one of the strongest initiatives in terms of assurance mechanisms. Very few of the NSRIs studied utilised strong sanctioning mechanisms. Many instead used reactive complaints-based sanctioning mechanisms, which offer an arguably weaker form of assurance, as they are triggered only when non-compliance is discovered and reported to the initiative.

A key area to watch in the development of NGO self-regulation and accountability is Positioning, particularly as demands for more rigorous and long-term thinking M&E processes grow stronger. While most NSRIs scored as moderately strong on Positioning, key areas of weakness are stakeholder mapping, the dissemination of evaluations, and the use of higher level planning mechanisms to articulate and plan a vision of change.
2 Introduction

Over the past decade, a wave of initiatives created by NGOs, for NGOs, has risen to meet stakeholder demands for the demonstration of good internal governance, fidelity to core values, impact-driven management of funds, responsiveness to external stakeholders (including the intended beneficiaries of an organisation’s activity), and other core pillars of accountability. In 2010, the One World Trust’s database on worldwide self-regulation amongst civil society organisations featured over 350 initiatives, providing for the first time a clear picture of CSO self-regulation as a global phenomenon.

While this high level of activity in NGO accountability initiatives is a promising indication of the sector’s commitment to accountability and performance principles, it can also potentially undermine the purpose for which such initiatives are created. Faced with an overwhelming number of certification marks, codes of conduct, and other standard-setting schemes, donors, supporters and other key stakeholders may find that in order to identify trustworthy NGOs, they must first identify a trustworthy self-regulatory initiative.

The primary aim of this study is to support World Vision International in mapping out key national level NGO accountability initiatives that align in their purpose, principles and practical approach with international standards. This will help the organisation to identify World Vision offices and partners that in their operations and membership of local self-regulation initiatives align their accountability practices with such international standards, and, where appropriate, work with those that are not yet at this stage. Identifying good practice level self-regulation initiatives is also anticipated to encourage World Vision colleagues to contribute to local efforts to promote NGO accountability.

In addition, the study is aimed at identifying a first cohort of national NGO accountability initiatives that align the INGO Charter, of which World Vision International is a leading signatory, with a view to exploring interoperability, including the possibility of mutual recognition or accreditation. Such a system of mutual recognition could be recommended to stakeholders as a one-stop-shop, making accountability easier for NGOs to demonstrate and assisting stakeholders to clearly identify organisations engaged in accountability and other best practices.

Reaching both aims requires a stronger understanding of the current gaps and overlap between NGO self-regulatory good practice, embodied in the principles and mechanisms of the INGO Charter, and national-level self-regulatory initiatives (NSRIs). This paper presents such an analysis, structured under three main areas of comparison: Principles, Assurance, and Positioning. Section 3 describes the methodology used to select a sample of 16 NSRIs for comparison against the INGO Charter. Section 4 presents the findings from a comparison of the principles and standards of the sample NSRIs against the 20 main principles of the INGO Charter. Section 5 compares these NSRIs to the INGO Charter with regards to the mechanisms and processes used to assure compliance amongst signatories or members of an initiative. The main categories of assurance mechanism, pulled from the One World Trust SRI database, are: Reporting, Verification, Sanctions, and Complaints & Response Systems. Section 6 explores the dynamic aspect of accountability initiatives, analysing the sample and the INGO Charter according to their approaches to encouraging change management,
stakeholder mapping, and learning from evaluations. The report then concludes with key lessons for World Vision International’s future engagement with national-level NGO self-regulatory initiatives and for developing a comprehensive system of mutual recognition between NSRIs and the INGO Charter.

3 Research Approach

3.1 Research Methodology
In order to identify current gaps and shared practices between NGO self-regulation at the national level and INGO self-regulatory good practice, embodied in the INGO Charter, the research approach chosen was to distil from the INGO Charter the most important values, principles and modes of practical realisation of accountability, and ‘test’ or ‘match’ the One World Trust’s global data fund on self-regulation initiatives against them.

It was a priority to design the selection process so as to ensure a high-quality sample that affords a broader starting point on the question of interoperability and coherence of the global landscape of NGO self-regulation.

The selection of the eventually chosen 16 national-level accountability initiatives occurred through four main stages.

3.1.1 Stage 1: Filtering process
Starting with the One World Trust’s database of over 350 CSO self-regulatory initiatives, researchers narrowed the initial group according to the following filters:

- **Type:** Information services, working groups, and awards schemes were filtered out because they lack reporting and sanctioning requirements, and because they bear less similarity in structure to the INGO Charter. This left only codes of conduct and certification schemes.
- **Level:** Per the scope of services, international initiatives were filtered out, leaving regional- and national-level schemes.
- **Compliance:** In order to ensure sufficient relevance and interest of the sample, initiatives that did not at least require a reporting process or have a complaints-based sanctioning mechanism were excluded.
- **Membership:** Initiatives that included other civil society groups, such as trade unions or religious institutions, were excluded in order to focus on NGO-based initiatives.
- **Legal requirement:** If membership of an initiative is required by law in order for an organisation to register as a non-profit, then it was considered to be too close to government regulation to consider in the sample. However, initiatives for which membership is a requirement for receiving certain financial benefits (e.g. in order to apply for funds from a donor or to have donations qualify as tax-exempt), were included in the sample, as they can offer fruitful illustrations of requirements that speak to the concerns of donors and state authorities.
- **Activity level:** As part of maintaining its database, the One World Trust issues an email survey to all listed initiatives annually in order to receive updated information and carry out
an informal check on the activity level of a given initiative. In Stage 1, initiatives listed as ‘inactive’ owing to failure to update in the previous 2 survey rounds (2 years) were excluded from the study.

The filtering process of Stage 1 resulted in a list of 151 initiatives.

3.1.2 Stage 2: Ranking according to thematic area
In order to ensure sufficient similitude between the sample of initiatives and those of the INGO Charter, the research team developed a ranking system based on the principles and scope of the INGO Charter. The principles and scope of 151 initiatives were then ranked according to the following thematic areas:

- **Development/Humanitarian Aid**: Principles or initiative as a whole addressed one or more topics pertaining to development or humanitarian organisations, for example agriculture/food/nutrition, development, education, humanitarian and emergency relief.
- **Universal values**: The establishing documents of the initiative or its content contained an appeal to universal values such as independence, humanitarianism, or human rights.
- **Good governance**: Principles specified good governance best practice, for example stewardship of funds, a commitment to transparency, or board structure.

The top 15% (i.e. those offering a highest level of match with the INGO Charter principles and areas of application in which many INGO Charter organisations and, importantly, World Vision works) were selected to proceed through Stage 3. This yielded a sample of 23 initiatives.

3.1.3 Stage 3: Initial investigation to check relevance
Working with the 23 remaining initiatives, our team investigated the NSRI websites and our contact logs with each NSRI in order to obtain a more updated and detailed picture of each initiative’s activity level. A team discussion was then held to identify other initiatives that One World Trust Researchers, drawing on their sectoral expertise, know are currently demonstrating dynamic progress that is currently not yet captured in the database. This discussion also reflected on the need for geographical spread, as, of the 23 initiatives, the USA, France, Spain, and Palestinian Territories were host countries for at least 2 each. The following research decisions were taken as a result of this process:

- 4 initiatives were removed from the list as a result of further investigation indicating low- to little activity in the past 12 months. An exception was made for the Code of Conduct for NGOs engaged in Humanitarian Action, Reconstruction and Development in Afghanistan. While the Afghanistan Code does not appear to be active in the past 12 months, its establishment and early operation featured heavy donor involvement and it therefore provides a useful illustration of the principles and mechanisms prioritised by donors for NGOs operating in areas of conflict.
- 4 initiatives were removed from the list to avoid duplication of national-level initiatives. In selecting between 2 initiatives for the countries of USA, France, Spain and Palestine, criteria considered favourable for one initiative over another were: longer history in the sector, greater impact on the NGO sector and/or more innovative mechanisms.
• 1 initiative was added to the list: the NGO Coordinates, hosted by the Agency for Social Information in Russia. While this initiative was originally filtered out in Stage 1 owing to weak sanctioning mechanisms, it is currently undergoing processes of development including the promotion of the use of the GRI NGO supplement as a reporting template that may position it as a Russian interlocutor for the INGO Charter.

The end of Stage 3 resulted in a list of 16 national-level initiatives, listed in Table 1 and profiled in further detail in Appendix 1.

3.1.4 Stage 4: Detailed review and mapping
The 16 national-level initiatives were reviewed and mapped against the INGO Charter under the following descriptive criteria. These criteria were identified based on the content and mechanisms of the INGO Charter, with each subset of questions drawn from the CSO SRI database:

• INGO Charter Principles

• Reporting
  o Level of detail
  o Evidence base for reporting: Desk, Field, Both
  o Frequency of reporting
  o Reports publicised?

• Verification
  o Form of verification: Self, Peer, 3rd party
  o Frequency of verification
  o Verification process publicised?
  o Monitoring of verification process to ensure quality?

• Sanctions
  o Type
  o Sanction mechanism publicised?
  o Enforcement
  o Removal from initiative has occurred/is publicised?

• Complaints handling
  o Type
  o Process for making a complaint is publicised?

• Positioning
  o Planning instrument or system that identifies change to be achieved and how to achieve it (e.g. logical frameworks, theory of change, or other high level planning systems)
  o Stakeholder mapping
  o Monitoring and Evaluation commitments

During this stage, emails requesting updates for information were sent to all 16 initiatives. The purpose of this request was two-fold: to ascertain any recent updates that had not yet been announced through the initiatives’ websites, and to provide an informal test of the general responsiveness of the initiative’s host or governing body to external requests for information. The templates for the email, in English and in French, are presented in Appendix 2. Emails were sent on
29 February. As of 16 March, 17 days after the original request, only 1 reply has been received, from ACFID, indicating no recent change in their information. While this level of response from SRIs is not uncommon, and while it does not necessarily indicate a lack of activity, it does reflect a slow reaction time to external stakeholders seeking information from the initiative.

Table 1: List of 16 initiatives, host organisation, country of operation, and short name

<table>
<thead>
<tr>
<th>Full name of initiative</th>
<th>Host organisation</th>
<th>Country</th>
<th>Short name used in Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Code of Conduct for NGOs engaged in Humanitarian, Reconstruction, and Development in Afghanistan</td>
<td>Agency Coordinating Body for Afghan Relief (ACBAR)</td>
<td>Afghanistan</td>
<td>ACBAR Code of Conduct</td>
</tr>
<tr>
<td>Code of Conduct</td>
<td>Australian Council For International Development (ACFID)</td>
<td>Australia</td>
<td>ACFID Code of Conduct</td>
</tr>
<tr>
<td>Voluntary NGO Certification System</td>
<td>Cooperation Committee for Cambodia</td>
<td>Cambodia</td>
<td>CCC Certification System</td>
</tr>
<tr>
<td>Code of Ethics and Operational Standards</td>
<td>Canadian Council for International Cooperation</td>
<td>Canada</td>
<td>CCIC Code of Ethics</td>
</tr>
<tr>
<td>Code of Conduct For NGOs in Ethiopia</td>
<td>Christian Relief and Development Association</td>
<td>Ethiopia</td>
<td>CRDA Code of Conduct</td>
</tr>
<tr>
<td>Charte de Déontologie des organisations sociales et humanitaires faisant appel à la générosité du public (Charter of ethics and conduct for humanitarian and social services organisations seeking funds from the general public)</td>
<td>Le Comité de la Charte</td>
<td>France</td>
<td>Charter of Ethics</td>
</tr>
<tr>
<td>DZI Spenden-Siegel (DZI Donation Seal)</td>
<td>Deutsches Zentralinstitut für soziale Fragen (German Central Institute for Social Issues)</td>
<td>Germany</td>
<td>DZI Donation Seal</td>
</tr>
<tr>
<td>NGO Certification</td>
<td>Philippine Council for NGO Certification</td>
<td>Philippines</td>
<td>Philippine CNC</td>
</tr>
<tr>
<td>NGO Certification Model</td>
<td>Pakistan Center for Philanthropy</td>
<td>Pakistan</td>
<td>Pakistan Certification Model</td>
</tr>
<tr>
<td>Palestinian NGOs Code of Conduct</td>
<td>NGO Development Centre of Palestine</td>
<td>Palestinian Territories</td>
<td>Palestinian NCC</td>
</tr>
<tr>
<td>NGO-Coordinates</td>
<td>Agency for Social Information</td>
<td>Russia</td>
<td>NGO Coordinates</td>
</tr>
</tbody>
</table>
3.2 Challenges and Limitations

Given the short timeframe for this study, a key limitation faced in the research process was ensuring that information on initiatives was updated and accurate, particularly for developing-nation initiatives. Furthermore, while the review yields interesting patterns in national-level initiatives that will be instructive for the INGO Charter as it progresses towards a unified reporting and accountability review system, there was insufficient time or data to draw valid conclusions about the comparative effectiveness of different initiatives. Moreover, assessments of strength of different approaches to reporting and sanctioning mechanisms are based on the research team’s observations from previous research on the strength of regulation in the third sector, rather than on in-depth empirical studies of strength conducted on the specific initiatives included in the review. Further research would be necessary to investigate these issues fully and comprehensively. In particular, the impact of context—such as the regulatory environment and political climate—on the form self-regulation initiatives merits further investigation.

3.3 Structure of Analysis

Accountability is a broad concept with many aspects. Accountability commitments and practices can be analysed in reference to these aspects. For instance, accountability has a normative aspect, reflecting and embodying the values and principles that actors feel obligated to uphold. Accountability commitments and practices are also partially valued for the assurance they provide to stakeholders that an actor is meeting its obligations. Finally, genuine accountability has a dynamic aspect, as it requires an actor to learn from its past successes and mistakes and to anticipate the change that its actions will bring about for its stakeholders.

The remainder of this report analyses current national-level NGO self-regulatory practices against the INGO Charter according to these three broad aspects: Section 4 discusses the normative aspect, comparing the Charter principles to the principles and standards of the sample group. Section 5
analyses assurance mechanisms: reporting, verification, sanction and complaints processes. Section 6 considers the Charter and the initiatives according to the dynamic aspect, examining how they support their signatories in positioning themselves as agents of change. Throughout the report, the reader may find it useful to refer to a scoresheet of the sample 16 NSRs against all three aspects, provided in Table 2.

Table 2: Scoresheet of 16 initiatives against main criteria

<table>
<thead>
<tr>
<th>Initiative</th>
<th>Country</th>
<th>Similitude to INGO Principles</th>
<th>Strength of Reporting</th>
<th>Strength of Verification</th>
<th>Type of Sanction</th>
<th>Complainnt Mechanism?</th>
<th>Strength of Positioning</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACFID Code of Conduct</td>
<td>Australia</td>
<td>100%</td>
<td>Moderate</td>
<td>Strong</td>
<td>Assessment-based</td>
<td>Yes</td>
<td>Moderate</td>
</tr>
<tr>
<td>InterAction Standards</td>
<td>USA</td>
<td>90%</td>
<td>Strong</td>
<td>Weak</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Moderate</td>
</tr>
<tr>
<td>CONGDE Code of Conduct</td>
<td>Spain</td>
<td>85%</td>
<td>Strong</td>
<td>None</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Strong</td>
</tr>
<tr>
<td>CCC Certification System</td>
<td>Cambodia</td>
<td>80%</td>
<td>Strong</td>
<td>Strong</td>
<td>None</td>
<td>No</td>
<td>Moderate</td>
</tr>
<tr>
<td>Palestinian NCC</td>
<td>Palestinian Territories</td>
<td>80%</td>
<td>Moderate</td>
<td>Strong</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Moderate</td>
</tr>
<tr>
<td>Ethics for Action</td>
<td>Chile</td>
<td>75%</td>
<td>Moderate</td>
<td>Strong</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Moderate</td>
</tr>
<tr>
<td>Philippine CNC</td>
<td>Philippines</td>
<td>75%</td>
<td>Very Strong</td>
<td>Strong</td>
<td>Assessment-based</td>
<td>Yes</td>
<td>Strong</td>
</tr>
<tr>
<td>ANONG Code of Ethical Conduct</td>
<td></td>
<td>75%</td>
<td>Strong</td>
<td>None</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Moderate</td>
</tr>
<tr>
<td>CCIC Code of Ethics</td>
<td>Canada</td>
<td>70%</td>
<td>Strong</td>
<td>Strong</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Weak</td>
</tr>
<tr>
<td>CRDA Code of Conduct</td>
<td>Ethiopia</td>
<td>70%</td>
<td>Weak</td>
<td>None</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Moderate</td>
</tr>
<tr>
<td>ACBAR Code of Conduct</td>
<td>Afghanistan</td>
<td>65%</td>
<td>Weak</td>
<td>None</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Weak</td>
</tr>
<tr>
<td>Charter of Ethics</td>
<td>France</td>
<td>65%</td>
<td>Strong</td>
<td>Strong</td>
<td>Complaints-based</td>
<td>Yes</td>
<td>Moderate</td>
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<tr>
<td>QuAM</td>
<td>Uganda</td>
<td>65%</td>
<td>Very strong</td>
<td>Strong</td>
<td>Compliance-based</td>
<td>Yes</td>
<td>Strong</td>
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<tr>
<td>DZI Donation Seal</td>
<td>Germany</td>
<td>60%</td>
<td>Very Strong</td>
<td>Strong</td>
<td>Assessment-based</td>
<td>Yes</td>
<td>Weak</td>
</tr>
<tr>
<td>Pakistan Certification Model</td>
<td>Pakistan</td>
<td>60%</td>
<td>Very Strong</td>
<td>Strong</td>
<td>Assessment-based</td>
<td>No</td>
<td>Moderate</td>
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<tr>
<td>NCO Coordinates</td>
<td>Russia</td>
<td>50%</td>
<td>Weak</td>
<td>None</td>
<td>Complaints-based</td>
<td>No</td>
<td>Weak</td>
</tr>
</tbody>
</table>
4  The normative aspect: Principles

4.1  The INGO Charter Principles
The INGO Charter Principles offer a comprehensive set of best practice values for international organisations working in development and humanitarian aid. The scope of the Charter covers the following main thematic areas:

- Communications
- Management & governance
- Human Resources
- Monitoring and evaluation
- Gender equality
- Environmental impact
- Human rights
- CSO Collaboration and partnership

National-level initiatives vary in their similarity to the INGO Charter partly because of the different focus that a NSRI can take. Initiatives that take place within a developing country, or that have Humanitarian & Development as a defining topic tend to include International NGOs in their membership, whereas initiatives in a developed country that do not focus on humanitarianism or development may host a membership comprised primarily of not-for-profit organisations operating domestically.

Table 2 presents a visual representation of the INGO Charter Principles against the principles and standards of the 16 national-level self-regulatory initiatives (NSRIs) identified in this study, as indicated through the core documents and guidelines of each initiative.

4.2  Areas of overlap
As indicated in Table 2, there is significant overlap between the 16 NSRIs and the INGO Charter. For 17 of the 20 INGO Charter principles, at least 50% of all NSRIs feature a principle or standard of similar content. The following discusses the main areas of commonality and the questions raised by comparing initiatives’ different approaches to principles of effectiveness, efficiency and evaluation.
Table 2: Mapping Country-level initiatives against the INGO Charter

<table>
<thead>
<tr>
<th>INGO Charter Principles</th>
<th>Afghanistan</th>
<th>Australia</th>
<th>Cambodia</th>
<th>Canada</th>
<th>Chile</th>
<th>Ethiopia</th>
<th>France</th>
<th>Germany</th>
<th>Pakistan</th>
<th>Palestinian Territories</th>
<th>Philippines</th>
<th>Russia</th>
<th>Spain</th>
<th>Uganda</th>
<th>Uruguay</th>
<th>USA</th>
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<tr>
<td>Respect for Universal Principles</td>
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<td>Independence</td>
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<td>Responsible advocacy</td>
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<td>Effective Programmes</td>
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<td>Accuracy of information</td>
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1 The table shows host country names instead of the names of the accountability initiatives as these were too long. Please see Table 1 for a full list.
4.2.1 Principles of commonality
The INGO Charter Principles most common across the NSRIs were: Transparency, Reporting, Financial Controls, Good Governance and Human Resources. All 16 NSRIs included a principle of transparency, a commitment to reporting and complying with legal reporting requirements, responsible management of funds, and good governance best practice. 15 of the NSRIs (excluding France-based Charter of Ethics) included commitments to fair human resources practices.

These findings are largely unsurprising, given the prominence of good governance issues in traditional approaches to accountability. The practices captured by these principles—fair procedures for hiring and managing employees, proper accounting for finances, using sufficiently open and well-governed internal decision-making processes—are not specific to NGOs, but rather indicate the basic requirements for a properly-run and lawfully legitimate organisation, be it corporate or not-for-profit. This suggests that INGOs and NGOs can agree broadly on best practice principles for organisational operations, but tend to diverge on principles that more specifically carve out their ideas of the proper role and obligations of an NGO or INGO specifically.

4.2.2 Unravelling effectiveness, efficiency, and evaluation
The demand for NGOs and INGOs to demonstrate that they create meaningful change through an effective use of funds has never been stronger. However, the concern for NGO effectiveness is a broad one, and can incorporate a variety of different emphases and concepts, depending on how an initiative approaches the issue. Common ways of expressing a commitment to effectiveness include: value for money, managing for results, cost-effectiveness, quality-assurance, and evidence-based planning.

This diversity is a challenge for assessing effectiveness, efficiency and evaluation principles against the INGO Charter’s relevant principles. The INGO Charter itself combines three distinct commitments into two principles: Programme Effectiveness and Evaluation (see Figure 1).

![Figure 1](https://example.com/figure1.png)
The INGO Charter’s principle of effectiveness, Effective Programmes, refers to the INGO Charter’s vision of effective programming, i.e. working “in genuine partnership with local communities, NGOs and other organisations aiming at sustainable development responding to local needs.” Some initiatives, such as the CRDA Code of Conduct, took a similar approach, linking local partnership conceptually to effectiveness. The CRDA Code of Conduct does this by listing both within a section titled “People-Centred” principles. Other initiatives, however, separated these two elements into partnership-related principles and effectiveness/efficiency-related principles.

Effectiveness appears again in the INGO Charter under its principle of Evaluation: “We seek continuously to improve our effectiveness. We will have defined evaluation procedures for our boards, staff, programmes and projects on the basis of mutual accountability.” In contrast, several NSRIs separated effectiveness from evaluation. For example:

An evaluation principle from CCC Certification System: “Quality: 6.1 The NGO conducts regular monitoring and evaluation of the organisational management and the programme.”

An effectiveness principle from ACBAR Code of Conduct: “We are committed to effectiveness and to maximizing the positive impact of our programs. We avoid duplication of services.”

Looking ahead to the potential development of a self-regulatory system that encompasses multiple accountability initiatives and streamlines the requirements that organisations must meet in order to gain credibility with donors, it is necessary to highlight that many initiatives take different approaches to expressing requirements of effectiveness, locally-driven development and efficiency. While they can express the same core values, the particular phrasing of a given effectiveness principle may be driven by the desire to meet the interests and priorities of a certain donor group. In attempting to create a common language of accountability requirements, the drivers that lead to these nuances may require more attention than nuances across other types of principle, in order to ensure buy-in from donors who are keen on seeing a commitment to effective programming.

4.3 Areas of divergence

While in general there was significant overlap between national-level initiatives and the INGO Charter, there were several notable absences on both sides. This section discusses INGO Charter Principles that were rarely seen in the NSRIs, as well as common national-level principles and expectations that are not currently found in the INGO Charter.

4.3.1 Absences in national-level initiatives

The INGO Charter Principles with the lowest level of uniformity across the NSRIs were Respect for Sexual Integrity, Fairness in Public Criticism, and Whistle-blower protections.

Given the uniformity of other good governance and internal management best practices, it was surprising to find that only two of the initiatives, ACFID’s Code of Conduct and the Interaction Standards, included principles regarding the protection of whistle-blowers. It may be the case that other initiatives consider whistle-blower protections as encompassed within a commitment to appropriate human resources policies or good governance. However, the INGO Charter’s approach
to whistle blowing as its own distinct principle arguably goes further to embrace the importance of such protections for the detection and elimination of fraud or wrong-doing within an organisation.

Only 3 NSRIs shared a principle sufficiently similar to Fairness in Public Criticism: “We will be responsible in our public criticisms of individuals and organisations, ensuring such criticism amounts to fair public comment.” Most principles or standards pertaining to the public role and voice of an organisation referred to accurate and responsible advocacy, as indicated by the relatively high uniformity (10/16) of the Responsible Advocacy principle. Few initiatives approached the issue of critical advocacy through the lens of fair criticism, even when this principle was interpreted somewhat liberally as a principle requiring organisations to consider the impact of their advocacy on those actors whose interests are affected by it. Section B.4 of ACFID’s Code of Conduct requires organisations that take on an advocacy role to not only work from an evidence-based position, but also to “include the perspectives of those affected” by advocacy. The Interaction Standards feature a set of requirements grouped under the heading “Communications to the U.S. Public” which includes the following: “The organization shall not undertake negative advertising or criticize other member organizations to benefit themselves.” The Russia-based NCO Coordinates, which emphasise issues of free speech and rights of association for non-commercial organisations in Russia, require that “A non-commercial organization takes into account the possible repercussions of its activities for citizens, organizations, the public and the environment.”

While 12 initiatives included references to gender-based discrimination in their commitments to non-discriminatory practices, only 8 of those NSRIs used language that was considered by the One World Trust researchers to possess sufficient strength to match the spirit of the INGO Charter Principle, Respect for Sexual Integrity. This Principle goes beyond a commitment to reducing or eliminating gender-based discrimination to explicitly condemn sexual exploitation and abuse, and to respect sexual integrity in organisational programming.

The Interaction Standards provided one of the most detailed sets of standards regarding the protection of sexual integrity. These requirements, compiled under Standard 7.8 Protection from Sexual Exploitation and Abuse in Humanitarian Crises, includes rules discouraging sexual relationships between humanitarian workers and beneficiaries, prohibiting sexual abuse in multiple forms, and requiring humanitarian workers to create and maintain an environment that prevents such abuse.

4.3.2 Absences in INGO Charter Principles
In an environment as fast-moving as the humanitarian aid sector, even influential and well-established standard-setters will find the need to update their approach routinely to incorporate or respond to new common expectations and principles. With this in mind, it may be instructive for the INGO Charter Company to consider the following principles, some commonly found, others more innovative, that are not at present included in the Charter:

- Beneficiary/client/supporter accountability,
- Responsible portrayal of local people,
- Complaints Handling,
- Disability-based non-discrimination, and
- Environmental sustainability.
It is recognised that the GRI reporting NGO supplement, developed in part to structure reporting against the INGO Charter, goes into more detail on a number of the above areas, yet in its current form the INGO Charter does not steer its readers towards recognised good practice principles in a way that corresponds to the salience of the issues in the current debate. However, the INGO Charter document is the key document used to convince key stakeholders of the strength and level of INGO commitment to key accountability principles.

**Beneficiary/client/supporter accountability:** Accountability to beneficiaries initially received a slow reception amongst humanitarian INGOs, primarily because of the perception that accountability deals with how aid is delivered and how affected populations are engaged with, whereas humanitarian aid is first and foremost concerned with maximising the number of lives saved. However, over the past decade, beneficiary accountability has become a widely accepted good practice, featured at the international level in the Humanitarian Accountability Principles and the Sphere standards, among other initiatives. Similarly, a majority of the NSRIs examined for this study (11 of 16) included principles of accountability towards those intended to benefit from the activities of an organisation. This reflects the growing view that accountability to those in whose name an organisation operates is one of, if not the singular, most important accountability principles an organisation can strive to meet. In the INGO Charter beneficiary accountability is not explicitly mentioned and the concern of working in partnership (a term itself not defined, and encompassing a wide range of practices) is addressed as a subsidiary to programme effectiveness rather than as a stand-alone principle.

**Responsible portrayal of local people:** 5 NSRIs included specific requirements concerning the portrayal of local people and/or beneficiary communities in fundraising and advocacy materials. This principle provides a bridge between accountability to beneficiaries and principles of responsible fundraising, encouraging organisations to treat victims of disaster with dignity in their distributed materials, particularly in those that will potentially bring further income to an organisation. For example, the CONGDE Code of Conduct specifies that, in their communications work, member NGOs must “…avoid messages and images that express any superiority of the North and/or that present Southern populations as objects of our pity/sorrow and not as members in the joint work of development. One must highlight the capacity of people to take this position themselves.” The INGO Charter itself provides only some and unspecific links into these questions with general commitments to responsible advocacy, and accurate use of information.

**Complaints Handling:** The INGO Charter is silent on complaints handling procedures although the GRI NGO reporting supplement which supports reporting against the Charter sets out reporting requirements in this area. In comparison many NSRIs operated complaints handling and response systems for the initiative as a whole (see below, Section 3.2), only 4 require their members to maintain a complaints and response mechanism for their own organisation. An example of this requirement can be found in The ACFID Code of Conduct, where Section D.6.2 lists the following requirements for a complaints handling system for all ACFID signatories:

“Signatory organisations will have a documented complaints handling policy and procedure that:

- Provides an accessible, safe and discreet point of contact for stakeholders in Australia and countries where work is carried out to raise concerns or complaints about the organisation;
• Is responsive and fair;
• Provides information to all stakeholders about the reporting and complaints procedure;
• Provides information in a clear and easily understandable manner in appropriate forms and through appropriate media;
• Ensures requirements for filing a complaint take into consideration the needs of the most vulnerable and considers minority and disadvantaged stakeholders;
• Advises a complainant of the ability to make a complaint regarding an alleged breach of the Code to the ACFID Code of Conduct Committee.”

Environmental sustainability: While the GRI NGO Sector Supplement reporting framework includes reporting requirements for emissions, the INGO Charter Principles themselves contain no commitment to environmental sustainability, although the Charter is aimed at organisations working on environmental protection, and Charter signatories commit to environmental impact reporting. Environmental principles were found in half (8) of the analysed NSRIs. Yet these remain for the most part broadly defined as a general commitment towards the environment and long-term sustainability rather than a specific requirement to report on emissions levels. Most of the NSRIs featuring environmental principles were based in Southern countries, a finding consistent with previous work by the Trust that identified environmental principles as a particular concern of Southern-based SRIs.

In sum, there is a significant degree of overlap between the INGO Principles and the principles of the sample 16 NSRIs. However, three types of gaps were also identified.

1. The first type of gap, indicated by the effectiveness/evaluation principles, is that in which the spirit of a commitment may be the same as that of an INGO Charter Principle, but this similitude is masked by differences in terminology (differences which may, in turn, be shaped by different donor audiences).

2. A second type of gap is identifiable in areas where the INGO Charter is leading on best practice, with NSRIs having yet to significantly address a topic, such as fairness in public criticism or specific provisions for whistle-blowers.

3. Finally, a third gap covers topics that have salience in the current debate and are either common across NSRIs, such as beneficiary accountability, or that a minority of NSRIs are innovatively including. These topics can provide target principles for the INGO Charter to newly incorporate or to strengthen in prominence.
5 The assurance aspect: Compliance mechanisms

Compliance mechanisms are the processes and practices that provide assurance that signatories are actually meeting or striving to meet principles and standards. Previous research by the One World Trust has identified two main approaches to compliance in NGO accountability initiatives: Proactive and Reactive. Proactive approaches are those in which members are required to actively monitor and report on their compliance with the standards. An example of a proactive approach is one in which re-certification or renewal of membership must be achieved on a regular (every 1-3 years) basis. For example, Interaction Standards requires re-certification every other year to ensure members are remaining compliant. Reactive approaches to compliance only monitor or threaten removal from an initiative when there is reason to believe non-compliance, and tend to use complaints-based sanctioning mechanisms. The DZI Seal maintains a reactive approach to compliance that has led to former members being stripped of the Seal on the basis of legitimate complaint.

Compliance mechanisms can also vary in terms of their chronology: Entry compliance mechanisms occur at the initial stage when members join an initiative. Initiatives may require substantial reporting and field visits in order for an organisation to enter the initiative as a signatory. The CCC Certification System, Philippine CNC, QuAM and Pakistan Certification Model all employ stringent Entry mechanisms, using a mixture of field- and desk- based evidence and self- and peer-assessment.

Sanction mechanisms sit on the other end of the membership life cycle as a form of compliance that can lead to the removal of a non-compliant member. The ACFID Code of Conduct operates a sanction mechanism through its Code of Conduct Committee, which regularly monitors the annual reports of its members and can remove members for failure to demonstrate on-going compliance.

Combining these two distinctions, there are, broadly speaking, three types of compliance: Proactive Entry, Proactive Sanction, and Reactive Sanction. There is no category for Reactive Entry, since reactive mechanisms respond only to non-compliance of current members.

5.1 Reporting and Verification

Reporting serves as a main element of proactive compliance, as it requires organisations to actively consider their performance against a set of standards and communicate this to an external audience. Reporting can require desk-based evidence, field-based evidence, or both. It can occur at the Entry stage, as an initial requirement for membership, as well as the Sanction phase, as a requirement for continued membership.

For the purposes of this study, and on the basis of the research team’s previous experience analysing SRIs, the constitutive elements of strong reporting mechanisms were identified as:

- Detail of reporting required
- Reporting required at Entry
- Ongoing reporting required
- Use of both field- and desk-based evidence
The INGO Charter has strong reporting mechanisms. While the level of reporting required to join the Charter is low, all members are required to submit detailed reports based on the Global Reporting Initiative every two years. Compared to the INGO Charter, 10 of the national-level initiatives had strong or very strong reporting mechanisms.

The most common frequency rate of reporting for an initiative’s members is annual reporting (nine initiatives). The only other initiative that features biennial reporting on par with the requirements of the INGO Charter is the Pakistan Certification Model.

While reporting pushes organisations to take an active role in their membership of an accountability initiative, it does not provide assurance that an organisation is substantively meeting the established standards or principles. Rigorous verification processes can check the veracity of reports, thereby ensuring the quality of the information being disclosed. Verification can occur through a peer group: for example the Philippine CNC uses an evaluation team comprised of staff from member NGOs to verify the information submitted by new applicants and carry out site visits. It can also occur through a third party, such as a council or panel comprised of independent experts or stakeholders.

Initiatives that include verification bodies similar to the INGO Charter’s Independent Review Panel are: CCC Certification System (Cambodia), CCIC Code of Ethics (Canada), Charter of Ethics (France), DZI Donation Seal (Germany), Pakistan Certification Model (Pakistan), Palestinian NCC (Palestinian Territories) and QuAM (Uganda).

The CCIC Code of Ethics highlights the limitations that can be placed on verification processes due to a lack of resources. First operational in 1999, the CCIC Code of Ethics underwent a significant revision and updating in 2009. Members are typically required to submit an in-depth self-assessment when they join the Code, then undergo a self-assessed “renewal process” every three years thereafter, providing only a signed statement to the CCIC Secretariat indicating compliance. Due to the roll out of the revised code, between 2010 and 2013, all members will be required to submit a full self-assessment of their status of compliance. A sample of these self-assessments will be verified by the CCIC. However, due to limited resources, the Secretariat states that it will not review the self-assessments of all organisations. While this constraint is understandable, it raises questions regarding the fairness of the process to organisations selected for verification as well as the credibility of the self-assessments of organisations whose compliance against the revised code is not verified.

5.2 Complaints and Sanctions

Reporting is fundamental for understanding where an organisation is performing against a code or framework, and verification processes are important for ensuring such reports are accurate. However, in order for an SRI to provide assurance to external stakeholders, an initiative must have some sanction mechanism: a means by which non-compliant members can be removed from the initiative.

15/16 in the sample used a sanction mechanism. 11 NSRIs utilise a complaints-based sanction mechanism, meaning that they remove organisations only reactively, on the basis of a complaint. 4 NSRIs utilise an assessment-based sanction, in which organisations can be removed for failure to evidence on-going compliance. The Pakistan Certification Model works with a rigorous certification
process that must be repeated by all members for re-certification every 3 years. This process includes the following stages:

- Desk Review of applicant NPO
- Compliance with tax related provisions checked
- Field Evaluation conducted by third party evaluators
- Previous 3-years performance assessed
- Report shared with applicant NPO and feedback from organisation solicited
- Report and feedback sent to Certification Panel, which operates as the final authority to grant or refuse certification

While a rigorous re-certification process may offer stronger assurance of compliance, not all NSRIs will have the resources to support the independent evaluators and Panel needed to check the application of every NPO.

6 The dynamic aspect: positioning
‘Positioning’ refers to the location that an organisation seeks to carve out and occupy within the wider policy field it works in, based on the claims an organisation makes about its purpose – understood as the changes it seeks to bring about and why these changes are valuable – and the choice of means it intends to employ to ensure that the desired changes will occur, often described by way of a theory of change or other high level planning concept.

In difference to the term ‘strategy’, which reflects either deliberately chosen or emergent priorities for work, mostly but not necessarily within a chosen time horizon, ‘positioning’ refers to a more fundamental definition of attitudes to the world around the organisation, and to problematic issues it wishes to address or changes that it may want effect.

Positioning, and the ensuing strategy, determine to some, and arguably, large degree the favoured stakeholder relationships of an organisation, and ideally should also lead to a conscious engagement with less favoured stakeholders. The positioning of an organisation hence fundamentally influences the accountability approach an organisation takes. Importantly however, the larger organisations are, the less they may be in control of accountability demands placed upon them by external stakeholders, including some that may not be on the radar of the organisation, or shunned for different reasons, for instance when influence over the organisation is consciously to be denied to them as competitors, unwanted regulators, coercive political or economic actors, or advocacy targets.

Regular monitoring and evaluation is a key way for organisations to verify whether their positioning works and is conducive to their goals in the light of their theory of change. As NGOs, independent stakeholders

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2 The usage of this term is the result of the One World Trust’s research on accountability of policy oriented research organisations, results of which have been published in form of the database on accountability tools for research and advocacy organisations at www.oneworldtrust.org/apro, and accompanying reports such as Whitty, B.(2008): Accountability Principles for Research Organisations, London, One World Trust, and Hammer, M.; Whitty, B. (2011): Accountability principles for policy oriented research organisations. A guide to the framework and online database, London, One World Trust.
whether service delivery, conveners / networkers, or advocacy organisations, are virtually in all cases co-producers of public goods, rather than sole determinants of public benefit outcomes, such evaluation activities, and relevant review of organisational positioning, also have to address issues of acceptance and collaborative relationships in their field of action, and hence involve participation by others and transparency about results.

The sample group and the INGO Charter were both analysed for positioning along three main categories:

**Planning for change:** The initiative requires / encourages a planning instrument or system which identifies changes to be achieved and how to achieve them

**Stakeholder mapping:** The initiative requires organisations to define their stakeholders; initiative stakeholders are publically defined

**Monitoring & Evaluation:** The initiative includes a commitment to integrate learning in the future; the initiative includes a commitment to disseminate evaluations; the initiative includes a commitment to impact evaluation

Based on these categories, the INGO Charter itself came out as moderately strong on supporting responsible positioning. The INGO Charter requires its members to define their stakeholders and also defines its own stakeholders. Only 2/16 of the NSRIs require their members to engage in stakeholder mapping, while 10 defined their own stakeholders (i.e. stakeholders of the initiative itself). The INGO Charter also performed well on Monitoring & Evaluation, requiring a commitment to learning amongst its signatories and a commitment to impact evaluation. The INGO Charter was weakest on the Planning category, as it does not currently require organisations to adopt planning systems to identify the changes they wish to see and plot a relevant course of action in view of those changes.

Most NSRIs (9/16) scored as moderately strong on Positioning. Many did so due to including only a general commitment to monitoring and evaluation, instead of more rigorous commitments to disseminate evaluations and plan for and measure impact. Others did not require stakeholder mapping or did not identify their own stakeholders.

The NSRIs that were strongest on positioning were: QuAM, CONGDE Code of Conduct, and Philippine CNC. QuAM in particular includes a long list of standards pertaining to improvement, including the requirement that member organisations not only track impact but analyse the cost benefit of impact. Each member of QuAM is required to be “able to identify and has documented how it (or its membership) has learnt and responded from past challenges and successes.”
7 Conclusion

This study finds that cohesion across self-regulatory initiatives worldwide is higher with respect to principles and identified best practice than on the mechanisms used to secure compliance, or on the approaches taken to support signatory organisations to position themselves as agents of change.

While there was widespread overlap between the INGO Charter principles and the principles expressed in the 16 sample NSRIs, important gaps do remain. In the interest of identifying areas of true alignment, there is a need to remain sensitive to interpretive gaps, in which initiatives express similar values but use different terminology to do so. It is also important to consider the diverse audiences that can contribute to these divergences in terminology. Gaps can also point to frontiers for innovation. The INGO Charter appears to be leading the way on fairness in public criticism and whistle-blowing protections, while other NSRIs have proved to be innovators on complaints and response and the respectful treatment of beneficiary groups in images and communication materials. Beneficiary accountability is an area to be addressed more specifically by the INGO Charter. It is widely recognised as good practice amongst the NSRIs examined for this study, but has no corresponding salience in the INGO Charter. Given that the INGO Charter is a key communications and advocacy document to demonstrate strength and level of NGO commitment to accountability (a function which more detailed and longer frameworks such as associated reporting tools cannot perform), the gap remains tangible.

Strong alignment also rests upon the similitude between assurance mechanisms across different SRIs. Here, the INGO Charter remains one of the strongest initiatives in terms of assurance mechanisms. Very few of the NSRIs studied utilised proactive sanction mechanisms. Many instead used reactive, complaints-based sanctioning mechanisms, which offer an arguably weaker form of assurance, as they are triggered only when non-compliance is discovered and reported to the initiative.

A key area to watch in the development of NGO self-regulation and accountability is Positioning, particularly as demands for more rigorous and long-term thinking M&E processes grow stronger. While most NSRIs scored as moderately strong on Positioning, key areas of weakness are stakeholder mapping, the dissemination of evaluations, and the use of higher level planning mechanisms to articulate and plan a vision of change.
**Appendix 2: Reviewed Initiatives**

| **Country:** | Afghanistan |
| **Name of Initiative:** | Code of Conduct for NGOs engaged in Humanitarian Action, Reconstruction, and Development in Afghanistan |
| **Type of Initiative:** | Code of Conduct |
| **Sponsor/Host organisation:** | Agency Coordinating Body for Afghan Relief (ACBAR) |
| **Sectoral focus:** | Development/Humanitarian/Emergency Relief |
| **Year established:** | 2005 |
| **Number of members:** | 84 (of ACBAR) |

**Description**

This code was written by local NGOs with the help of the Danish Committee for Aid to Afghan Refugees in response to criticisms of NGO conduct in post-war Afghanistan.

It is a people-centred code for NGOs engaged in sustainable reconstruction and humanitarian relief. Organisations commit to transparency, accountability, good governance, and non-discriminatory practices based on gender or religion. There is a further commitment to building Afghan capacity.

**Compliance procedures**

**Monitoring mechanism:** Complaints based

**Description of monitoring mechanism:** NA

**Has sanctioning mechanism:** Yes

**Can removal be enforced?:** NA

**Is removal publicised?:** NA

**Description of sanctioning mechanism:**

The Complaints Board reviews complaints.
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<tr>
<td><strong>Type of Initiative:</strong></td>
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<tr>
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<td>Australian Council for International Development</td>
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<tr>
<td><strong>Sectoral focus:</strong></td>
<td>Humanitarian/Development</td>
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<tr>
<td><strong>Year established:</strong></td>
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<tr>
<td><strong>Number of members:</strong></td>
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**Description**

The ACFID Code of Conduct aims to enhance standards throughout the NGDO community and to ensure public confidence in NGDO integrity, quality and effectiveness. The Code defines standards for effective aid and development, coordination and effective relationships with partners, human rights practices, advocacy, organisational integrity, governance, communication with the public, personnel and management practice, financial reporting, and commitment to the Code of Conduct for the International Red Cross and Red Crescent Movement and the Sphere Humanitarian Charter and Minimum Standards in Disaster Response, where applicable. The Code was revised during 2009 and 2010 and was implemented in January 2012. It places stronger emphasis on accountability towards primary stakeholders, including Principles and Obligations on development effectiveness that requires signatories to have their own complaints handling process.

**Compliance procedures**

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</table>

**Description of monitoring mechanism:**

A Code of Conduct Committee, composed of six members from the NGDO community, an independent chairperson and a representative of Australian donors, monitors adherence to the Code through assessment of financial and annual reporting, child protection and gender equity policies, and periodic monitoring the wake of natural disasters.

<table>
<thead>
<tr>
<th><strong>Has sanctioning mechanism:</strong></th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Can removal be enforced?:</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Is removal publicised?:</strong></td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Description of sanctioning mechanism:**

The Code of Conduct Committee also investigates complaints. The Committee can withdraw recognition of a signatory and publish the findings of the investigation if a breach of the code is found. The Guidance Document lays out the procedures in detail, but remedial actions include resolution through a conciliation process, providing information to donors, and addressing the particular issue directly. Sanctions could result in removal from the initiative and the loss of the right to display the ACFID logo. AusAID is also notified and the removal is made public. An appeals process is made available to the NGDO subject of the complaint.
<table>
<thead>
<tr>
<th><strong>Country:</strong></th>
<th>Chile</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of Initiative:</strong></td>
<td>Ética para la Acción. Una contribución a la Transparencia y la Democracia. Código de Ética y Carta de Principios (Ethics for Action: A Contribution to Transparency and Democracy: Code of Ethics and Principles Letter)</td>
</tr>
<tr>
<td><strong>Type of Initiative:</strong></td>
<td>Code of Conduct</td>
</tr>
<tr>
<td><strong>Sponsor/Host organisation:</strong></td>
<td>Asociación ACCIÓN</td>
</tr>
<tr>
<td><strong>Sectoral focus:</strong></td>
<td>General</td>
</tr>
<tr>
<td><strong>Year established:</strong></td>
<td>2007</td>
</tr>
<tr>
<td><strong>Number of members:</strong></td>
<td>70</td>
</tr>
</tbody>
</table>

**Description**

The Letter of Principles of the Chilean Association of NGOs, ACCION, addresses their commitment to strengthen civil society, fight against poverty, promote sustainable development, democracy, transparency and accountability. Complementing this Letter of principles, the Code of Ethics defines the nature and characteristics of NGOs' work, the fundamental values guiding their role and the principles under which they should act and interact with other stakeholders. It also addresses transparency and governance and ethical communications principles.

**Compliance procedures**

**Monitoring mechanism:** Complaints based

**Description of monitoring mechanism:**

An Ethical Committee is in charge of disseminating and educating members about the code. The Committee is composed by five members; three of them will belong to the association and the other two will be independent. The committee will monitor compliance and can act on request of any affected person or on its own initiative.

**Has sanctioning mechanism:** Yes

**Can removal be enforced?** Yes

**Description of sanctioning mechanism:**

Sanctions can go from written admonition, total or partial suspension of member’s benefits to exclusion of the association.
<table>
<thead>
<tr>
<th><strong>Country:</strong></th>
<th>Cambodia</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of Initiative:</strong></td>
<td>NGO Governance and Professional Practice Code of Ethical Principles and Minimum Standard for NGOs in Cambodia and Voluntary Certification Scheme</td>
</tr>
<tr>
<td><strong>Type of Initiative:</strong></td>
<td>Certification Scheme</td>
</tr>
<tr>
<td><strong>Sponsor/Host organisation:</strong></td>
<td>Cooperation Committee for Cambodia</td>
</tr>
<tr>
<td><strong>Sectoral focus:</strong></td>
<td>Development/Humanitarian</td>
</tr>
<tr>
<td><strong>Year established:</strong></td>
<td>2007</td>
</tr>
<tr>
<td><strong>Number of members:</strong></td>
<td>32 certified NGOs</td>
</tr>
</tbody>
</table>

**Description**

The Code of Ethical Principles and Minimum Standards for NGOs in Cambodia is a set of nine ethical principles addressing cooperation, respect and equity in NGOs’ relationships, quality, efficiency and openness; and 25 minimum standards for governance, organisational management and programmes. These principles and standards should guide NGOs’ behaviour and inform stakeholders what they can expect to be upheld by NGOs. This code is the base for a certification scheme managed by the Cooperation Committee for Cambodia, called the Voluntary Certification Scheme, which started in 2007. Applicants for the Certification Scheme are assessed based on desk and field research. Applicants that do not qualify for certification are provided with capacity building assistance, including workshops, training and mentoring.

**Compliance procedures**

<table>
<thead>
<tr>
<th><strong>Monitoring mechanism:</strong></th>
<th>Certification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Certification type:</strong></td>
<td>Third party</td>
</tr>
<tr>
<td><strong>Evidence base:</strong></td>
<td>Desk &amp; Field/Site</td>
</tr>
</tbody>
</table>

**Description of monitoring mechanism:**

The NGO Code Working Group reviews the documents submitted by the applicant and upon its recommendation a field visit and review is organised by NGO GPP staff. The reviews are then submitted to the NGO Code Compliance Committee for final approval. GPP conducts a minimum of one follow-up field check per year of certified NGOs to ensure continued compliance with the Standards. Certified NGOs are required to submit to GPP a copy of their annual report each year. Certification is issued for a period of three years, after which they must apply for re-certification. The CCC website also has a complaint functionality to report suspected non-compliance of/by another NGO.

**Has sanctioning mechanism:** No
Country: Canada

Name of Initiative: Code of Ethics and Operational Standards

Type of Initiative: Certification Scheme

Sponsor/Host organisation: Canadian Council for International Cooperation

Sectoral focus: Development/Humanitarian

Year established: 1995

Number of members: 91

Description

The CCIC Code of Ethics Guidance document sets out minimum standards that put a strong emphasis on partnership as well as governance and transparency. The code has a self certification mechanism and an Ethical Review Committee to help address any issues which arise, but does not mention sanctions.

Compliance procedures

Monitoring mechanism: Self assessment

Description of monitoring mechanism:

There is a self-assessment and review process.

Has sanctioning mechanism: Yes

Can removal be enforced?: Yes

Description of sanctioning mechanism:

The system mostly relies on self-assessment and peer accountability. The CCIC only takes disciplinary action when there is an extreme case of non-compliance, in which case the board of directors can withdraw organisation's membership.
Country: Ethiopia
Name of Initiative: Code of Conduct for NGOs in Ethiopia
Type of Initiative: Code of Conduct
Sponsor/Host organisation: Christian Relief and Development Association
Sectoral focus: General
Year established: 1999
Number of members: 333 (of CRDA)

Description
The Code of Conduct for NGOs in Ethiopia is one of the oldest CSO self-regulatory initiatives in Africa. The initiative, currently supported by CRDA, is the result of work beginning in 1997 by a cross-section of Ethiopian NGOs to develop a draft code of conduct. The purpose of the Code is to enhance transparency, accountability, quality of service delivery, and exchange of best practice within the Ethiopian NGO community.

Compliance procedures
Monitoring mechanism: Complaints based

Description of monitoring mechanism:
The Code establishes a Code Observance Committee elected by CRDA members is responsible for reviewing any complaints received about non-compliance with the Code. The Committee is also charged with overseeing and promoting implementation of the Code.

Has sanctioning mechanism: Yes
Can removal be enforced?: Yes

Description of sanctioning mechanism:
The Committee may provide assistance to any member found to have violated the Code, formally sanction the member, or in extreme cases recommend expulsion of the member from CRDA.
Country: France

Name of Initiative: Charte de Déontologie des organisations sociales et humanitaires faisant appel à la générosité du public (Charter of ethics and conduct for humanitarian and social services organisations seeking funds from the general public)

Type of Initiative: Certification Scheme

Sponsor/Host organisation: Le Comité de la Charte

Sectoral focus: General

Year established: 1989

Number of members: 75

Description
The code commits members to financial transparency, good governance, ethical fundraising and complete communications. It also recommends that organisations write complementary internal regulations to help with implementation. External audits are required every three years, but can be held more often if the Committee feel that there is reason to do so.

Compliance procedures

Monitoring mechanism: Complaints based

Description of monitoring mechanism:
Re-certification is normally required every 3 years, but the Committee can re-examine members at will.

Has sanctioning mechanism: Yes

Can removal be enforced?: Yes

Description of sanctioning mechanism:
Complaints board reviews complaints and reserves the right to terminate membership.
| **Country:** | Germany |
| **Name of Initiative:** | DZI Spenden-Siegels (DZI Donation Seal) |
| **Type of Initiative:** | Certification Scheme |
| **Sponsor/Host organisation:** | Deutsches Zentralinstitut für soziale Fragen |
| **Sectoral focus:** | Fundraising |
| **Year established:** | 2006 |
| **Number of members:** | 226 |

**Description**

The DZI Donation Seal certifies organisations in financial transparency, operational efficiency and good governance. A bulletin is published twice a year which lists the organisations that have earned the Seal.

**Compliance procedures**

- **Monitoring mechanism:** Certification
- **Certification type:** Third Party
- **Evidence base:** Field/Site

**Description of monitoring mechanism:**

Certification must be renewed annually.

- **Has sanctioning mechanism:** Yes
- **Can removal be enforced?** Yes

**Description of sanctioning mechanism:**

A complaints board reviews any complaints, and the Seal can be taken away from an organisation found to be in noncompliance, and only reapplied for after a year.
Country: Pakistan
Name of Initiative: NPO Certification Model
Type of Initiative: Certification Scheme
Sponsor/Host organisation: Pakistan Center for Philanthropy
Sectoral focus: General
Year established: 2002
Number of members: 201

Description

The NPO Certification is a very detailed process, requiring an external audit every three years. The means of verification (usually desk based review) is specified for each requirement, as well as weighted score for each requirement. A minimum of 60% is required for certification. The certification system is split into governance, program delivery and financial management sections.

Compliance procedures

Monitoring mechanism: Certification
Certification type: Third Party
Evidence base: Desk and Field/Site

Description of monitoring mechanism:

Participating organisations must be fully re-certified every three years.

Has sanctioning mechanism: Yes
Can removal be enforced?: Yes

Description of sanctioning mechanism:

Complaints board reviews complaints.
<table>
<thead>
<tr>
<th><strong>Country:</strong></th>
<th>Palestinian Territories</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of Initiative:</strong></td>
<td>Palestinian NGOs Code of Conduct</td>
</tr>
<tr>
<td><strong>Type of Initiative:</strong></td>
<td>Code of Conduct</td>
</tr>
<tr>
<td><strong>Sponsor/Host organisation:</strong></td>
<td>NGO Development Centre of Palestine</td>
</tr>
<tr>
<td><strong>Sectoral focus:</strong></td>
<td>General</td>
</tr>
<tr>
<td><strong>Year established:</strong></td>
<td>2008</td>
</tr>
<tr>
<td><strong>Number of members:</strong></td>
<td>400+</td>
</tr>
</tbody>
</table>

**Description**

The Palestinian NGOs code of conduct was developed under the auspices of the NDC, in conjunction with four other umbrella groups who form the Coalition. The Code is the result of consultations with CSOs in Palestine. The NDC also offers training and capacity building programmes to help CSOs comply with the code's standards on transparency, governance, and accountability. The NDC has also developed some toolkits to help NGOs assess their compliance with the code.

**Compliance procedures**

**Monitoring mechanism:** Complaints based

**Description of monitoring mechanism:**

The NDC has developed toolkits to help assess compliance.

**Has sanctioning mechanism:** Yes

**Can removal be enforced?:** NA

**Description of sanctioning mechanism:**

A complaints board reviews complaints.
<table>
<thead>
<tr>
<th><strong>Country:</strong></th>
<th>Philippines</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of Initiative:</strong></td>
<td>NGO Certification</td>
</tr>
<tr>
<td><strong>Type of Initiative:</strong></td>
<td>Certification Scheme</td>
</tr>
<tr>
<td><strong>Sponsor/Host organisation:</strong></td>
<td>Philippine Council for NGO Certification</td>
</tr>
<tr>
<td><strong>Sectoral focus:</strong></td>
<td>General</td>
</tr>
<tr>
<td><strong>Year established:</strong></td>
<td>1998</td>
</tr>
<tr>
<td><strong>Number of members:</strong></td>
<td>332</td>
</tr>
</tbody>
</table>

**Description**

The Philippine Council for NGO Certification is a private, non-profit corporation which certifies non-profit organisations applying for donee status (organisations that can receive donations allowed as business deductions for tax income purposes). Organisations applying for certification file a letter of intent and submit the necessary documents. If the organisation qualifies for evaluation, it undergoes the evaluation process which includes site visits by an evaluation team. If the applicant NGO meets the minimum criteria for certification (mission and goals, resources, program implementation and evaluation, planning for the future), the Board gives a 3-year or 5-year certification to the NGO and informs the Philippine Bureau of Internal Revenue (BIR) which then issues to the organization a certification of Donee Institution Status.

The PCNC certification scheme is one the most widely known self-regulatory initiatives for the CSO sector. The initiative has gained widespread credibility since its inception. However, the focus of this certification is on financial management and governance issues. Issues such as programme quality, beneficiary engagement, and transparency are given limited attention in the scheme.

**Compliance procedures**

<table>
<thead>
<tr>
<th><strong>Monitoring mechanism:</strong></th>
<th>Certification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Certification type:</strong></td>
<td>Third Party</td>
</tr>
<tr>
<td><strong>Evidence base:</strong></td>
<td>Desk and Field/Site</td>
</tr>
</tbody>
</table>

**Description of monitoring mechanism:**
Certification must be renewed every 3-5 years.

**Has sanctioning mechanism:** Yes

**Can removal be enforced:** Yes

**Description of sanctioning mechanism:**
The removal of certification.
<table>
<thead>
<tr>
<th><strong>Country:</strong></th>
<th>Russia</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of Initiative:</strong></td>
<td>NCO-Coordinates</td>
</tr>
<tr>
<td><strong>Type of Initiative:</strong></td>
<td>Code of Conduct</td>
</tr>
<tr>
<td><strong>Sponsor/Host organisation:</strong></td>
<td>Agency for Social Information</td>
</tr>
<tr>
<td><strong>Sectoral focus:</strong></td>
<td>General</td>
</tr>
<tr>
<td><strong>Year established:</strong></td>
<td>2004</td>
</tr>
<tr>
<td><strong>Number of members:</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Description**

The NCO Coordinates is a principles based, voluntary code of conduct for non-commercial organisations in Russia. The code commits signatories to democratic governance, transparency, freedom of action and equal rights, and was written in response to a growing demand for accountability and independence in the sector. There is deliberately no monitoring mechanism as the initiative is meant to spur organisations on to self-regulation, rather than as fully fledge self-regulation in itself.

**Compliance procedures**

- **Monitoring mechanism:** Commitment only
- **Has sanctioning mechanism:** No
Country: Spain

Name of Initiative: Código de Conducta

Type of Initiative: Code of Conduct

Sponsor/Host organisation: Coordinadora de ONGD - España (Development NGO Coordination - Spain)

Sectoral focus: Development

Year established: 1998

Number of members: 92

Description

The code was written to show solidarity among the NGO development sector, originally in 1998 and revised in 2005 and 2008. The members commit to standards of transparency, partnership with the South, ethical use of images and advertising, good governance and gender sensitivity. There is a separate commission which deals with publicising the code and compliance. If an NGO is found to be in non-compliance, they can be removed from the initiative, and this would be made public.

Compliance procedures

Monitoring mechanism: Complaints based

Has sanctioning mechanism: Yes

Can removal be enforced?: NA

Description of sanctioning mechanism:
The complaints board reviews complaints.
Country: Uganda

Name of Initiative: NGO Quality Assurance Mechanism (QuAM)

Type of Initiative: Certification Scheme

Sponsor/Host organisation: Development Network of Indigenous Voluntary Association

Sectoral focus: General

Year established: 2006

Number of members: 35

Description

QuAM is seeks to promote generally acceptable ethical standards and operational norms among Ugandan NGOs. It sets principles and standards to protect the credibility and integrity of participating NGOs. QuAM was established in 2006 and includes three levels of certification: provisional, full, and advanced. QuAM also includes detailed implementation guidelines.

Compliance procedures

Monitoring mechanism: Certification

Certification type: Peer

Evidence base: Desk and Field/Site

Description of monitoring mechanism:

Certification begins with a self-assessment. A peer review verifies the findings and provides recommendations. The initial certification is valid for two years. Subsequent renewals are valid for three years.

Has sanctioning mechanism: Yes

Can removal be enforced?: Yes

Description of sanctioning mechanism:

Certification can be revoked if the agreed standards are violated in a way that may "endanger the credibility" of an NGO or the sector. District Committees may recommend revoking a certificate to the National Council. The Council may then demand the certificate's return. Appeals may be taken to the District Committee or National Council.
<table>
<thead>
<tr>
<th>Country:</th>
<th>Uruguay</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of Initiative:</strong></td>
<td>Código de Conducta Ética de la Asociación Nacional de ONG Orientadas al Desarrollo (Code of Ethical Conduct of the National Association of Development NGOs)</td>
</tr>
<tr>
<td><strong>Type of Initiative:</strong></td>
<td>Code of Conduct</td>
</tr>
<tr>
<td><strong>Sponsor/Host organisation:</strong></td>
<td>Asociación Nacional de ONG Orientadas al Desarrollo (National Association of Development NGOs)</td>
</tr>
<tr>
<td><strong>Sectoral focus:</strong></td>
<td>Development</td>
</tr>
<tr>
<td><strong>Year established:</strong></td>
<td>2008</td>
</tr>
<tr>
<td><strong>Number of members:</strong></td>
<td>94</td>
</tr>
</tbody>
</table>

**Description**

The Code of Conduct includes fundamental and operational principles and guidance for the management of non-governmental organisations. It defines the identity; characteristics and role of organisations and lists a set of principles that should guide NGOs’ relationship with other NGOs, grassroots organisations, the state, international cooperation, private donors, citizens and beneficiaries. It also provides general guidance to enhance governance, addressing transparency, human resources, financial management, conflicts of interests and communications. Compliance with the code is monitored by an Ethics committee who will mediate conflict resolution and apply sanctions.

**Compliance procedures**

**Monitoring mechanism:** Complaints based

**Description of monitoring mechanism:**

A Monitoring Committee will follow up the implementation and dissemination of the code. They will also mediate conflicts and receive complaints.

**Has sanctioning mechanism:** Yes

**Can removal be enforced?:** Yes

**Has removal ever been used?:** No

**Description of sanctioning mechanism:**

The Monitoring Committee can impose sanctions ranging from suspension or exclusion of a member.
Country: United States of America
Name of Initiative: InterAction PVO (Private Voluntary Organisation) Standards: Self Certification Plus
Type of Initiative: Certification Scheme
Sponsor/Host organisation: InterAction - American Council for Voluntary International Action
Sectoral focus: Development/Humanitarian
Year established: 2004
Number of members: 186

Description
The InterAction PVO standards were developed after a pilot study in the 1990s as a response to demand from members for guidance regarding operational standards. The Standards were first implemented in 1994. Self Certification Plus was introduced in 2006 because of member requests for a stronger compliance system to the PVO standards, and is now required of all members.

Interaction’s PVO Standards were first introduced in 1994 to ensure consistency and quality in the work of US-based development and humanitarian non-profit organisations. Since that time, they have served to establish minimum quality standards within the sector, ensuring quality in service delivery and public communications about members’ work. Self-Certification Plus was introduced in 2006 to strengthen the initiative’s compliance mechanism by requiring a more detailed declaration and additional documentation to back up that declaration. The initiative also adds value to the sector through efforts at continuous improvement in its implementation including both the 2006 revision and the planned 2010 revision. Furthermore, the PVO Standards have been used by other national level initiatives as a reference point. Finally, the level of detail of the PVO Standards and the participation of over 175 members indicates that it is feasible to set high and specific standards and achieve fairly wide participation, at least in contexts where members have sufficient resources to achieve compliance.

Compliance procedures
Monitoring mechanism: Certification
Certification type: Self
Evidence base: Desk
Description of monitoring mechanism:
Recertification is required every other year.
Has sanctioning mechanism: Yes
Can removal be enforced?: Yes
Description of sanctioning mechanism:
InterAction reviews complaints.