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Addressing accountability in NGO advocacy

Practice, principles and prospects of self-regulation

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The One World Trust promotes education and research into changes required in global governance to achieve the eradication of poverty, injustice, environmental degradation and war. We develop recommendations on practical ways to make powerful organisations more accountable to the people they affect now and in the future, and how the rule of law can be applied to all. We educate political leaders, decision makers and opinion-formers about the findings of our research.

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Global and national non-governmental organisations (NGOs) are the most distinct organisational form of civil society, and as such have become increasingly involved and influential in forming public opinion and policy through targeted and professional campaigning and policy advocacy. Yet their growing power has also raised questions about the basis on which they engage in these activities, including their accountability and legitimacy in view of frequent explicit or implicit claims these organisations make to social representation, the quality of their research work, and the public benefit they provide.

Based on a world-wide survey of civil society self-regulatory initiatives undertaken by the One World Trust this paper examines how NGOs have begun to address the accountability challenges they face in particular when engaging in advocacy and explains some of the strengths and weaknesses of existing self-regulation for NGOs engaged in advocacy. Research presented in the paper suggests that both normative and instrumental reasons account for the adoption of accountability principles by advocacy organisations through self-regulation, and that lessons learnt from the One World Trust's parallel work on accountability principles for policy oriented research organisations can be usefully applied also to strengthen accountability of advocacy NGOs.

The briefing identifies for each major dimension of accountability a set of initial good practice principles for advocacy organisations, including on

- transparency of the evidence basis used in advocacy, of funding and funders for specific campaigns and activities, and around forward looking information such as strategy, and the processes used to determine advocacy priorities;
- opportunities for participation of beneficiaries and other key stakeholders of the organisation in the development of advocacy objectives and their review; and
- the development of criteria for evaluating the impact of advocacy with beneficiaries and other stakeholders, and the establishment of feedback and complaints handling mechanisms to address individual experiences and problematic impacts.

The paper concludes with the identification of remaining challenges for research and self-regulation practice to strengthen accountability in advocacy by NGOs: how to deal with inherent tensions between objectivity and messaging in purpose driven advocacy; how to protect independence, freedoms and role of NGOs in the public policy process, and how to strengthen the connection between ethical practice in fundraising and self-regulation of policy advocacy work.

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1 Introduction

Through their campaigning, advocacy and lobbying efforts civil society organisations, and NGOs in particular, play a large, and growing, role in policy formation at national and global levels. International NGOs such as Amnesty International, Greenpeace and Oxfam are well known for their advocacy efforts, which have put issues such as human rights, climate change, poverty and development firmly in the public eye and on political agendas.

Yet despite the wide recognition of the contribution many NGOs make to society there is still a widespread perception among key stakeholders in public institutions, the research community and even peers within civil society, as well as the general public, that policy advocacy by NGOs is often not sufficiently supported by evidence, lacks nuance, and is not necessarily distinguishable from special interest lobbying. This is problematic as, for instance, the Council of Europe found that lobbying in Europe was generally perceived by the public to be an unaccountable and opaque activity, sometimes even a form of corruption¹. An EU Monitoring and Advocacy Program report from 2006 also noted that advocacy in Eastern Europe was still a highly amateur activity, and as such not very effective². NGO advocacy work is therefore considered by some, including many working in research, as necessarily biased in the sense of being informed by the mission and objectives of the organisation rather than “[...] the research itself inform[ing] how society is engaged.”³ Many policy-oriented research organisations are for these reasons not very keen to identify their own work to influence policy as advocacy. None of the research organisations interviewed for the One World Trust’s *Accountability Principles for Research Organisations* project, for example, identified themselves as advocacy organisations, despite being open about attempting to influence policy. Instead, they claimed legitimacy for their findings based on research quality alone, rather than any claims to positive impact or public benefit.

Claims of representing interests of a specific group or sector in society are also a problematic source of legitimacy for advocacy NGOs, as they require substantiation in ways usually not open to research groups, and may even contradict accountability mechanisms used to ensure quality of research. There are therefore a whole range of concerns about the basis of policy advocacy by NGOs that contribute to the questioning of legitimacy and accountability of organisations engaged in advocacy activities. These concerns may undermine the important contribution NGOs engaging in policy advocacy can make to the forming of public opinion and shaping of public policy on issues of considerable concerns to citizens. Yet without civil society organisations involved, democratic governance would evidently be poorer, and lack important balancing elements to the formal democratic system⁴.

Attempts by governments to regulate civil society and NGOs in particular, however, have proven to be fraught with difficulties and to raise additional questions. First, the more interventionist approaches to regulating civil society organisations are, the more they risk damaging the inherent qualities of the sector itself: independence, exercise of freedom of expression and association, and the provision of alternative channels for citizens to voice

¹ Council of Europe (2009): Lobbying in a democratic society (European Code of Conduct on Lobbying), <http://assembly.coe.int/Documents/WorkingDocs/Doc09/EDOC11937.pdf>

² Anati, M. (2006): ADVOCACY: Are civil society organisations any good at it? (And what exactly IS it anyway?), <http://www.eumap.org/journal/features/2006/advocacy/>

³ Whitty, B. (2008): *Accountability Principles for Research Organisations*. London, One World Trust, p.13

⁴ Kaldor, M.; Kumar, A.; Seckinelgin, H. (2009): Introduction, in: *Global Civil Society 2009. Poverty and Activism*, London, SAGE Publications, p. 18f

their interests and concerns in the public sphere. Second, questions and concerns about whether an organisation indeed contributes to the public benefit have often been confused with the issue of how to assess and measure the impact of particular policy advocacy activities. Yet the process of forming public policy is not linear, and the public benefit of contributions to public policy discourse may arise more from their level of quality and overall diversity, than from the particular direction an advocacy proposition may take. On the whole these challenges make substantive external regulation through standards established by government not only difficult, but arguably even undesirable.

In contrast, self-regulation offers the opportunity to develop process-oriented, sector-wide, and beneficiary-focused approaches to strengthen accountability for advocacy organisations, which allow the practitioners themselves to focus on different types of accountability which need to be realised without sacrificing the independence of their organisations, and the aspirations in their mission and values.

This paper explores the role that self-regulatory initiatives are currently playing in enhancing accountability for advocacy organisations, the strengths and weaknesses of the areas being addressed by current initiatives, and the potential for increasing and improving accountability of advocacy activities, that they afford. Reviewing a number of self-regulatory initiatives from within and without the narrower field of CSO self-regulation as case-snapshots, and drawing on lessons from wider research work on the accountability of global organisations and accountability in policy oriented research, the paper identifies some tentative good practice principles in the area of transparency, participation, evaluation and managing feedback⁵. These may be helpful to structure further work on self-regulation to strengthen accountability in NGO advocacy. The paper concludes with some questions that remain open for further reflection and research: how to deal with inherent tensions between objectivity and messaging in purpose driven advocacy; how to protect independence, freedoms and role of NGOs in the public policy process, and how to strengthen the connection between ethical practice in fundraising and self-regulation of policy advocacy work.

2 What is CSO or NGO self-regulation? What is advocacy?

Predominantly since the 1990s and motivated by increasing external scrutiny a growing number of NGOs (and other Civil Society Organisations (CSOs)) have come together at national, regional and international levels to develop common norms and standards for good practice. Such sector level self-regulatory initiatives have become an important means of increasing CSOs' credibility and legitimacy with stakeholders, helping build public trust, protecting the political space for CSOs to operate, and supporting the sharing of good practice and learning⁶.

⁵ These groupings are loosely based on the four main dimensions of accountability identified by the One World Trust in its research on the accountability of global organisations: Transparency, Participation, Evaluation, Complaints & Response. For more detail on theory, methodology, and practical research application of the framework, see Blagescu, M.; de las Casas, L.; Lloyd, R. (2005): Pathways to Accountability – the Global Accountability Framework, London, One World Trust; and Lloyd, R.; Warren, S.; Hammer, M. (2008): the 2008 Global Accountability Report, One World Trust, London

⁶ Definitions and wording used in this section to describe self-regulation draw on text presented by the One World Trust in a previous publication in this series: Lloyd, R.; Warren, S. (2009): CSO self regulation – the global picture, One World Trust Briefing Paper No 119, London, p. 2

CSO self-regulation takes place in three primary ways. In most cases, it involves two or more organisations coming together to either define common norms and standards to which they can be held to account or share good practices so as to improve programme effectiveness. This cooperative effort, as opposed to guidance or policy used by one organisation for its own purposes only, can address a range of issues from how CSOs are governed to what information they should be making public to how they should evaluate their activities. Less frequently, self-regulation can involve a third party such as a peer CSO or watchdog undertaking external assessments of organisations. Finally, in certain circumstances, CSO self-regulation can involve the government. In these cases power is partially delegated to a state accredited umbrella organisation, a governmental but arms-length body, or other association representing CSOs to regulate behaviour or set standards for the sector.⁷

The common thread to all forms of CSO self-regulation is that it is not fully mandated by government regulation; and that at least some aspects of each CSO self-regulatory initiative are the result of voluntary participation by the sector in developing and administering common norms and standards of behaviour.

‘Advocacy’ is used in this paper analogous to the concise definition offered by the Code of Good Practice for NGOs Responding to HIV/AIDS, which describes it as “[...] a method and a process of influencing decision-makers and public perceptions about an issue of concern, and mobilising community action to achieve social change, including legislative and policy reform, to address the concern.”⁸ Advocacy therefore always has a transformative purpose, but the exact shape and boundaries of ‘community’ remain flexible. They could be physical or virtual, and involve beneficiaries, activists, researcher and practitioners, or others. The definition of advocacy organisations includes for the purposes of this paper therefore not only those organisations that make claims to speak on behalf of others. It can also include organisations that engage in advocacy on the basis of insights they gain from research and whose main community to mobilise is a community of knowledge, such as research based organisations, or organisations that conduct advocacy only as a small portion of their overall operations. Organisations need not self-identify as advocacy organisations, but from a perspective of a multidirectional, process and impact driven understanding of accountability⁹, this does not limit their need to be accountable for the advocacy aspects of their work.

3 The context: wider trends and examples in self-regulation for accountability in advocacy and lobbying

A review of civil society self-regulatory initiatives worldwide shows that self-regulation initiatives have become a common means to develop common norms and standards for good practice in response to criticisms and scrutiny of the civil society sector. With regards to self-regulatory initiatives focused on the accountability of advocacy work of NGOs, however, considerably less progress has been made. Of the more than 300 sector-level initiatives identified by the One World Trust, only 32 address issues of accountability concerning

⁷ The exact boundaries are difficult to determine, and largely a matter of the de jure and de facto independence the umbrella or regulating body has of government, and this can change over time.

⁸ The NGO HIV/AIDS Code of Practice Project (2004): Code of Good Practice for NGOs Responding to HIV/AIDS, Geneva, p. 50

⁹ Based on research into the accountability of global organisations, the One World Trust starts with a definition of accountability as “[...] 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.” (Blagescu, M.; de las Casas, L.; Lloyd, R. (2005): Pathways to Accountability – the Global Accountability Framework, London, One World Trust, p. 20).

advocacy, or are targeted at advocacy organisations, though not necessarily exclusively at them. Only one initiative is specific to lobbying¹⁰. The majority of these initiatives are codes of conduct or ethics, four are self-assessment schemes (and one code has a self-assessment tool as well), one is a working group and three are external certification schemes, though none of the certifications are specific to advocacy organisations. International and OECD countries based initiatives primarily target the development and humanitarian sectors¹¹. This is also true for relevant initiatives in developing countries, which in their majority focus on organisations involved in social and economic development work. In difference to the majority of OECD based initiatives these are in the majority in principle open to other NGOs or CSOs as well. In the United States several initiatives address advocacy issues specifically beyond the development sector. They include for instance standards for foundations' and grant-makers' participation in advocacy such as the *Minnesota Council of Foundations'* initiative¹².

In addition, lessons for accountability in NGO advocacy can be drawn from other codes of conduct, which are neither sector-wide or nor specifically targeted towards NGOs. These include for example codes of conduct for political lobbying groups, such as the *American League of Lobbyists Code of Conduct* and the *Canadian Lobbyists' Code of Conduct*. These codes address professionalism, ethics and principles of honesty and integrity of practice among individual lobbyists and do not explicitly include, or exclude, organisational entities undertaking advocacy or lobbying activities. In most cases however, they do not include a measurable commitment to transparency about their activities, objectives, and the evidence base they use beyond the immediate targets, clients, or employers.

Case snapshot 1: Canadian Lobbyists Code of Conduct

Lobbyists' Code of Conduct

Preamble

The Lobbyists' Code of Conduct is founded on four concepts stated in the Lobbying Act:

- Free and open access to government is an important matter of public interest;
- Lobbying public office holders is a legitimate activity;
- It is desirable that public office holders and the public be able to know who is attempting to influence government; and,
- A system for the registration of paid lobbyists should not impede free and open access to government.

The *Lobbyists' Code of Conduct* is an important initiative for promoting public trust in the integrity of government decision-making. The trust that Canadians place in public office holders to make decisions in the public interest is vital to a free and democratic society.

To this end, public office holders, when they deal with the public and with lobbyists, are required to honour the standards set out for them in their own codes of conduct. For their part, lobbyists communicating with public office holders must also abide by standards of conduct, which are set out below.

¹⁰ ALTER-EU and EU Civil Society Contact Group "How to make a transparent registration in the European Commission Register of Interest Representatives"

<http://www.alter-eu.org/en/system/files/publications/registerguidelines.pdf>

¹¹ Research data from the One World Trust CSO Self-Regulatory Initiatives Project as of 1 July 2009. See Table 2 in the Appendix for a full overview and areas of accountability in advocacy they address. The count produced by a search on the database on the One World Trust website by activity sector 'advocacy / lobbying' is currently 24. The difference to the 32 initiatives identified here is due to a difference in classification used for the database and the analysis for this paper.

¹² There are nine versions of the Standards of Excellence, each licensed to be implemented by a different US-based certification body.

Together, these codes play an important role in safeguarding the public interest in the integrity of government decision-making.

Principles

Integrity and Honesty

Lobbyists should conduct with integrity and honesty all relations with public office holders, clients, employers, the public and other lobbyists.

Openness

Lobbyists should, at all times, be open and frank about their lobbying activities, while respecting confidentiality.

Professionalism

Lobbyists should observe the highest professional and ethical standards. In particular, lobbyists should conform fully with not only the letter but the spirit of the Lobbyists' Code of Conduct as well as all the relevant laws, including the Lobbying Act and its regulations.

Rules

Transparency

1. Identity and purpose

Lobbyists shall, when making a representation to a public office holder, disclose the identity of the person or organization on whose behalf the representation is made, as well as the reasons for the approach.

2. Accurate information

Lobbyists shall provide information that is accurate and factual to public office holders. Moreover, lobbyists shall not knowingly mislead anyone and shall use proper care to avoid doing so inadvertently.

3. Disclosure of obligations

Lobbyists shall indicate to their client, employer or organization their obligations under the Lobbying Act, and their obligation to adhere to the Lobbyists' Code of Conduct.

Confidentiality

4. Confidential information

Lobbyists shall not divulge confidential information unless they have obtained the informed consent of their client, employer or organization, or disclosure is required by law.

5. Insider information

Lobbyists shall not use any confidential or other insider information obtained in the course of their lobbying activities to the disadvantage of their client, employer or organization.

Conflict of interest

6. Competing interests

Lobbyists shall not represent conflicting or competing interests without the informed consent of those whose interests are involved.

7. Disclosure

Consultant lobbyists shall advise public office holders that they have informed their clients of any actual, potential or apparent conflict of interest, and obtained the informed consent of each client concerned before proceeding or continuing with the undertaking.

8. Improper influence

Lobbyists shall not place public office holders in a conflict of interest by proposing or undertaking any action that would constitute an improper influence on a public office holder.

However, other professional codes of conduct, such as the *Australian Lobbying Code of Conduct*, explicitly exclude NGOs from their definitions of lobbyists. Finally, there are government-sponsored, yet voluntary, initiatives addressing lobbying issues. For example, the *Council of Europe's European Code of Good Conduct for Lobbying*, lays out same

standards of conduct governing the behaviour of more for-profit lobbying, but does not make clear whether NGOs performing advocacy and lobbying activities should subscribe to the standards outlined in the Code. Significantly, none of these three types of initiatives address the specific challenges facing NGOs performing advocacy on behalf of marginalised or ‘voiceless’ groups in society whose interests they claim to represent. Establishing accountability to such groups is inherently difficult simply because of their marginal status in society. Similarly, codes of conduct for individual advocates engaged in one-to-one advocacy in the social care and services sector are also fairly well established. Examples include the *UK Advocacy Network (UKAN) Code of Practice* (1994), *Independent Specialist Advocacy in England and Wales: Recommendations for Good Practice* (2002) and the *Disability Advocacy Resource Unit Code of Conduct* (Australia, 2008).

Finally, lessons can also be derived from quality systems or guidance used by organisations to address advocacy practice and standards on behalf of individuals, a point which separates them from most advocacy NGOs who mainly conduct cause-based advocacy¹³.

An example is *Action 4 Advocacy*. This UK-based resource and support agency for organisations and advocates of individuals with mental health issues has developed three self-regulatory tools: a 10-point advocacy charter which establishes principles of advocacy, a code of practice (based on many previous codes some of which are mentioned above) and a certification of quality (see Case snapshot 2). While only some elements of each of these codes are applicable to NGOs engaged in advocacy, all of them provide guidance that could assist NGOs in improving the accountability in and of their advocacy work.

Case snapshot 2: Action 4 Advocacy Quality Performance Mark

Action 4 Advocacy Quality Performance Mark

Action 4 Advocacy (A4A) is a UK based resource and support agency for organisations and advocates who work with and represent individuals. A4A does not perform cause-based civic advocacy.

The Quality Performance Mark (QPM) developed by A4A is for individual advocates, speaking on behalf of individuals with mental health issues. It is therefore not a sector-level NGO self-regulatory initiative. However, it provides an illustrative example of the possibilities afforded by self-assessment and external certification and their potential application to accountable NGO advocacy. While not all aspects of the QPM framework are relevant for issue-based civic advocacy groups, several key elements could be usefully adapted to NGOs engaged in advocacy.

Firstly, the consultative and participatory process undertaken by A4A in the development of acceptable principles and quality standards which were applicable, relevant and sufficiently stringent could serve as a model for other sectors, such of cause-based advocacy.

Secondly, the QPM’s three step process of evaluation, beginning with self-assessment, then reporting to an external monitoring body and finally an external audit to provide advice for future improvement is a constructive and flexible manner of addressing potential accountability issues. Feedback from organisations which have used the QPM is overwhelmingly positive regarding the learning possibilities afforded by the self-assessment and desk review.

Specifically, the QPM addresses seven areas of best practice for advocates:

- **Independence** – structural, financial and operational; and beneficiary led advocacy.
- **Clarity of Purpose** – mission statement, code of practice, and a clear definition of people, places and issues served

¹³ Work on and for individuals is however often an important aspect of work of organisations such as Amnesty International

- **Confidentiality** – protecting individuals involved as required by law, research and communication ethics
- **Equality, Accessibility and Diversity**
- **Empowerment and Putting People First**
- **Supporting Advocates**
- **Accountability and Complaints** – transparency, annual reports, and disclosure of fund use

These principles are central to many self-regulatory initiatives. Legitimacy of advocacy on the grounds of representation is difficult to establish and organisations must be above reproach if they are to effectively criticise the behaviour of other organisations or institutions. The QPM requires higher standards of its own assessors than of the organisations it assesses. Transparency, particularly in disclosing any possible conflicts of interest or reasons why an organisation might not be unbiased, is vital to the credibility of advocacy organisations.

A further type of self-regulatory initiatives useful to illustrate are self-assessment tools. While in most cases data collected in such tools is not intended for publication or for feeding into third party rankings or ratings, their use helps to structure organisational work processes, makes data collection for required purposes of the assessment more systematic, and can demonstrate organisational accountability. In most cases any reluctance to publish results of such self-assessment is unwarranted, as trust in organisations is set to rise with the degree of information disclosed. A brief review of key elements of the advocacy self-assessment tool accompanying the *Code of Good Practice for NGOs Responding to HIV/AIDS*¹⁴ is presented as a case snapshot to show which areas a practical accountability self-assessment tool for NGOs working in a specific field may cover.

Case snapshot 3: Self-Assessment Tool for NGOs working in HIV/AIDS Advocacy

Code of Good Practice for NGOs Responding to HIV/AIDS - Self-Assessment Tool for NGOs working in HIV/AIDS Advocacy

The Code of Good Practice was developed in 2004 to enshrine and guide good practice, facilitate continuous improvement and accountability amongst NGOs working in the field of and responding to HIV/AIDS. In addition to the Code itself (and numerous other materials) a self-assessment tool has been produced to help organisations review the quality of its advocacy planning and approach, and meet key good practice principles of accountability. While intended primarily for internal use. It contains, however, a range of questions that organisations are asked in order to address key accountability aspects. These key aspects are outlined below.

- Identify the key commitments the organisation makes on the substance of its advocacy (in this case, the commitment to advocate for an environment that promotes and protects the rights of communities, and to plan, monitor and evaluate for effectiveness in response to communities' needs)
- Analyse of the organisational structure and identify advocacy issues (such as key affected populations, participation of communities and individuals affected by HIV, lobbying for legislative changes to support care and treatment of people living with HIV, health care changes)

¹⁴ International Treatment Preparedness Coalition (ITPC); Asia Pacific Network of People Living with HIV (APN+) (n.d.): Code of Good Practice for NGOs Responding to HIV/AIDS Self-Assessment Checklist – Advocacy, <http://www.hivcode.org/silo/files/advocacy-final-oct-08.pdf>. The full code itself can be found at: NGO HIV/AIDS Code of Practice Project (2004): Code of Good Practice for NGOs Responding to HIV/AIDS, Geneva, <http://www.hivcode.org/silo/files/code-of-good-practice.pdf>

- Assess the policy environment in which the advocacy takes place – connection to beneficiaries, evidence based advocacy, organisational learning, data dissemination, stakeholder analysis
- Develop an organisational strategy, including external drivers, objectives, methods, resources and risks
- Network and build coalitions – identify how, with whom and why the organisation networks or cooperates
- Analyse the actions being taken – are the critical elements of targeting, public education, media support, and message relevance and appropriateness being addressed?
- Evaluate the organisation’s impact – is relevant and accurate data collected on progress and changes in environment?
- Ensure continuity and organisational learning – does the organisation learn from mistakes and successes?
- Develop an advocacy action plan, reviewing key questions and setting advocacy priorities for the organisation

4 Strengths: key aspects of accountability in advocacy addressed by NGO self-regulatory initiatives

At present, NGO self-regulatory initiatives addressing issues of accountability in advocacy exist at both international and national levels (see Table 1).

Table 1: NGO self-regulatory initiatives addressing issues of advocacy and lobbying¹⁵

Location	Name
International	<ul style="list-style-type: none"> • The Code of Good Practice for NGOs Responding to HIV/AIDS • (INGO) Accountability Charter (CIVICUS) • Code of Ethics and Conduct for NGOs (WANGO) • Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organizations (NGOs) in Disaster Relief
Africa	<ul style="list-style-type: none"> • Code de déontologie des ONG au Mali (Code of Ethics for NGOs in Mali) • NGO Corporate Governance Manual (Zimbabwe) • Groupe de Réflexion et d’Action des Intervenants en Environnement du SECO-ONG (GRAINE) (Mali) • Code of Conduct for Somali NGO Networks • CONSS Code of Conduct (Coalition of NGOs in Sokoto State - Nigeria) • Code of Conduct for NGOs in Nigeria (Nigeria Network of NGOs) • Code of Ethics and Conduct for Egyptian NGOs (in draft) • Code of Conduct for NGOs in Ethiopia (Christian Relief and Development Association)
Europe	<ul style="list-style-type: none"> • Code of Conduct on Images and Messages (CONCORD / Dóchas, and Cercle de Coopération de Développement Luxembourg) • A Shared Ethics Charter (Coordination SUD - France) • How to make a transparent registration in the European Commission Register of Interest Representatives (European Civil Society Contact Group and Alliance for Lobbying Transparency and Ethics Regulation in the EU (ALTER-EU)) • Ethical Guidelines for North/South information in Norway (RORG-Samarbeidet Network) • PASOS Project (Europe, Caucasus and Central Asia)
Latin America	<ul style="list-style-type: none"> • Minimum requirements for information to be published on web page (NGOs for Transparency - Colombia) • Code of Ethics Confederación Colombiana de ONGs (Confederation of Colombian NGOs)

¹⁵ All of these initiatives may be accessed via an online database at www.oneworldtrust.org/csoproject.

	<ul style="list-style-type: none"> • Ethics for Action: A Contribution to Transparency and Democracy: Code of Ethics and Principles Letter (Asociación ACCIÓN - Chile) • Code of Ethics of Civil Society Organizations (Permanent Forum for CSOs - Honduras) • Guide to Responsible Management for Civil Society Organizations (Parceiros Voluntarios – Brazil)
Middle East	<ul style="list-style-type: none"> • Palestinian NGOs Code of Conduct
Southeast Asia	<ul style="list-style-type: none"> • Code of Ethics for Social Development NGOs and POs (NGO Forum on Cambodia) • CODE-NGO Covenant on Philippine Development (Philippines) • Charity Research Initiative (Copal Partners – India)
USA	<ul style="list-style-type: none"> • PVO Standards: Self-certification Plus (InterAction) • Criteria for membership in Global Impact • Standards of Ethics for Nonprofit Organizations in Utah (UNA) • Accountability Self- Assessment Tools For Private Foundations (Minnesota Council of Foundations) • Principles and Practices for Nonprofit Excellence (Minnesota Council of Nonprofits) • Standards for Excellence: An Ethics and Accountability Code for the Nonprofit Sector (Standards for Excellence Institute)

At the international level, they include the World Association of NGOs (WANGO) Code of Ethics and Conduct for NGOs, the EU Civil Society Contact Group / ALTER-EU report (in the following ALTER_EU Report): How to make a transparent registration in the European Commission Register of Interest Representatives, and the Code of Good Practice for NGOs Responding to HIV/AIDS. At the national level, where codes addressing accountability issues in advocacy are most prevalent, examples include the Ethical Guidelines for North/South Information in Norway and the Cambodian NGO Forum’s Code of Ethics for Social Development NGOs and POs¹⁶. A summary of the individual approaches taken by each of these codes to accountability issues in advocacy is included in the Appendix.

Figure 1 on page 1 provides an overview of which main types of commitments regarding accountability relevant for advocacy are addressed by sector level self-regulatory initiatives reviewed by the One World Trust.

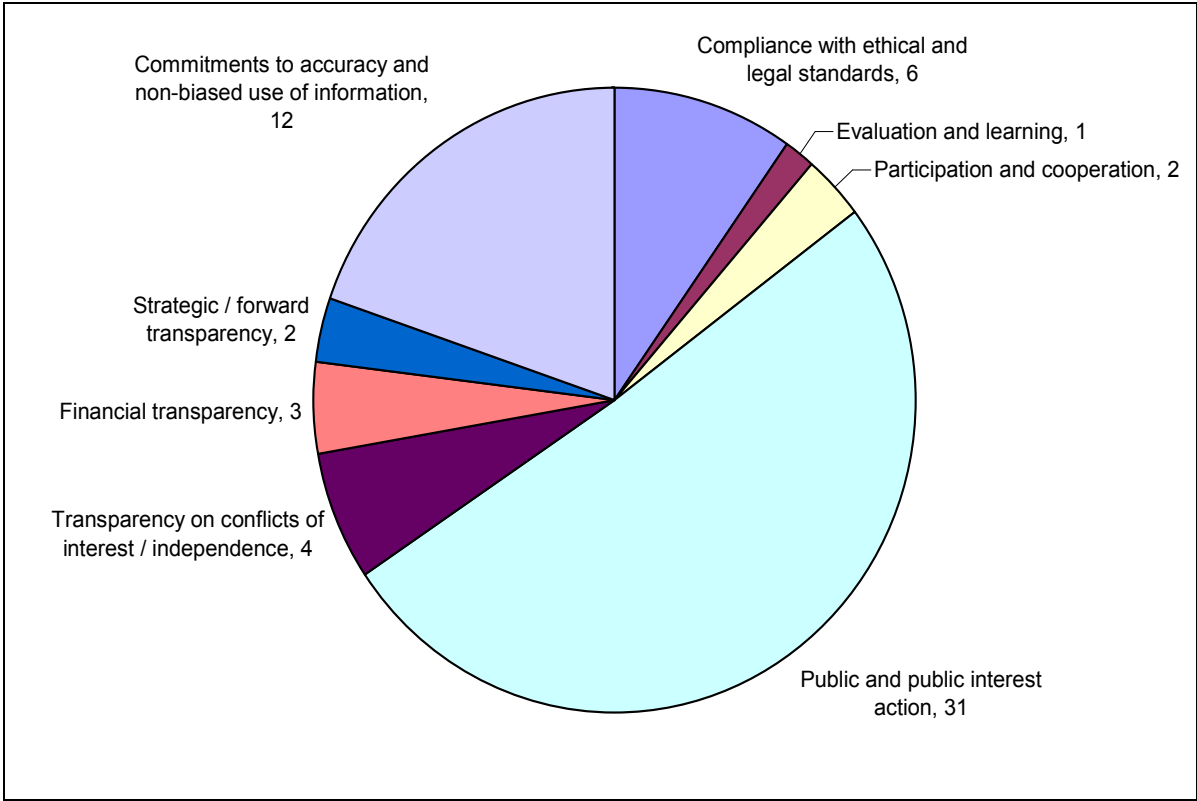
4.1 Stand up and be counted – an aspiration to contribute to public life and policy

The most frequently incorporated aspect of accountability in advocacy is one of substantive responsiveness to the needs of beneficiaries. Sixteen of the 32 sector-level self-regulatory initiatives require NGOs to actively engage through advocacy or in other tangible ways in the public policy process, i.e. to take a public stance and / or promote insights the organisation has for the benefit of their constituencies or the wider public, in addition to any other programme work they may undertake. The *Nigeria Network of NGOs’ Code of Conduct for NGOs in Nigeria*, for example, states that NGOs should engage with and make use of civic education, participatory democracy and advocacy in their work. Other self-regulatory initiatives, such as the *Ethical Guidelines for North/South information* in Norway and *Code of Ethics of Civil Society Organizations (Permanent Forum for CSOs - Honduras)* frame the role of advocacy in terms of being the duty and right of NGOs to provide an alternative source of information for policy makers and the general public. The *GRAINE* initiative in Mali calls for NGOs to engage tactfully and professionally in environmental policy formation.

¹⁶ This code has since been replaced by a newer version, the *NGO Good Practice Project - Code of Ethical Principles and Minimum Standard for NGOs in Cambodia*, which does not explicitly address advocacy.

The importance given to this aspect in connection with accountability by NGO self-regulation schemes suggests a strong sense of purpose of the sector as a whole to participate in public life, to stand up and be counted. From this aspiration, however, follows inevitably an expectation that NGOs can operate with the necessary freedoms and rights. Yet not all formal regulatory environments are receptive to the idea of NGO participation in public policy formation and wider democratic governance, a point discussed later in section 5.1.

Figure 1: Main types of accountability commitments made in recorded, advocacy related NGO self-regulatory initiatives



4.2 Transparency related commitments

The next most important area addresses transparency related issues such as commitments to accuracy of information used in lobbying, the disclosure of conflicts of interest, and to financial transparency in terms of use of funds. Only a few initiatives require the publication of forward looking information, such as on strategy, advocacy priorities, and how these are set.

4.2.1 Ensuring accuracy, independence and disclosing conflicts of interest

While several self-regulatory initiatives have begun to address issues of transparency in advocacy, most of them are primarily focused on addressing concerns about credibility and impartiality. Broadly speaking, accountability initiatives which address advocacy in Europe and North America seek to tackle the perception, still prevalent amongst many research organisations and NGOs, that advocacy is prone to influences that may introduce bias into

research¹⁷. Specifically, initiatives such as the *InterAction's Private Voluntary Organization (PVO) standards* or the *World Association of NGOs (WANGO) Code of Ethics* require organisations to accurately use data, and commit to an unbiased use of information in advocacy. The *WANGO Code of Ethics* also asks for disclosure of any bias in case this is inherent to the information presented. *The Coalition of NGOs of Sokoto State (CONSS) Code of Conduct in Nigeria*, which is derived from the *WANGO Code of Ethics*, also requires its members to supply accurate information regarding all activities and any legislation that they are opposing. Interestingly, no initiative makes a commitment to disclosure of the evidence base itself. This issue and the problems associated with it are again discussed in more detail in section 5.1.

Initiatives such as the *WANGO Code* also warn against claiming 'representativeness' where it has not been established, and the *Code of Conduct on Images and Messages* requires the permission of any person depicted in an image before it may be used, and that any person involved in a situation that is being depicted have the opportunity to tell their own story. Connected to this other initiatives require signatories to spell out how the organisation conducts its advocacy work and avoids conflicts of interests. Six of the initiatives for instance require organisations to have a written policy regarding advocacy and lobbying work¹⁸, but most do not indicate what should be included in the policy. Only the *INGO Charter* includes some guidance about the content of advocacy policy, requiring the inclusion of a definition of ethical engagement in advocacy, and a clear conflict of interest policy. Ensuring independence is another concern closely related concern to the issue of addressing conflicts of interest. Some, such as the *Cambodian NGO Forum's Code of Ethics for Social Development NGOs and POs* explicitly call for non-partisan advocacy¹⁹. The most explicit guidance on transparency as a key element of accountability for NGOs engaged in advocacy and lobbying is contained in the *EU Civil Society Contact Group Report on NGO lobbying at EU level: How to make a transparent registration in the European Commission Register of Interest Representatives*. This guidance, however, is limited in scope to the role of disclosure in using the EU lobbying register, which requires the disclosure of the names of lobbyists, the finances involved in lobbying and the issues that will be subject to advocacy. The *ALTER-EU Report* highlights however the weaknesses in the current system for registration of lobbyists at EU level and in its report calls for increased transparency beyond the minimum requirements of the register with regards to inclusion of organisations in the register, fuller financial reporting and clear disclosure of who is advocating on which issues in order to make conflicts of interest more apparent.

4.2.2 Financial transparency

The majority of the 300 plus self-regulatory initiatives identified in the One World Trust global survey of civil society self-regulation initiatives require blanket transparency in fund use, and this is also true for many of the 32 sector-level initiatives which focus more specifically on advocacy. However, while financial transparency in fund use has been addressed by the

¹⁷ Whitty, B. (2008): *Accountability Principles for Research Organisations*, London, One World Trust, see footnote 3

¹⁸ The purpose of such a policy being to guide, establish and ensure good practice on the way advocacy activities are carried out.

¹⁹ Many developing country codes of conduct for NGOs, particularly those in new democracies and fragile states, explicitly state that NGOs must remain non-partisan and apolitical, though they rarely specify advocacy aspects of NGO work.

reporting requirements in several initiatives (3 codes), there is to date no initiative which explicitly requires transparency about the financing of a specific advocacy campaign. The reason for this may be that, as Hudson (2002) found for example for the United Kingdom, it is rare for an organisation to receive funding targeted specifically for advocacy work. In consequence funds are usually derived from project or programme funding, and not specifically identified in their use for advocacy²⁰. Transparency in this area may however help to begin answer questions about how much or how little influence (or knowledge) a donor organisation has or could have over the advocacy agenda of a given NGO that it funds.

To help with the process of reporting, the *ALTER-EU Report*, offers specific instructions on how to calculate the funds used in lobbying within a larger budget, and also highlights some of the difficulties organisations may face in identifying precisely how much of their funds are being used for advocacy.

However, developments in this area are not easy to read. The *Brazilian Parceiros Voluntarios' Guide to CSO management*²¹ also contains financial reporting requirements, but does not link the financial reporting to advocacy specifically. And in some cases formal regulation places in many cases restrictions on NGO's involvement in political campaigning and advocacy (see section 5.1). The *Maryland Standards for Excellence*, which are used in a total of nine US States, for example, specifically prohibit the use of US government funds for lobbying purposes. In addition to potentially limiting the role of NGOs in the public policy process, this may also lead to less transparency and not more. Affected organisations may feel the need to be cloudier about the use of funds, than they normally would.

4.3 Compliance with law and ethical standards

Compliance with the law and ethical standards is the last area which is addressed by a more significant number of initiatives (of the few that are concerned with advocacy). Interestingly, such legal compliance (4 codes), is often mentioned in conjunction with the need to achieve change. The *Code of Conduct for NGOs in Ethiopia* for instance calls for NGOs to comply with all legal requirements, but to lobby for change where appropriate. The code further discusses the promotion of beneficiary and sector interests, but does not use the word lobbying or advocacy elsewhere. The draft *Code of Ethics and Conduct for NGOs in Egypt* calls for compliance with all legal standards in Egypt, but not to the detriment of advocacy efforts to promote the public good.

Even though many self-regulatory initiatives do not specifically contain a reference to advocacy activities, some contain guidance or principles on ethic in communications, and how to ensure respect for the dignity of the beneficiaries in the work of the organisation. The *CONCORD / Dòchas Code of Conduct on Images and Messages*²², for example, addresses how poverty is presented in development or humanitarian aid related publicity materials, without specifically targeting advocacy NGOs. The *Code* requires that all people depicted in messages and images used by NGOs be treated with dignity, their permission be sought before use and that every situation be depicted in a complete and unbiased way. It also

²⁰ Hudson, A. (2002): [Advocacy by UK-based development NGOs](#), in: *Nonprofit and Voluntary Sector Quarterly*; 31 (3), p. 402-18.

²¹ A draft of this guide was under consultation at the time of writing this paper.

²² CONCORD / Dòchas (2006): on Good Practice on Images and Messages relating to the Third World <http://www.deeep.org/codeofconduct.html>

requires that people involved have the opportunity to tell their own story – though the *Code* does not specify what must be done with this information or how it should be incorporated into the messages.

Case snapshot 4: *CONCORD* / *Dòchas* Code of Conduct on Images and Messages

Code of Good Practice on Images and Messages relating to the Third World

Guiding Principles

Choices of images and messages will be made based on the paramount principles of:

- Respect for the dignity of the people concerned;
- Belief in the equality of all people;
- Acceptance of the need to promote fairness, solidarity and justice.

Accordingly in all our communications and where practical and reasonable within the need to reflect reality, we strive to:

- Choose images and related messages based on values of respect equality, solidarity and justice;
- Truthfully represent any image or depicted situation both in its immediate and in its wider context so as to improve public understanding of the realities and complexities of development;
- Avoid images and messages that potentially stereotype, sensationalise or discriminate against people, situations or places;
- Use images, messages and case studies with the full understanding, participation and permission (or subjects' parents/guardian) of the subjects;
- Ensure those whose situation is being represented have the opportunity to communicate their stories themselves;
- Establish and record whether the subjects wish to be named or identifiable and always act accordingly;
- Conform to the highest standards in relation to human rights and protection of the vulnerable people.
- Conform to the highest standards in relation to children's rights according to the Convention on the Rights of the Child (CRC); as children are the subjects most frequently portrayed

Declaration of Commitment

As signatories to this Code, we confirm that our commitment to best practice in communications affects the entirety of our organisation.

1. By signing the Code, we commit to putting in place meaningful mechanisms to ensure that the Code's principles are implemented throughout all activities of our organisation.
2. Our responsibilities as a signatory to this Code lead us to be accountable in our public communications as follows:
3. We will make the existence of the Code known to the public and all our partners and will provide a feedback mechanism whereby anyone can comment on the fulfilment of the Code and where any member of the public will have a 'right to challenge' our application of the Code.
4. We will communicate our commitment to best practice in the communication of images and messages in all our public policy statements by placing [a] [...] statement on our relevant public communications [...]
5. We commit to assess our public communications on an annual basis according to the guiding principles.

6. We will include reference to adherence to the Code in the guiding principles of our organisation and ensure that the top management take the responsibility of implementing and adhering to the code
7. We will ensure that all relevant suppliers, contractors and media will adhere to the Code when working with our organisation.
8. We commit to training our staff on the use of images and messages.
9. We agree to meet on an annual basis and share our experience of using and implementing the Code with other Dochas members.

The aim of this *Code* is to ensure that the portrayal of poverty situations is properly contextualised and maintains the dignity of those on whose behalf an organisation is advocating or fundraising. Most messages and images which are communicating the realities of poverty have an advocacy aspect, but beyond a value statement on equality, solidarity and justice the *Code* does not guide the particular purposes to which the images are put; it is primarily concerned with the way they are used in relation to the portrayal of individuals and their situations²³. Several initiatives, such as the *Shared Ethics Charter of Coordination SUD* also specify areas or issues which should be the focus of advocacy, which can be framed in ethical terms, such as the promotion of human rights, international development, and poverty alleviation.²⁴ Given that the success of advocacy by many NGOs, in particular those driven by philanthropic motives such as access to human rights, development, and justice, relies on their ability to affirm and communicate their own integrity and values, adherence to ethical standards, including respect for dignity of those they serve, are key aspects of stakeholder accountability. Defaulting on them can lead to serious reputational damage.

5 Areas of weakness and opportunities to identifying some tentative good practice principles

Advocacy, in one form or another, is a central part of the work and identity of most NGOs, and the positive or negative perception that stakeholders may have of NGOs is significantly influenced by their ability to demonstrate accountability in their advocacy or wider communications work. Despite this there are a number of areas of weakness around specific dimensions of accountability, and some problematic issues of more general nature.

5.1 Transparency of the evidence base: between a rock and a hard place?

Section 4.2 shows that current self-regulatory initiatives in the NGO sector have begun to address transparency related challenges. However, they mostly focus on issues of accuracy, conflicts of interest, and transparency about the use of funds. To date, no initiative identified in the survey effectively tackles the question of transparency of the evidence basis and methodology used. In the field of policy oriented research, this has however emerged as one of the prime marks of quality of work and accountability, often being the element that most

²³ While the Code does not explicitly reference advocacy or fundraising activities, it is implicit in how NGOs would be using images and messages that these are the target activity areas concerned.

²⁴ Only the *Code of Good Practice for NGOs Responding to HIV/AIDS'* self-assessment tool contains specific standards; these are examined in Case snapshot 3: Self-Assessment Tool for NGOs working in HIV/AIDS Advocacy).

determines the credibility of a research organisation²⁵. While in some ways this is also the approach taken by the *Code of Conduct on Images and Messages* which requires that all advocacy messages be presented within the local and wider context, to ensure that the full complexities of the situation are being communicated, there are special challenges to finding appropriate and helpful solutions to realising accountability in relation to the evidence basis in the context of advocacy.

- First, as Keck and Sikkink (1998) emphasise, the success of many advocacy campaigns relies more on the effective framing and targeted communication of data to support a particular view over another, rather than informational certainty as such²⁶. Advocacy often involves short messages rather than nuanced reports and analyses. As the nature of poverty and development issues is complex, the requirement of the *Code of Conduct on Images and Messages* may thus be an unrealistic aspiration.
- Second, while acknowledging the benefits of self-regulation and common standards concerns have raised about too much transparency particularly in relation to human rights research and journalism, as it might put at risk the personal safety of sources, and of the activist researchers themselves²⁷.
- Third, balancing commitments to quality of research can also create significant complications with respect to accountability to claimed beneficiaries. Being accountable to and serving the interests of a given interest group will almost always involve making choices about the prominence that is to be given to information that can mobilise support for a specific narrative that organisations on their own or within a wider coalition seek to promote. Shaping such a narrative is an essential element of a successful advocacy campaign²⁸. Yet, this contradicts a commitment to let impartial research drive the recommendations which an organisation puts forward on the issue at hand.
- Fourth, the above point makes advocacy inherently political, and there may therefore be controversy about the integrity of data and possible biases which may result into conflicts about who might have the authority to evaluate, assess or judge the quality of analysis and unbiased use of information.

For all of these reasons, many advocacy organisations may not be keen to institute self-regulation which would ask them to fulfil the same transparency standards that are often required on data and methods in academic research, and which they on occasion will ask of others, such as governments. On the other hand, suggestions that the evidence base for an NGO campaign aimed at influencing public policy is not entirely solid or uncontested may weaken its persuasiveness within the expert community of peers, and policy decision-makers. Establishing quality of the evidence, however, is almost always a function of

²⁵ See Whitty, B. (2008): *Accountability Principles for Research organisations – report*, p. 25

²⁶ Keck, M.A.; Sikkink, K. (1998): *Activists Beyond Borders - Advocacy Networks in International Politics*, New York, Cornell University Press, p. 200ff

²⁷ Hammarberg, T. (2009): *Ethical journalism and human rights*, speech by Thomas Hammarberg, Commissioner for Human Rights of the Council of Europe, 47th Association of European Journalists Congress and General Assembly Maastricht, 20 November 2009

²⁸ Bob, C. (2005): *The Marketing of Rebellion*, New York, Cambridge University Press

extensive data, detailed analysis, and access of critics to source data and methods²⁹.

Further, practice in the academic research community, and also in the field of criminal justice shows that witness or source protection cannot be used as an argument to limit transparency. Techniques of appropriate coding and adherence to provisions of many ethical research and human subject protocols in force in professional research organisations, as do good practice systems in place for instance in the area of medical and criminal investigation of sexual violence³⁰ and also international criminal law³¹, show that increased transparency requirements would not need to compromise confidentiality and the need of protection of individual sources, or breach ethical requirements anonymity such as in case of sensitive medical information³².

The complexities of this issue are also highlighted by the difficulties of establishing consensus on the role of NGOs in public policy processes, when their advocacy work is often considered to be inherently political and subject to bias. As a result many countries place legal limitations on what NGOs, organisations which often benefit from tax exemptions or other forms of support, can do in terms of political campaigning and policy advocacy. In the case of the United States, for instance, tax exemption is tied to the prohibition of pursuing change in national law and party political activity³³. In the UK recently charities have achieved greater leeway to engage in campaigning and political activities, with the continuing caveats that such activities must always be in support of their charitable purposes, never the exclusive work of the charity, and never party-political.³⁴ In Germany, similar to recently introduced language in the UK, tax exemptions and other benefits are tied to a 'public benefit' status, which can address a wide range of substantive areas, but with activities of the organisation having to remain within the democratic and legal framework³⁵. In Uganda, while the initial provisions of the NGO Registrations Act do not mention any limitations to non political activities (except party political support), NGOs have to be termed as providing voluntary, religious, educational, literary, scientific, social or charitable services, to the community or any part of it. Yet in particular the term 'charitable' is not defined in national law. In addition, the requirement of registration entails the right for the National Board of Nongovernmental Organizations to impose conditions on operations, geographical extent, and staffing of NGOs as it sees fit³⁶. The legal provisions affecting the work of NGOs are thus, to varying degree, to subjective interpretation by regulators, which is not helped by the different understanding that many actors in the debate have of terms such as what

²⁹ The recent furore surrounding the probity of research at the Climatic Research Unit at the University of East Anglia shows that doubts about integrity of data and methods used to analyse it can seriously undermine the credibility of the basis on which public policy is made.

³⁰ McQuoid-Mason, D.; Pillemer, B.; Friedman, C.; Dada, Mahomed (2002): Crimes against women and children. A medico-legal guide, Nairobi, Independent Medico-Legal Unit, Nairobi

³¹ Article 68 of the 1998 Rome Statutes for the International Criminal Court sets out the ground rules for the protection of witnesses and victims in cases heard and investigated by the Court. Clause 5 allows the summarizing of evidence for the purpose of the trial where access to the full evidence would involve grave dangers to the witness and family members.

³² It is acknowledged that not in all countries or institutions good practice on research, witness and victim protection is in place or is being observed.

³³ See US Inland Revenue Service Exemption Requirements - Section 501(c)(3) Organizations, <http://www.irs.gov/charities/charitable/article/0,,id=96099,00.html>

³⁴ See Charity Commission (2008): Speaking Out - Guidance on Campaigning and Political Activity by Charities, (CC9, Version - March 2008), <http://www.charity-commission.gov.uk/publications/cc9.asp#11>

³⁵ Bundesrepublik Deutschland (2007): § 52 Abgabenordnung, http://www.gesetze-im-internet.de/ao_1977/_52.html

³⁶ Republic of Uganda (1989): Nongovernmental Organisations Registration Act, Cap 113, Sections 1 and 2.

constitutes 'political' work, and more broadly what role NGOs should play in the formation of public policy.

As civil society organisations have become a more accepted part of democratic life and practice, regulators have become subject to increasing pressure to provide more space for their campaigning and advocacy work. They may only do this, however, if NGOs make greater efforts to disclose information about the evidence basis for their work. In general terms disclosure of the evidence base used for an advocacy campaign is therefore a good practice principle that can both enhance transparency and lend credibility to a campaign, without precluding the production of effective advocacy materials or undermining data protection requirements, safety or other ethical concerns associated with individuals involved. Given the particular importance of ensuring the space for NGOs to engage in the process of public policy formation, the fact that none of the existing self-regulatory initiatives require organisations to disclose or upon request provide access, to the original data and methods of analysis on which the research findings are based may turn out to be a significant weakness and be detrimental to the strategic aim of strengthening the role of NGOs in governance. The fullest possible publication of the evidence base for a particular advocacy campaign would be an important step in allowing the interested public to make their own judgments and or challenge findings and methods as otherwise customary in the research community. At the same time, this openness could result in greater freedoms and legitimacy of engagement in public policy processes.

5.2 Financial transparency

As shown above in section 4.2.2, funding issues are being proactively addressed by NGO self-regulatory initiatives. They do this, however, primarily from the angle of identifying conflicts of interest between funder and the receiving organisation. Initiatives focusing on fundraising ethics and practice in general terms have been identified in the OWT survey in 15 countries, plus one at regional (European) and one at international level. For example, the Spanish Fundraising Association's *Code of Conduct* specifically prohibits fundraisers from seeking funds from organisations whose practices conflict with the mission of the NGO, and many more broad self-regulatory initiatives address ethical fundraising, non-reliance on a narrow funding base, and the importance of only accepting funding that is compatible with a NGO's mission and values.

Yet approaching the funding transparency issue only from the point of view of incompatibility, does not allow external stakeholders to query an organisation over accountability issues that may arise from too great involvement. For example, if the UK Department for International Development (DfID) is the source of much of a NGO's funding, will that affect the level of public criticism regarding DfID policies in a development NGO's advocacy and lobbying campaigns? If an organisation with a strong stance on abortion (whichever way) is the primary source of funding, should that be explicitly stated in an advocacy campaign that addresses abortion related issues, so that questions can be asked whether and how the funding source may have impacted on the design of a particular campaign?

Disclosure of such information plays an enabling role for both stakeholders to exact accountability, and for organisation to demonstrate it proactively, and hence underline the legitimacy of their work. Critically, self-regulation for accountability in advocacy should mandate clear disclosure of the source of funding for a campaign to all its stakeholders

constituents, including beneficiaries, activists and participants, and as appropriate also advocacy targets.

5.3 Forward transparency – strategy, and prioritisation of issues

In addition to the above, the self-regulatory initiatives identified in the One World Trust global survey are particularly weak in terms of commitments to disclose forward looking information, including the advocating organisations' rationale for advocating on a particular issue. Identified initiatives for instance do not require, or even suggest, that organisations demonstrate that advocacy efforts are based on the results of robust research to support prioritisation, and in which way the organisation plans and sets strategy, and what the strategic priorities are. The *WANGO Code*, for example, prohibits representing as fact that which is speculation, but no initiative requires evidence to be produced to show how advocacy priorities were formulated. Given that the mission and goals of the advocating or lobbying NGO will inevitably affect their advocacy agenda, transparency in this area is central to achieving accountability.

Box 1: Good practice principles in transparency for advocacy organisations

Advocacy organisation should disclose or allow access to

- ✓ Data, methodology and other relevant elements of the evidence basis on which advocacy positions are built (including safeguards to protect witnesses and sources)
- ✓ Current forward strategy or strategic priorities alongside the mission statement
- ✓ Decision-making processes used to determine organisational strategy or priority areas of work, as well as how advocacy objectives are decided upon
- ✓ Key personnel (staff/partners, trustees / board / governors) involved in strategy setting, senior decision making on specific advocacy objectives and activities, and those responsible for implementation of advocacy activities (including direct high level lobbying)
- ✓ Main funders, as relevant by advocacy activity or project
- ✓ Registers of interests of key decision makers, organisational partners, and funders

To meet good practice principles of transparency, advocacy organisations may thus want to disclose a significant degree of forward looking information, such as strategic priorities as they arise from their mission, evidence collected about the external world that informs decisions about priorities, and evaluation of and feedback received on their work. Organisational credibility will also benefit from disclosing who is involved in strategic decision making and prioritisation and the advocacy effort itself: disclosing who supports and funds the advocacy activities, who makes decisions, and who carries them out. The disclosure of the names of people or organisations involved in advocacy activities, campaigning as much as lobbying, is equally a vital element, not only to identify but also pre-empt possible conflicts of interest. In addition it offers stakeholders the opportunity to engage with issues of compliance of staff with policy, and fosters the putting in place of complaints mechanisms, including avenues for redress. Some professional codes of conduct require the naming of advocates, particularly the professional codes for lobbyists, but it is not a common feature of the narrower group of NGO self-regulatory initiatives.

5.4 Participation

Issues of beneficiary participation in the development, implementation and evaluation of NGO advocacy work, or issues of representation, and authority to speak on behalf of a group have to date not been sufficiently addressed by existing initiatives. This is surprising because from a global perspective participation is an area in which NGOs have clear strengths compared to other types of organisations³⁷.

Where participatory aspects are included, the approach to accountability taken by the 32 initiatives identified is overall very institution focused (donors, governments, peers) or restricted to involvement of beneficiaries in the programming, but not advocacy work. Self-regulatory initiatives particularly in the development and humanitarian sectors in OECD and many developing countries, address the need for participation and beneficiary involvement in projects. The participation guidance is not limited to implementation; many initiatives also require the involvement of beneficiaries in needs assessment, project design, and evaluation. Significantly, however, this commitment to a participatory approach in humanitarian aid and development has not yet translated into an explicit commitment to participatory advocacy. For example, while the *South African NGO Coalition (SANGOCO) Code of Ethics* specifies beneficiary involvement in all projects which affect them, it does make clear whether advocacy and lobbying activities are considered 'projects'. The *Code of Conduct for Somali NGO Networks* contains standards about lobbying on behalf of beneficiaries in the section on participation and cooperation, but the focus of that section of the *Code* is on inter-organisation cooperation rather than beneficiary participation.

Similarly, a 2002 study of UK advocacy NGOs found that many relevant NGO self-regulatory initiatives did not consider accountability in terms of beneficiaries at all³⁸, and a 2007 *Africa Governance Monitoring and Advocacy Project (AfriMAP)* report says that while the increased involvement of civil society will strengthen democracy in the way the AU works, it does at present not address the involvement of African citizens in the development of the content of that policy influence³⁹.

While many initiatives include commitments to democratic and civic engagement (see section 4.1) or beneficiary engagement in project work, they do not address beneficiary engagement in advocacy. Several of the initiatives from the United States have clauses requiring organisations to promote civic participation and democratic activities such as voting among the people they serve, but do not explicitly address involvement of beneficiaries in advocacy work. Initiatives in Africa also address the role of civil society in the promotion of democratic participation in a transparent and open manner, though they do not clearly indicate how these principles should apply to lobbying or advocacy activities. The *Zimbabwe NGO Corporate Governance Manual*, for example, acknowledges that third generation NGOs engage in advocacy work, but does not further elaborate on standards for that work. At the same time, the *Zimbabwe NGO Code of Ethics*, included as an annex to the *Manual*, specifies that NGOs should be non-partisan in general, but does not draw a clear connection

³⁷ Lloyd, R.; Warren, S.; Hammer, M. (2008): The 2008 Global Accountability Report, p. 26f

³⁸ Hudson, A. (2002): [Advocacy by UK-based development NGOs](#). Nonprofit and Voluntary Sector Quarterly; 31 (3), p.402-18.

³⁹ AfriMAP, AFRODAD; Oxfam (2007): Towards a People-Driven African Union: Current Obstacles and New Opportunities, http://www.soros.org/resources/articles_publications/publications/people_20070124/au_20070124.pdf

with advocacy work. The *Federation of Collectives of NGOs of Mali (FECONG) Code of Ethics for NGOs in Mali* provides more clear prescriptions; the *Code* states that NGOs must engage with the government to promote the interests of the populations that they serve, and includes articles requiring the involvement of affected communities in all NGO activities, but does not link the two activities. In the Middle East, the *Palestinian NGOs Code of Conduct* similarly requires signatories to foster democracy through participation, but does not mention policy influence.

Box 2: Good accountability practice principles for accountability in participatory advocacy

- ✓ Claims to public benefit or benefit to specific groups / entities, and if applicable representation of specific interests or groups are clearly communicated
- ✓ Authority to represent interests and claimed beneficiaries is determined in an open and participatory manner
- ✓ An advocacy campaign that aims to be 'representative' demonstrates the representativity of policy objectives or positions put forward in relation to the views those the campaign claims to represent
- ✓ The advocacy objectives anticipated to benefit claimed beneficiaries, are determined in an inclusive and collaborative manner, including these beneficiaries
- ✓ Exclusion of specific stakeholders from participation processes is disclosed and explained.

5.5 Evaluation, learning and handling feedback

Finally, the review of self-regulation initiatives world-wide shows that at present existing NGO self regulatory initiatives include no or only very limited commitments to evaluation and feedback mechanisms for advocacy work.

Existing literature and review of materials on impact evaluation of advocacy highlights several reasons: first, the importance (rightly) attributed to context and the consequently widely held view amongst NGOs that universal means for evaluating impact of advocacy are inappropriate and that it is better to develop case specific indicators⁴⁰; second, the widespread practice of informal continual evaluation of progress towards campaign goals such as through internal review of advocacy; and third, the difficulties associated with establishing a retrospective or predictive link between activities of an NGO engaged in policy advocacy and de facto changes in policy at local, national or global level (even if both the change in policy and relevant policy oriented activity by an advocacy organisation can be reliably established)⁴¹.

A further reason for the absence of external stakeholder oriented evaluation and feedback mechanisms for NGO advocacy may be that the claimed beneficiaries of advocacy activities are in reality often far removed from those organisations which act and advocate on their behalf, frequently using professional advocacy techniques and language which are not

⁴⁰ Global Interdependence Initiative (2005): *Advocacy for Impact - Lessons from Six Successful Campaigns*, Aspen Institute; and Chapman, J.; Wameyo, A. (2001): *Monitoring and Evaluating Advocacy - A Scoping Study*, ActionAid. See also www.innonet.org/ for an extensive list of advocacy evaluation toolkits from specific organisations.

⁴¹ Unerman, J.; O'Dwyer, B. (2005): *Theorising Accountability for NGO Advocacy*, in: *Accounting, Auditing & Accountability Journal* 19(3), pp. 349-376

readily accessible to beneficiaries. This distance makes it both harder for the advocacy organisation to effectively and credibly engage with its beneficiaries, and harder for the beneficiaries to seek involvement. In both cases the result, however, is that beneficiaries are excluded or at least very limited in their ability to express their views on the advocacy process as part of an evaluation cycle.

Finally, some particular types of beneficiaries, such as those served by environmental or animal rights advocacy groups, may be voiceless. In this case, the transparency of the evidence basis for advocacy becomes even more crucial as the use and integrity of natural or social science research results replaces claims to legitimacy based on representation. In turn the tools to evaluate impact of advocacy used in these context need to reflect the different nature of beneficiaries and how accountability is established⁴².

However, it is not only claimed beneficiaries who should have the opportunity to provide feedback on advocacy campaigns. Mechanisms should, as a matter of principle, be developed to allow members of the public and policy makers targeted by the campaigns to provide feedback on them. In addition to the normative incentive to do this as ‘the right thing to do’, NGOs may wish to embrace this approach from an instrumental point of view, such feedback would assist advocacy organisations in honing current and developing future campaigns based on previous successes.

Finally, the mechanisms used to engage with substantive feedback on the content of advocacy should be separate to those used to address potentially problematic impact of advocacy activities on individuals or communities. Both should form part of the organisational evaluation and learning cycle.

Box 3: Good practice principles for accountability in evaluation and feedback management

- ✓ Advocacy processes are evaluated in terms of the transparency of evidence base, funding, strategy and prioritisation processes; and opportunities for stakeholder participation in decision making on advocacy objectives
- ✓ Criteria for impact assessment of advocacy are developed with key stakeholders and results communicated to them
- ✓ Specific feedback or complaint handling mechanisms are in place to engage with cases of concerns or comments on impact of advocacy activities on individuals

5.6 Problematic issues of more general nature

At a more general level, it is first surprising to see how few of the many hundreds of civil society self-regulatory initiatives at sector-level reviewed by the One World Trust address accountability issues in advocacy. That said, many organisations have begun to develop internal toolkits and recommendations to guide and help ensure consistent practice in their advocacy work in line with organisational mission and values. Examples include the Independent Sector Center for Lobbying in the Public Interest, ActionAid, Tearfund,

⁴² Johnson, C.; Whitty, B.; Hammer, M. (2008): Who do you work for? Establishing a better match between justifications of research and effective accountability to claimed beneficiaries, One World Trust Working Paper May 2008, One World Trust, London, p. 5f

InterAction, and CARE, and there is also a growing body of research literature⁴³ and practical guidance available on the evaluation and effectiveness of advocacy and lobbying activities⁴⁴. Although many of the organisational tools have yet to evolve into sector-wide approaches, this is an encouraging sign that the limited focus of self-regulation on accountability in advocacy could be changing. Yet much progress remains to be made before advocacy oriented self-regulation tools are available and used to strengthen accountability to the same degree as general codes of conduct and ethics⁴⁵.

Second, there also seems to be little awareness of learning opportunities. Many existing self-regulatory initiatives that address related issues, both in the NGOs field and beyond, offer valuable transferable elements on which an expansion of tools aimed at improving accountability in cause-based advocacy for NGOs could draw, such as from individual organisation specific tools, self-regulatory initiatives in other domains, such as professional lobbying, or advocacy for individuals. The issue of transparency in the use of funds for advocacy points into the direction of experiences to be drawn from self-regulation in fundraising, and finally academic accountability, quality assurance and ethics code can help to address accountability issues associated with transparency of the research basis for advocacy work.

Third, current self-regulatory initiatives display a widespread lack of specific measurable standards which would allow an assessment of how accountable an organisation is in the conduct of advocacy. Experiences gathered from parallel work on accountability principles for policy oriented research organisations suggests that beyond the reasons for a general reluctance amongst advocacy NGOs to commit to verifiable standards discussed above, some of this may also simply be down to many organisations not yet reflecting systematically on the benefits of a structured approach to accountability in advocacy, ideally undertaken together with peers as part of a self-regulation initiative, and how to go about a process of reform.

In the same way that the policy oriented research organisations we worked with in our project on accountability principles for research have found instrumental value in reflecting on and applying accountability principles across the different stages of their work⁴⁶, also advocacy organisations, will by inference be more effective if they are more transparent, more participatory and have more effective evaluation and feedback mechanisms for each of their work processes as their effectiveness relies crucially on the credibility of the evidence they use.

6 Conclusions and further questions

Based on an analysis of the contents of over 300 NGO self-regulatory initiatives, it is clear that NGO self-regulation to strengthen accountability of advocacy activities is still in its infancy. Initiatives addressing accountability issues arising in the context of advocacy

⁴³ Whitty, B. (2008): Accountability Principles for Research Organisations – Report and Toolkit, London, One World Trust

⁴⁴ www.innonet.org offers for instance an extensive list of toolkits and papers that can help with evaluating advocacy at an organisational level.

⁴⁵ Lloyd, R.; Warren, S. (2005): Civil society self-regulation - the global picture, One World Trust Briefing Paper No 119, June 2009, London, p. 8

⁴⁶ Whitty, B. (2008): Accountability Principles for Research Organisations - Report, London, One World Trust, p. 19 for an overview

specifically are few, tend to address the issue in only general terms, or have merely one or two points which focus on advocacy included in a broad code of conduct. The most common way to address advocacy for NGOs is for a code of conduct to require NGOs to engage in advocacy work alongside their other programmes, and to comply with legal lobbying standards. Very few codes have specific operational standards against which practice can be measured and reviewed. None address the issue of beneficiary participation in advocacy agenda setting, practice or evaluation. Questions of transparency of evidence basis are sidestepped by concentrating on conflicts of interest and how to avoid bias.

However, the review of existing self-regulatory initiatives allows the initial formulation of good practice principles that can be specifically applied to achieve greater accountability in advocacy. These include guidance on

- transparency of the evidence base used in advocacy, on funding and funders for specific campaigns and activities, and around forward looking information such as strategy, and the processes used to determine advocacy priorities;
- opportunities for participation of beneficiaries and other key stakeholders of the organisation in the development of advocacy objectives and their review; and
- the development of criteria for the evaluation of impact of advocacy with beneficiaries and other stakeholders, and the establishment of feedback and complaints handling mechanisms to address individual experiences and problematic impacts.

In addition, the review of several self-regulatory initiatives from within and without the narrower cause-based field of NGO advocacy such as the HIV/AIDS Self Assessment Tool or the Action 4 Advocacy Quality Performance Mark shows that there is a lot organisations can build on such as frameworks for engaging with issues of effectiveness of advocacy, detailed self assessment, and support for planning change and learning. Mainstreaming the use of good accountability practice principles in advocacy could gain momentum as NGOs involved in advocacy in new areas join in the effort.

Above and beyond the issues discussed in this paper, the review of existing NGO self-regulatory initiatives addressing advocacy activities shows that there are areas in which further research and practical work may be needed.

- First, advocacy organisations work with evidence on the basis of putting it to use in the context of normatively defined causes, which highlights the political nature of knowledge. In order to advocate effectively a discourse must be framed and constructed which presents the situation in a way to encourage change. This implies that imposing on advocacy organisations a requirement to present an always fully balanced presentation of evidence may be unreasonable, and could be counterproductive to their effectiveness. In addition to clearly separating fact from opinion, disclosing motivations and dependencies, and allow access to data and methods, it may therefore be both relevant and practical for self-regulation to address the question how a nearly inevitable remaining bias can be subject to clear boundaries, and how the omission of information which might contradict the cause being advocated can be appropriately declared.
- Second, the multiple dependencies and accountability relationships of policy oriented organisations, in particular in the civil society sector, to donors and regulators make it difficult for NGOs to maintain independence. NGOs need an enabling and free environment to productively deploy their expertise and contribute to the formation of public

policy. Yet, the understanding of what constitutes 'public benefit' or 'political work' by donors and regulators is often problematic and inconsistent with wider societal trends that frame the role of civil society organisations in democratic governance at national and global level. Addressing accountability issues through self-regulation may help overcome some artificial and antiquated constraints placed upon NGOs by the regulatory regimes under which they work.

- Third, at what point does fundraising become advocacy? The means of representing beneficiaries, causes and organisations in fundraising materials is often similar to advocacy work, and certainly reminiscent of information campaigns. While transparency of funding sources and any potential conflicts of interest between funder and NGO will add to the perception of advocacy as an accountable practice, there are clearly further implications of where funding is sourced and how advocacy projects are developed and implemented in connection with funders. In order to improve accountability in advocacy, more specific links to the ethics of fundraising could be made – demonstrating not only incompatibility but also addressing problems that may arise from undue influence.

Civil society organisations (CSOs) are facing increasing pressure to demonstrate their accountability, legitimacy and effectiveness. In response, a growing number are coming together at national, regional and international level, to define common standards and promote good practice through codes of conduct, certification schemes, information services, working groups, self-assessment tools, and awards. However, CSOs, donors and other potential users are often unaware of their existence, what distinguishes one initiative from another, the strengths and weakness and gaps in existing self-regulation. This makes it difficult for organisations to make choices around which initiative best suits their needs, and to develop good practice. The One World Trust's CSO self-regulatory initiatives project provides the first comprehensive inventory of such civil society self-regulatory initiatives worldwide, offers additional analytical resources and related advisory services.

7 Appendix

Table 2: Tabled overview of NGO self-regulation initiatives addressing advocacy related accountability challenges

Name	Host	Location	Accountability commitments concerning advocacy
Guia de Gestão Responsável para OSC (Guide of Responsible Management for Civil Society Organizations)	Parceiros Voluntarios (Volunteer Partners)	Brazil	<ul style="list-style-type: none"> • Commitment to engage in public interest advocacy • Transparent communications • Set out an established advocacy policy
Code of Ethics for Social Development NGOs and POs	NGO Forum on Cambodia	Cambodia	<ul style="list-style-type: none"> • Conduct advocacy in non-partisan ways
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)	Asociación ACCIÓN	Chile	<ul style="list-style-type: none"> • Commitment to engage in public interest advocacy • Transparency and accountability
Código de Ética (Code of Ethics)	Confederación Colombiana de ONGs (Confederation of Colombian NGOs)	Colombia	<ul style="list-style-type: none"> • Commitment to engage in the public policy process
Minimum requirements for information to be published on web page	ONGs por la transparencia (NGOs for Transparency)	Colombia	<ul style="list-style-type: none"> • Commitments to meet quality standards for advocacy (but not specific what this means)
Code of Ethics and Conduct for Egyptian NGOs	Coalition of Ngos in cooperation with WANGO	Egypt	<ul style="list-style-type: none"> • Ensure compliance with legal requirements
Code of Conduct for NGOs in Ethiopia	Christian Relief and Development Association	Ethiopia	<ul style="list-style-type: none"> • Signatory NGOs commit to lobby for change of government policy when necessary
How to make a transparent registration in the European Commission Register of Interest Representatives	Alliance for Lobbying Transparency and Ethics Regulation in the EU	EU	<ul style="list-style-type: none"> • Requires disclosure of the names of lobbyists • Asks for disclosure of details of finances involved in lobbying efforts • Asks for disclosure of the specific issues the member

			organisations lobby
Code of Conduct on Images and Messages	CONCORD; Dóchas; and Cercle de Coopération Luxembourg	Europe	<ul style="list-style-type: none"> Requires provision of information to ensure that pictures and messages are represented within the wider context
PASOS Project	Policy Association for an Open Society	Europe, Caucasus and Central Asia	<ul style="list-style-type: none"> Asks for the development of appropriate standards for public policy research and the sharing of best practice, but gives no specifications regarding what those standards are.
Une éthique partagée (A shared ethics charter)	Coordination SUD	France	<ul style="list-style-type: none"> Commitment to engage in public interest advocacy Commitment to promote international development human rights, and contribute to poverty alleviation
Code of Ethics of Civil Society Organizations	Foro Permanente de Organizaciones de la Sociedad Civil	Honduras	<ul style="list-style-type: none"> Sets out duty to engage in public interest advocacy Commitment to build civil society cooperation Commitment to provide alternative solutions to social problems and promote public goods
Charity Research Initiative	Copal Partners	India	<ul style="list-style-type: none"> No specific standards for advocacy, though some organisations assessed do engage in advocacy
Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organizations (NGOs) in Disaster Relief	International Committee of the Red Cross	International	<ul style="list-style-type: none"> Requires objective portrayal of the situation Asks for organisations to ensure respect for the dignity of people involved in disaster situations
Code of Ethics and Conduct for NGOs	World Association of NGOs	International	<ul style="list-style-type: none"> Requires unbiased use of information or disclosure of bias Asks not to represent speculation as fact.
International Non-Governmental Organisations (INGO) Accountability Charter	INGO Charter Secretariat at CIVICUS: World Alliance for Citizen Participation	International	<ul style="list-style-type: none"> Requires engagement in advocacy that is grounded in the mission of the organisation Asks organisations to promote public interests Requires signatories to put in place a complete policy for ethical engagement and definition of conflict of interests in advocacy.
The Code of Good Practice for NGOs Responding to HIV/AIDS	NGO Code of Good Practice Secretariat at the	International	<ul style="list-style-type: none"> Requires signatory organisations to engage in advocacy to change the legal environment in HIV affected communities

	International Federation of Red Cross and Red Crescent Societies		<ul style="list-style-type: none"> • Requires organisations to monitor and evaluate advocacy efforts • Proposes a self-assessment which deals with specific advocacy activities and factors which increase effectiveness of lobbying in the area of HIV/AIDS.
Code de déontologie des ONG au Mali (Code of Ethics for NGOs in Mali)	Fédération des Collectifs d'ONG du Mali	Mali	<ul style="list-style-type: none"> • Signatory NGOs commit themselves to engage with the government and promote the interests of their beneficiaries
Groupe de Réflexion et d'Action des Intervenants en Environnement du SECO-ONG (GRAINE)	Secretariat de Concertation des ONG Maliennes	Mali	<ul style="list-style-type: none"> • Commitment for signatory NGOs to engage in the public policy process
Code of Conduct for NGOs in Nigeria	Nigeria Network of NGOs	Nigeria	<ul style="list-style-type: none"> • Requires members to engage in civic education • Requires members to engage in public interest advocacy, specifically against social injustice • Commits not to advocate violence
CONSS Code of Conduct	Coalition of NGOs in Sokoto State	Nigeria	<ul style="list-style-type: none"> • Commits to accuracy of information published and used, including when trying to influence legislation
Ethical Guidelines for North/South information in Norway	RORG-Samarbeidet (Network)	Norway	<ul style="list-style-type: none"> • Formulates duty to engage in advocacy • Commits to provide independent and alternative sources of information in the public interest
Palestinian NGOs Code of Conduct	NGO Development Centre of Palestine	Palestinian Territories	<ul style="list-style-type: none"> • Commits to foster participation and democracy
CODE-NGO Covenant on Philippine Development	Partnership of Philippine Support Service Agencies Inc.	Philippines	<ul style="list-style-type: none"> • Commits to promote civic participation
Code of Conduct for Somali NGO Networks	Somali Civil Society	Somalia	<ul style="list-style-type: none"> • Commits to promote civic education of beneficiaries • Signatory NGOs are committed to cooperate with other NGOs in lobbying efforts • Sets out duty to establish a joint Lobbying and Advocacy Committee and rules of conduct for it
Accountability Self-Assessment Tools for	Minnesota Council of	USA	<ul style="list-style-type: none"> • Requires compliance with legal standards for advocacy and lobbying

Private Foundations	Foundations		<ul style="list-style-type: none"> • Commitment to effective charitable lobbying related to the mission and goals of the foundation.
Criteria for membership in Global Impact	Global Impact (formerly International Service Agencies)	USA	<ul style="list-style-type: none"> • Asks for engage in advocacy to promote the mission of Global Impact • Commitment to use accurate information
InterAction PVO Standards: Self-certification Plus	InterAction	USA	<ul style="list-style-type: none"> • Sets out clear standards regarding when participating NGOs will become involved in public interest advocacy • Sets of defined process for ensuring accountability • Commits to legal standards
Principles and Practices for Nonprofit Excellence	Minnesota Council of Nonprofits	USA	<ul style="list-style-type: none"> • Member organisations are required to <ul style="list-style-type: none"> ○ demonstrate awareness of public issues of concern to their beneficiaries ○ promote civic participation ○ comply with all legal requirements for lobbying ○ not use federal funds for lobbying purposes ○ set out a clearly defined advocacy policy
Standards for Excellence: An Ethics and Accountability Code for the Nonprofit Sector (and all licensed versions)	Maryland Association of Nonprofit Organizations / Standards for Excellence Institute	USA	<ul style="list-style-type: none"> • Asks for a written policy on advocacy • Commits signatory organisations to engage the public
Standards of Ethics for Nonprofit Organizations in Utah	Utah Nonprofits Association	USA	<ul style="list-style-type: none"> • Requirement of a written policy for advocacy • Commitment to base advocacy on factually accurate data
NGO Corporate Governance Manual	National Association of NGOs	Zimbabwe	<ul style="list-style-type: none"> • Recognises that so called 'Third generation' NGOs (advocacy NGOs) engage in advocacy, but no specific standards are set • Requires legal compliances of all NGOs

Table 3: Individual aspects of accountability in advocacy addressed by initiatives by type and count (basis for Figure 1)

Individual aspects addressed by the initiatives	Type of accountability commitment	Number of initiatives
Recommendation or requirement to engage in advocacy	Public and public interest action	16
Requirement for a written policy	Transparency on quality of evidence basis	6
Objectivity and accuracy of evidence base	Transparency on quality of evidence basis	6
Promotion of civic participation	Public and public interest action	5
Legal compliance	Compliance with ethical and legal standards	4
Organisations to which the standards apply might be engaged in advocacy but there are no specifications regarding advocacy activities	Public and public interest action	4
Promotion of public interest / social justice / public good	Public and public interest action	4
Transparency in fund use	Financial transparency	3
Disclosure of areas for advocacy	Strategic / forward transparency	2
Promotion of cooperation	Participation and cooperation	2
Provision of an alternative source of information	Public and public interest action	2
Respect for the dignity of people involved	Compliance with ethical and legal standards	2
Monitoring and evaluation	Evaluation and learning	1
Disclosure of bias	Transparency on conflicts of interest / independence	1
Non-partisan advocacy	Transparency on conflicts of interest / independence	1
Disclosure of names of advocates	Transparency on conflicts of interest / independence	1
Conflict of interest policy specific to advocacy work	Transparency on conflicts of interest / independence	1
Disclosure of source of funding	Financial transparency	0
Disclosure of source of research or data used to inform agenda	Transparency on quality of evidence basis	0
Beneficiary participation	Participation and cooperation	0