

Transparency Review

2014 pilot cohort report

In partnership with...



About Bond

Bond is the uniting force for the strength, influence and effectiveness of UK international development organisations. We're a membership body, bringing together more than 440 organisations across the country in the fight against global poverty.

We work to influence governments and policy-makers, develop the skills of people in the sector, build organisational capacity and effectiveness, and provide opportunities to exchange information, knowledge and expertise.

www.bond.org.uk

About NIDOS

NIDOS is the network in Scotland that unites the international development sector to promote effectiveness and collectively influence the policy agenda, with over 100 members.

Our aim is to strengthen the contribution of Scottish organisations to reducing inequality and poverty worldwide.

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Executive summary

Open, honest and active communication between non-governmental organisations (NGOs) and our stakeholders about the work we do, the decisions we make and the results we get is crucial. This kind of communication increases our transparency, builds greater accountability with the people we work with and increases the trust of partners and supporters.

Bond and NIDOS (Network of International Development Organisations in Scotland) have been supporting UK-based NGOs to become more transparent for some time. In recent years, Bond's work on transparency has focused mainly on supporting organisations to share information in a common format, using the International Aid Transparency Initiative (IATI). However, Bond and NIDOS are seeking ways of broadening their support because they recognise that there are many routes to greater transparency.

The Bond and NIDOS Transparency Review aims to help organisations learn about how open and transparent they are about themselves through the lens of the outsider looking in. It does this through examining organisations' websites – a key route for sharing information. NGO websites are primarily aimed at audiences in the global north and at funders or supporters rather than those who the organisation aims to support.

However, increasing internet penetration in the global south is increasing the diversity of NGOs' website users. This Review aims to help organisations understand their current practice compared to their peers, and to see in practical terms how they could become more open. It is not a comprehensive analysis of all dimensions of an organisation's transparency practice (for example it does not cover direct communications with "beneficiaries").

In 2014, a pilot cohort of 49 UK-based international NGOs' websites were examined for the Review. The cohort was comprised of 15 small NGOs (spending less than £500,000 per annum), 20 medium-sized NGOs (spending £500,000 to £5 million) and 14 large NGOs (spending over £5m). The group included 43 Bond members and 6 NIDOS members.

The Review consists of indicators developed from good practice guidelines and similar NGO transparency and accountability reviews in Europe and the US. The indicators covers four areas of practice: transparency policy, organisational information, governance and finance and activities and results. For each indicator, four scoring levels range from weak practice (0), minimum practice (1), good practice (2) and best practice (3). Overall scores have been calculated as a percentage out of a maximum score of 39 points.

Results

The total average score across the cohort is 47%. This equates to somewhere between "minimum practice" and "good practice" on the Review's scale. The lowest overall score in the cohort is 18% and the highest 77%, which indicates highly diverse practice between organisations. The highest scoring NGOs are Christian Aid, Plan UK and WWF. Publish What You Fund is the highest scoring medium-sized organisation and HealthProm is the highest-scoring small organisation.

Large organisations on average score higher than medium-sized organisations, who in turn score higher on average than small organisations. These differences are statistically significant. Nonetheless, within this average, **the best-scoring small organisations score higher than some medium or large organisations.** The methodology was designed so that achieving a high score does not require significant resources. This was so as not to disadvantage smaller organisations. However it is important to acknowledge that staff time constraints and competing priorities often make it more difficult for small organisations to achieve a high score on the Review.

We also find that organisations who receive DFID funding score higher on average than those who do not. DFID has been a prominent promoter and advocate of transparency in recent years. Furthermore, organisations with strategic, flexible DFID funding (Programme Partnership

Arrangements) score higher on average than those with restricted funding from DFID. These differences are also found to be statistically significant.

There are low scores on average on publishing evaluations and results of activities, and on the depth of information provided on organisations' activities. These indicators are important aspects of transparency because they can facilitate improved accountability, coordination and learning. High-scoring indicators are mainly in the governance/finance and organisational information sections. These include information on organisations' mission and values, their funders, the breadth of their activities and their accounts. The lowest scoring section on average is transparency policies.

The review also asks additional questions about organisations' publishing to the International Aid Transparency Initiative (IATI). Only four organisations score three or more out of five on these questions.¹ This suggests that most organisations comply with the conditions of their DFID grants by publishing to IATI, but do not offer any more information than the minimum required.

Each organisation in the pilot cohort has been given a detailed report of their own results along with tailored recommendations for improvements. This overall Review report complements the individual reports by showing average scores per indicator for the cohort. As the Transparency Review is primarily a learning exercise for participating organisations, the report does not name individual agencies' scores, but does recognise specific examples of good practice. This was at the request of participants and is intended to help organisations to make improvements since for many this is a relatively new area of focus.

Bond and NIDOS will carry out another set of reviews for a new cohort of organisations in Spring 2015. A third cohort in late 2015 will aim to include members of the first and second cohorts to see what progress has been made.

Key recommendations for organisations

Be more consistent about publishing information about results. Systematically publish evaluations of completed work. It is important that the sector improves communication of its results and has the self-confidence to show that it learns and improves, and sometimes this involves failing.

Develop and publish an open information policy with tightly-defined reasons for excluding sensitive information. This can be done relatively quickly and the level of detail scaled to suit the size of the organisation.

Share more information on local partners, especially where they are responsible for implementing projects, in order to build transparency and accountability towards those people involved on the ground.

Small organisations in particular may wish to prioritise low-cost actions like publishing or linking to existing documentation on activities (e.g. project proposals, evaluations and organisational accounts) and reusing information from their Annual Report and Accounts on their website.

Set and track targets for improving scores in future Transparency Reviews.

Publish at least as much information about senior staff as about trustees.

Provide web content for stakeholders in developing countries as a standard part of your target audience e.g. service users, local partners, local and central government.

Key recommendations for Bond and NIDOS

The reviews also highlight some key actions for Bond and NIDOS to support NGOs to improve transparency practice. These include:

Share learning across organisations on the advantages of being open about project results and evaluations and the wider benefits of transparency, for example through the Bond network's Transparency Working Group. Actively encourage discussion around learning from failure.

Help NGOs to develop open information policies and to learn from each other, including sharing examples of good practice and developing a template policy.

Provide information to small organisations on how to source pro bono or low cost support for website development.

Work with donors to share lessons on appropriate ways to promote transparency among their grantees.

Support further and broader sharing of information using IATI. Encourage use of IATI data to inform project plans and objectives through sites such as Development Tracker
<http://devtracker.dfid.gov.uk>



1. Introduction

Since 2011, Bond and NIDOS have worked on transparency issues mainly via the International Aid Transparency Initiative (IATI) with DFID and UK-based international NGOs. With the introduction of the UK Government's "UK Aid Transparency Guarantee",² recipients of DFID funding have been required to publish information to the International Aid Transparency Initiative. DFID has funded Bond and NIDOS to provide their grantees with technical support to do this.

As a lever to promote greater transparency, the contractual requirement to publish to IATI has been partially successful. While Bond has supported over 150 organisations to publish some information to IATI, only about a third of them have so far voluntarily published more than the minimum required by DFID. Bond and NIDOS are keen to facilitate and overcome barriers to greater transparency within the sector, and the Transparency Review aims to encourage this.

Sharing information publicly about organisations' activities is assumed to be beneficial in four main ways:

- Stakeholders are more able to hold organisations to account for their activities and results
- Sharing information (particularly in a common format) can enable better coordination of activities between development actors
- Sharing information on activities and results can enable greater learning between actors
- Greater openness can help build greater public trust³ in NGOs

The Transparency Review examines organisation's openness through their websites. The Review⁴ articulates different elements and degrees of online transparency. It aims to help organisations understand how open they are currently, how they compare to peers, and what simple – and relatively low-cost – steps they can take to be more open. Through this process and follow-on activities, we hope to support more organisations to share more information about their organisations, activities and results.

Why look at websites?

Websites are just one route by which organisations can be transparent, but they are not accessible to all NGOs' stakeholders. Our decision to focus on websites was pragmatic: they are an important window into organisations and they are easy to see, review and compare.

With the spread of technology and growing internet penetration, websites are increasingly accessible to NGOs' southern stakeholders too, even if they are often designed with supporters in the north in mind. Other forms of transparency to service users or "beneficiaries" which are not covered by this Review are potentially more important routes for increasing downwards accountability.

2. Methodology

The indicator list for the Transparency Review was drawn up in an iterative process between March and May 2014 by Bond and NIDOS. Initially, the team reviewed existing transparency and accountability reporting processes and standards to ensure the Transparency Review was consistent with other initiatives (such as the INGO Charter of Accountability, the Humanitarian Accountability Partnership standard and the England and Wales Charity Commission requirements). With a range of partners, the team developed and discussed draft indicator lists and descriptions for levels. These partners included Publish What You Fund, Transparency International and other members of Bond's Transparency Working Group. Bond tested drafts of the tool on its own and other organisation's websites to identify possible ambiguity in language used in the Review and practical challenges in determining scores based on information available on organisations' websites.

Four progressively better levels of openness were identified and defined for each of the 13 indicators. Each level corresponds to these categories:

- Level 0 = weak practice
- Level 1 = minimum practice
- Level 2 = good practice
- Level 3 = best practice

Level 3 on all indicators should be achievable for any type or size of organisation, but only if the organisation made transparency a high priority.

2.1 Sections of the transparency review

Section	Information reviewed
Section 1: Transparency policies	Policies linked to transparency, for example an Open Information policy.
Section 2: Organisation information	Information describing an organisation, for example the Mission and Values.
Section 3: Governance and Finance	Funding and decision-making processes within the organisation.
Section 4: Activities and Results	International projects and programmes (activities) and results and evaluations.
Section 5: IATI	IATI (International Aid Transparency Initiative) data. Note: this is not included in the final scores as not all organisations use IATI.

Participants for the first cohort were invited to sign up in June 2014. As this was a pilot round, the assessment was offered for free to Bond and NIDOS members, and on a paid basis for non-members. Participation was capped at 50 organisations, and one organisation subsequently dropped out, leaving a cohort of 49 organisations. This was made up of 43 Bond members and six NIDOS members⁵.

Cohort participants by annual organisational expenditure ⁶	Number in cohort	Grouped by size
Under £100,000	5	Small = 15
Between £100,000 and £500,000	10	
Between £500,000 and £2,000,000	14	Medium = 20
Between £2,000,000 and £5,000,000	6	
Between £5,000,000 and £20,000,000	4	Large = 14
Between £20,000,000 and £40,000,000	3	
Over £40,000,000	7	
Total	49	

To carry out the assessment, Bond recruited a team of six volunteers who were current or recent Masters' students in subjects relevant to International Development. Volunteers were unaffiliated to

organisations participating in the Review. The volunteers were given a half-day of training and received one-to-one feedback on a worked example of using the review. Volunteers carried out their assessments in July and August.

In September, Bond staff conducted cross-checks on a sample of six assessments to compare their scores with the scores provided by assessors. These cross-checks found a degree of inconsistency in scoring between assessors for some indicators. Two indicators (“Active Sharing of Information” and “Timeliness of Publication of Information on Activities”) were found to be too hard to interpret consistently based on information from organisations’ websites and thus were dropped. In two other cases, there was inconsistency in interpretation of the same indicators, but a consistent basis for interpretation could be defined via the cross-checks. In a limited number of cases, the assessor had not sufficiently explored organisations’ websites to find information that was present. To ensure a sufficient degree of confidence in the results, Bond staff re-assessed all 49 organisations. This took place in September/ October 2014.⁷

How transparent is Bond itself?

While developing the tool, Bond tested an earlier version of the Review on its own website. A key weakness uncovered for Bond was a lack of an Open Information Policy. This result prompted Bond to develop such a policy, which was approved in October 2014 and has now been published on Bond’s website. On most other indicators Bond scored level 2, indicating that there is still room for improvement.

Individual reports were drafted for each organisation, showing the assessment results and citing the webpages and rationale upon which scores were awarded for each indicator. Organisations were then given the opportunity to challenge scores if they felt something had been missed or incorrectly assessed. A third of organisations responded to that opportunity, with half of those challenging a score, typically only on a single indicator. Challenges typically related to information that the organisations felt had been missed by the assessors.

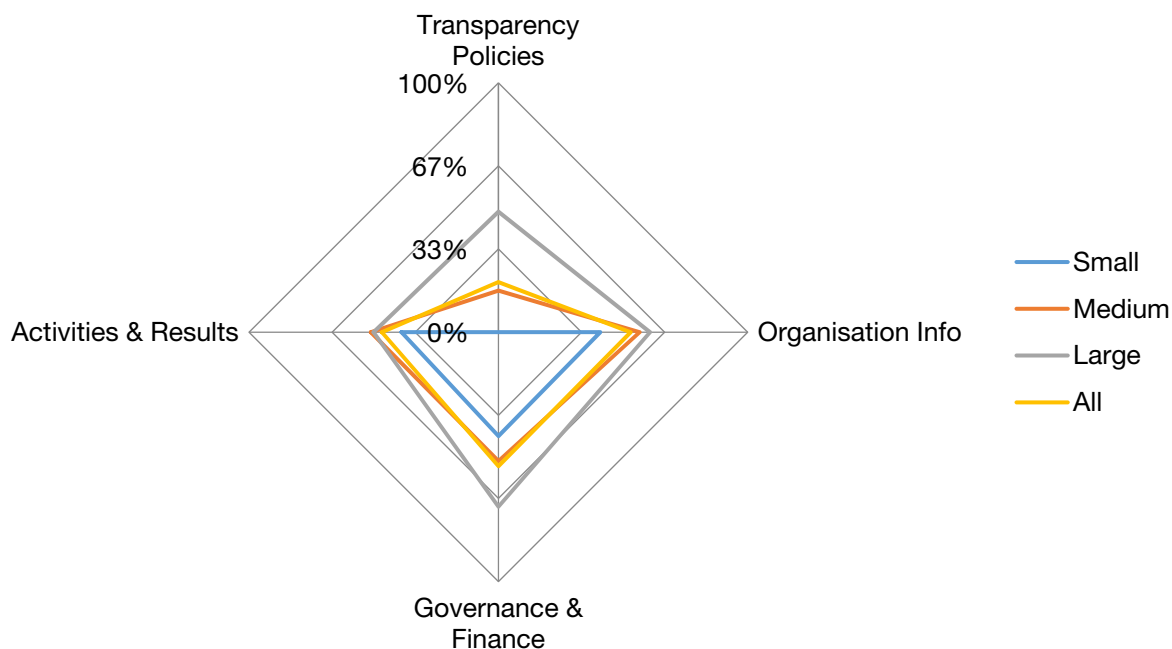
Individual scores were then finalised in November 2014 and individual ranking within the cohort on each indicator and section was calculated. Final individual reports were sent to organisations in December 2014 and January 2015, which included tailored recommendations for improving scores.

3. Headline results

The average total score across the entire cohort is 18.2 out of a maximum of 39, or 47%. It is important to remember that scores were calibrated so that one out of three meant “minimum practice” and two out of three meant “good practice”. So our overall average score means that organisations typically achieve between “minimum” and “good practice”.

Average scores	Small organisations (<£500k; n=15)	Medium organisations (£500k - £5m; n=20)	Large organisations (>£5m; n=14)	Total cohort (n=49)
Transparency policies	0%	17%	48%	20%
Organisational information	41%	57%	61%	53%
Governance & finance	42%	52%	70%	54%
Activities and results	39%	51%	50%	47%
All sections	34%	47%	59%	47%

The highest average scores are achieved in the Organisational Information and Governance & Finance sections, which cover issues that are most likely to be found in a typical “About Us” section of an organisation’s website and in their annual accounts. The “Activities and Results” section has a mixture of high-scoring and low-scoring indicators. Organisations do well on breadth of publishing about their activities, but much less well on the depth of information on activities and on results, which are key aspects of transparency for accountability, coordination and learning purposes.



The greatest scope for improvement is around making organisations’ Open information/transparency policies public (if they even have such policies), and ensuring that within those policies there are relatively narrow definitions of what gets excluded from publishing.

The five highest scoring indicators (out of a maximum score of 3) are:

1. Mission, values and affiliation (1.9)
2. Information on funders (1.9)
3. Information on organisational strategy (1.8)
4. Breadth of information of activities (1.8)
5. Publishing of annual accounts (1.7)

The five lowest scoring indicators (out of a maximum score of three) are:

1. Scope of exclusions from open information policy (0.6)
2. Publishing of open information policy (0.7)
3. Publishing of evaluations (1.1)
4. Information about senior management team (1.2)
5. Information about partners (1.3)

The results show that on average, an organisation’s size affects how transparent it is through its website. While only limited resources are required for an organisation to achieve scores of two or three on most indicators, medium and large organisations on average scored higher than small organisations on all indicators. These differences were found to be statistically significant.⁸ However, it is important to note that the highest-scoring small organisations scored higher than a number of medium and large organisations, showing that it is possible for small organisations to match and

out-perform larger organisations. Reasons for the average difference have not been further investigated in the Review, but Bond’s and NIDOS’s wider engagement with members on transparency suggests that other management issues and demands facing small organisations mean that finding the staff time required to prioritise transparency is a major challenge. Also small organisations are less likely than medium and large organisations to have funding from institutional donors, some of whom (e.g. DFID) require a higher degree of transparency.

As DFID has strongly promoted transparency in recent years, scores were also disaggregated by type of DFID funding accessed by different organisations. DFID funding was split into two types: restricted grant funding (e.g. via the Global Poverty Action Fund/ UK Aid Direct or the Girls Education Challenge) and strategic flexible funding (Programme Partnership Arrangements - PPAs). Recipients of both types of funding are required to publish information on their DFID-funded activities to IATI. However, those with PPAs are also required to report more broadly on their work to increase their transparency and have the option of using some of their PPA funding to support this.

Average Scores	No DFID Funding	GPAF/ GEC (Restricted)	PPA (Flexible)
Small (<£500k)	31% (n=11)	46% (n=4)	n/a (n=0)
Medium (£500k - £5m)	43% (n=8)	50% (n=7)	50% (n=5)
Large (<£5m)	n/a (n=0)	44% (n=3)	63% (n=11)
Average - All	36% (n=19)	47% (n=14)	59% (n=16)

Those organisations receiving PPA funding score highest on average on the Review. Those receiving restricted DFID funding on average score below those with PPA funding, but above those without DFID funding. There is clear and statistically significant⁹ relationship between receiving DFID funding and online transparency. However, it is acknowledged that causality may run in both directions: DFID require their grant recipients to be more transparent, but more transparent organisations may be more likely to receive DFID funding. Two organisations in this cohort who do not have DFID funding reported to Bond and NIDOS that they were trying to increase their transparency to make them more attractive to DFID as prospective grantees.

Although detailed scores for individual organisations are not being published, the top scorers are listed below because they can serve as examples for other organisations can learn from. Our overall top three scorers¹⁰ were:

1. Christian Aid (www.christianaid.org.uk)
2. Plan UK (www.plan-uk.org)
3. WWF (www.wwf.org.uk)

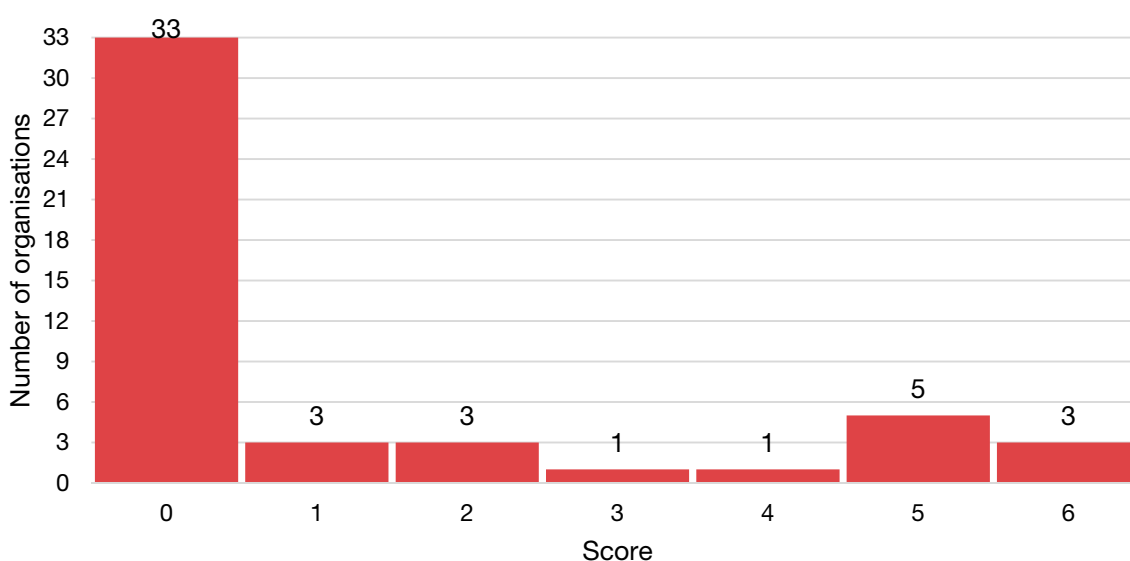
All three organisations are large. Among the medium-sized organisations, the top scorer is Publish What You Fund (www.publishwhatyoufund.org). HealthProm (healthprom.org) is the top-scoring small organisation.

4. Detailed results

4.1 Transparency policy

Indicator	1.1: Publication of open information policy	1.2 Exclusions from open information policy
# Scoring 0	35	36
# Scoring 1	5	2
# Scoring 2	0	8
# Scoring 3	9	3
Average score (out of 3)	0.7	0.6

Distribution of total scores on transparency policy (max=6)



Having an open information policy is an important step towards taking a systematic approach to transparency. It helps others hold you to account by letting them know what information you are willing to provide.

The Transparency Policy section has the two lowest scoring indicators in the Transparency Review. Of the 49 organisations assessed, 35 (71% of cohort) make no reference on their websites to having an open information policy. This does not necessarily mean that they do not have such a policy. A further five organisations indicate on their websites that they do have a policy, but it is not published there.

The second indicator in this section refers to what organisations explicitly say in their open information policies that they will not publish, i.e. “exclusions”. Many organisations automatically score 0 because they do not publish an open information policy. If we only count the scores of those who did publish their open information policies, the average score for this indicator would have been 1.9. This most closely matches our definition for “good practice” (level 2), where most information is made available, but some is excluded for legal or security reasons or narrowly-defined commercial reasons.

Good practice: what gets excluded from open information policies

Typically, clauses in open information policies on “commercial sensitivity” may allow an organisation discretion to exclude information that could “harm their financial interests or those of other parties involved”. Our assessment gives lower scores for those whose policies phrase “commercial sensitivity” in such a broad way that it gives the organisation discretion to not publish anything negative about themselves that might harm their fundraising prospects (for example an evaluation that showed poor project performance, or financial information showing very high overheads).

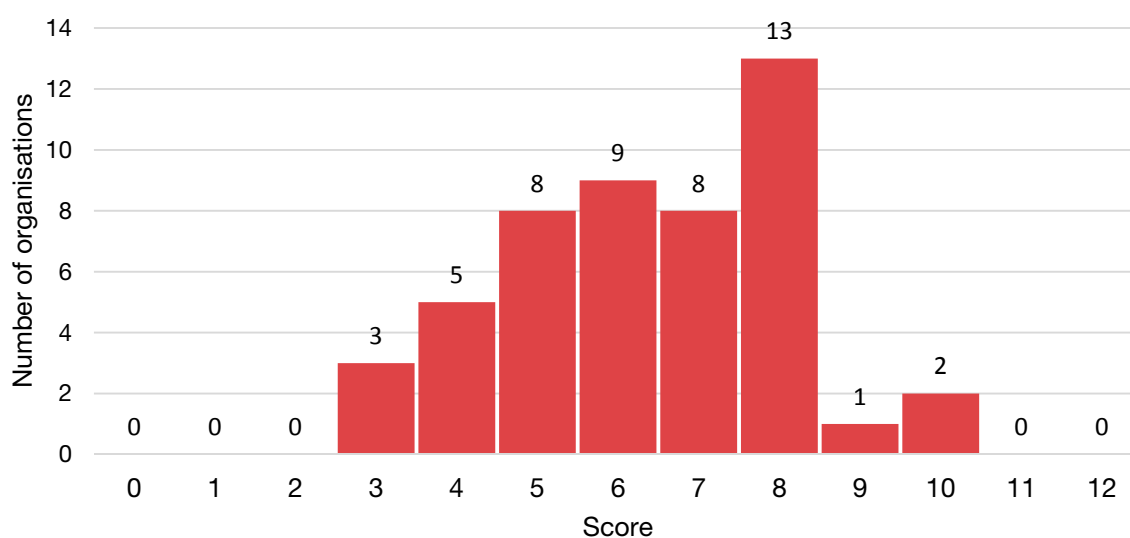
In a world of competitive bidding for grants and contracts, however, there are types of commercially sensitive information that, if shared with competitors unilaterally, could put organisations at a disadvantage in bidding. This could include detailed unit costs for activities and salary costs. The top-scoring organisations in our cohort qualify the “commercial sensitivity” clause to try to limit it to such circumstances. Plan UK’s policy is one such example: <http://www.plan-uk.org/assets/Documents/pdf/Plan-UK-Open-Information-Policy>

4.2 Organisation information

This section looks at whether organisations provide clear information on their mission, values, affiliations, strategy, partners and contact details.

Indicator	2.1 Mission, values & affiliation	2.2 Strategy	2.3 Contact information	2.4 Partners
# Scoring 0	0	4	0	3
# Scoring 1	10	15	36	32
# Scoring 2	34	16	9	10
# Scoring 3	5	14	4	4
Average Score (out of 3)	1.9	1.8	1.4	1.3

Distribution of total scores on organisational information (max=12)



On information on missions, values and affiliation, 69% of organisations score level two. This indicates that while clearly spelling out their missions, values and affiliation, the organisations fall short by not providing details of all organisations or bodies of which they are a member. For this indicator, 10% of organisations achieve the top score and no organisations score 0. Overall, this is the joint highest scoring indicator on across the assessment, along with “information on funders”.

A strategy document is an important bridge between the organisation’s mission and the specific activities that it carries out. Assessors examined whether any strategy is published on organisations’ websites, and if so whether it is published in full and/ or in summary. Only four organisations publish no strategy, while the remaining 45 are almost evenly split between those who publish only a summary version, only the full version, or both.

The contact information indicator considers whether an organisation provides basic means of getting in touch and – at the top end of the scale – whether they commit to respond to queries within a defined timeframe and whether they publish “frequently asked questions”. All organisations provide some contact details, but 73% of them only provide the basics (address, phone number, email address). A further 18% give a commitment to respond within a specified timeframe. Four organisations display best practice by also publishing responses to Frequently Asked Questions (Save the Children, Plan UK, CAFOD and WWF).

Best practice: information on partners

Although hard to find on their website, Christian Aid’s approach to making information available on their partners is particularly equitable and open. Within each country page under “What We Do”, there is a map with a pin for each partner. Clicking on the pin provides a links to the partners’ website (if available) and gives information on the project(s) that they work on with Christian Aid. See for example: <http://www.christianaid.org.uk/whatwedo/africa/mali.aspx?Page=2>

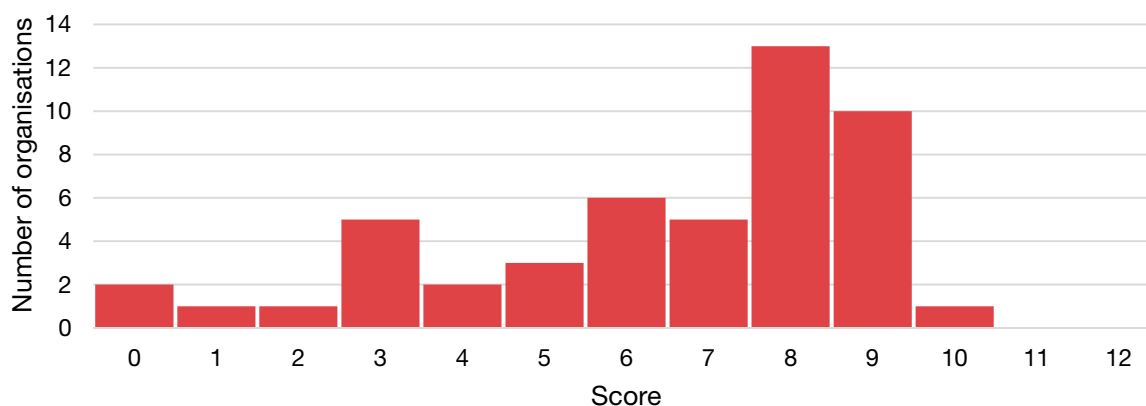
Most international NGOs work with southern partners to a greater or lesser extent. The partnership indicator assesses how much information is shared about their partners. Only three organisations provide no information on their partners. The most common score was level one (minimum practice), with 65% of organisations providing some information on their partners, but not enough to determine how comprehensive it is. One in five organisations provide information on a majority of their partners, including which activities the partners work on. Four organisations display best practice by providing a full list of their partners and the projects they worked with them on (see boxed item for a description of Christian Aid’s practice in this area).

4.3 Governance and finance

Governance and finance is the highest scoring of the four sections in the Transparency Review. It covers information shared by organisations about their Trustee Boards and senior staff, their finances and their sources of funding. Some of these indicators are aligned with minimum reporting standards required by the Charity Commission, which may contribute to the relatively high scores. Transparency in these areas is important in helping establish organisations’ legitimacy with external actors, as they relate to who runs the organisation and who funds it.

Indicator	Trustee boards	Senior management	Annual audited accounts	Partners
# Scoring 0	3	7	7	10
# Scoring 1	11	24	3	7
# Scoring 2	35	18	38	10
# Scoring 3	0	0	1	22
Average Score (out of 3)	1.7	1.2	1.7	1.9

Distribution of total scores on governance and finance (max=12)



Regarding trustee boards and senior management teams, the indicator levels range from no information being provided, through to a complete list with biographies and a formal register of interests. No organisations achieved level three “best practice” on either of these indicators, as no organisations publish a formal register of interests for their trustees or senior managers.¹¹

For trustee boards, 71% of organisations display good practice (level two), indicating that they give a full list of trustees with a brief biography. Only slightly over a third of organisations provided the same level of detail on their senior managers who are tasked with the day-to-day running of the organisation. It is more common simply to list the names of senior managers (minimum practice, level one). Only 6% and 14% of organisations provide no information at all on their websites about board members and senior managers respectively.

On Annual audited accounts, 78% of organisations display good practice (level two) which means publishing their full audited accounts on their website. For NGOs registered in England and Wales, such documents are required to be public by the Charity Commission for England and Wales. They are all available through the Charity Commission’s website, so it is easy for organisations to simply publish the same document or link to the Charity Commission site on their own website. The Scottish Charities Regulator on the other hand only publishes links to accounts if the charity has already published them on its own website. Seven organisations in the cohort (two from Scotland, five from England) provide no information at all on their accounts on their website, which would in most cases would be easy to fix. Only one organisation – Publish What You Fund – publishes its accounts in a format which would allow users to do their own analysis – in this case via IATI - and thus scores level three. In almost all other cases, accounts are either in PDF form or in a webpage format that make the accounts easier to interpret (e.g. using a lot of graphics) but still closed to further analysis.

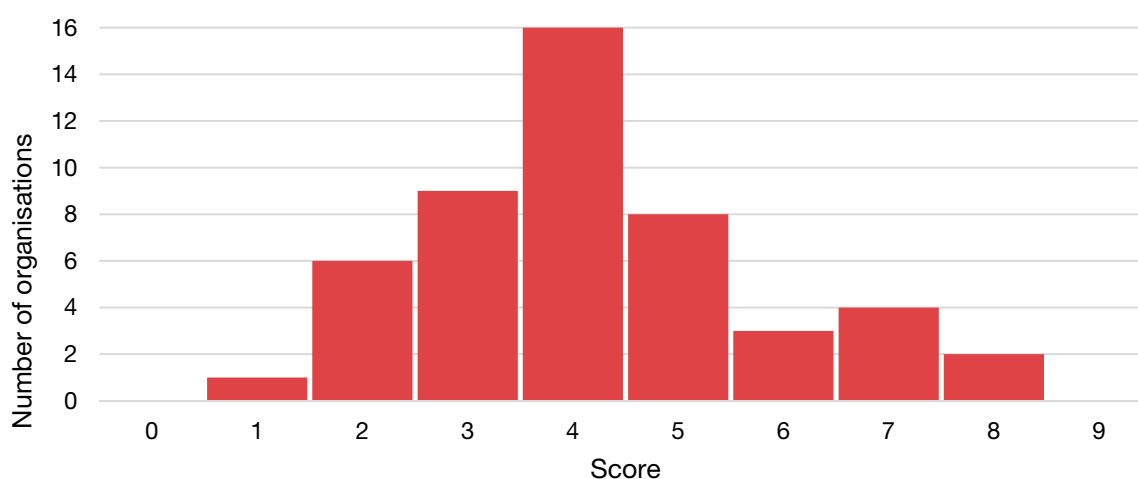
The indicator on openness in naming funders gives a “minimum practice” score of one to those organisations that publish information on their website that meets the Charity Commission minimum standards for details of funding sources. The highest possible score goes to those who go beyond that to individually name all institutional donors, trusts, foundations and corporations who contributed more than £10,000 or more than 20% of an organisation’s total income. On openness in naming funders 45% of organisations score top marks, making it the joint highest scoring indicator across the whole assessment. One in five organisations provide that level of detail for their institutional donors, but not for other types of donor. The remaining 20% provide no information at all on their websites on their sources of funding. In one case, this is because the organisation is the international arm of a bigger UK charity and it was not possible to tell from the accounts what money went to the international arm. In another case, the organisation is new and had not yet completed its first set of annual accounts.

4.4 Activities results

Expectations around publishing information on organisations' activities and results have been gradually increasing over recent years. Initiatives like the Humanitarian Accountability Partnership and IATI have prompted some organisations to more systematically share information on their activities. The combination of the "results" agenda and increasing public and donor expectations that charities explain what they have been achieving also requires them to be more open about their results.

Indicator	Scope and breadth of info on activities	Depth of info on activities	Scope of info on evaluations and results
# Scoring 0	1	0	11
# Scoring 1	17	40	24
# Scoring 2	22	2	13
# Scoring 3	9	7	1
Average Score (out of 3)	1.8	1.3	1.1

Distribution of total scores on activities and results (max=9)



On scope and breadth of publishing of information about their activities, 45% of organisations display good practice (level two). This indicates that information is provided on the majority of an organisation's activities. Achieving best practice (level three), 18% of the organisations publish information on all their activities. Just over a third either publishes information on a minority of their activities or the proportion is unclear (level one). Only one organisation publishes no information on their activities beyond highly summarised or general information (level 0).

Evaluations: best practice

The top-scoring organisation in this cohort on publishing evaluations is the Minority Rights Group. Demonstrating that publishing evaluations does not need to be resource intensive, MRG provides a list of all their evaluated projects, with links to a summary of findings and the full report. Given the sensitive nature of some of MRG's work, they omit sensitive information such as the names of partners, individuals and specific locations within a country when this could pose a security risk, rather than excluding the entire report.

See: <http://www.minorityrights.org/8072/evaluations/evaluations.html>

The depth of the information published was also examined, ranging from no information, summary information only (minimum practice), through to full project documents (good practice) and project documents with a summary (best practice). A high proportion - 82% of organisations - only publish summary information on their activities. While this sort of information is clearly valuable for marketing purposes, it is in most cases of limited value for enhancing coordination, learning and accountability. Two organisations provide full project documents on project activities, while a further seven (14% of cohort) produced both full documents and summaries, providing a good blend of depth and accessibility for different users.

Publishing results of activities is a particularly key aspect of transparency as it relates to accountability. It is the only indicator in the Transparency Review covering information about what organisations achieve. Although different organisations may talk about results in different ways, this indicator focuses on evaluations of completed projects and on outcomes data. Other than the indicators relating to open information policies, this is the lowest scoring indicator across the cohort, with an average of 1.1 out of three. Low scores for organisations may in some cases reflect that evaluations and outcomes data are not available in the first place for all projects, rather than reflecting a lack of commitment to being open about results. Either reason should be a cause for concern. Less than a quarter of organisations (22%) publish no information at all on their websites about their results; marketing materials were not counted. Almost half (49%) publish results of only a minority of their activities and 27% publish results for a majority of their activities. Only one organisation – Minority Rights Group International – publish results information on all their completed activities (see boxed item).

Publishing on activities and results: is less more?

The indicators on activities and results have been the most contested among the 13 in the Transparency Review. Two of the three indicators in the Review reward volume of publishing rather than accessibility (i.e. publishing full reports scores higher than publishing just a summary), and it has been pointed out that there are a wider range of ways to share information and learning than the publishing of often dry and long project documents and evaluations.

While accessibility is important for the utilisation of information, the Review chose not to focus on that dimension because:

- transforming information into the most accessible formats requires additional resources, in a way that simply posting existing documents does not; and the Review aims not to disadvantage small organisations
- if source documents and data are not published – particularly for information on results - it is not possible to check whether summaries and syntheses are an accurate and good quality reflection of actual findings.

5. Additional scores for IATI publishing

Publishing information to the International Aid Transparency Initiative (IATI) is one specific route to online transparency. IATI is a common data standard, and thus has the advantage of making information publishing by NGOs (and other publishers such as donor governments, multilateral agencies and international finance institutions) comparable. This makes the data potentially more useful, for example in gaining an overview of all aid provided across different actors in a particular country or sector. IATI is a voluntary initiative, although for recipients of DFID funding, it is now a condition of their contracts to publish a defined set of information on that funding to IATI.¹²

There were five additional “yes/no” questions included in the Transparency Review relating to IATI. These were designed to discover whether organisations went beyond the requirements of their DFID

grant. As only some organisations publish to IATI, these scores are reported separately and are not added to the total organisational scores for the Transparency Review. The additional questions on IATI are:

1. Does the organisation publish information about their planned or actual use of IATI on their own website?
2. Is there a link to the organisation’s strategy in their organisational file on the IATI registry?
3. Is information also available as IATI standard data for all development activities listed on the organisation’s own website?
4. Does published IATI data in each activity file cover all the data fields required by the IATI Standard (version 1.03)?
5. Does the organisation use the “results” fields of the IATI data standard to share information about the results achieved for each completed activity?

Score	Number / % of organisations achieving score
Not an IATI Publisher	16 (33% of cohort)
IATI Publisher, Scored 0/5	5 (10% of cohort)
IATI Publisher, Scored 1/5	11 (22% of cohort)
IATI Publisher, Scored 2/5	13 (27% of cohort)
IATI Publisher, Scored 3/5	4 (8% of cohort)
IATI Publisher, Scored 4/5	0 (0% of cohort)
IATI Publisher, Scored 5/5	0 (0% of cohort)

Of the 49 organisations assessed, 33 were registered as publishers in the IATI Registry. Five of those scored 0 on the IATI questions, with most of the rest scoring either one or two. Four organisations scored three (CAFOD, Excellent Development, Publish What You Fund and WWF). No organisations scored four or five. Those organisations which score one or two typically do so because they share information on their IATI publishing plans (e.g. an implementation schedule) or put a link to their IATI data on their own website, or because the data they publish on activities covers the minimum necessary fields for IATI.

IATI Question	Yes	No
Info about IATI publishing?	16	33
Link to organisational strategy?	3	46
Data on all activities listed on website published to IATI?	7	42
Activity data covers all relevant fields required by IATI?	23	26
Is the IATI “results” field used?	0	49

At the time of data collection, no organisations in the cohort were using the “results” field of IATI. Such publishing is not required within DFID’s standards for IATI publishing by their grantees, but also this is a relatively under-developed part of the IATI standard. Only seven organisations published information to IATI on all the activities listed on their website; most others indicated activities on their website for which there was no corresponding IATI data. This reflects a common practice of organisations only publishing information to IATI that they are required to by their DFID contracts, and not voluntarily publishing more widely. Only three organisations published their strategies to IATI.

With DFID funding, Bond provides support to organisations to publish to IATI to meet the UK Aid Transparency Guarantee. Bond’s experience suggests that the relatively low scores for these additional questions most likely reflects a combination of the practical costs and resource

requirements faced by organisations to publish to IATI and the lack of evidence to date of how published data is utilised.

6. Conclusions

Transparency is a foundation for accountability, learning, gaining trust and legitimacy. This first Bond and NIDOS Transparency Review sheds light on a key way that NGOs can make information openly available about their organisations: through their websites. While websites are by no means the only mechanism an organisation has to share information, they will only continue to grow in importance as the availability of internet access increases. This will broaden INGO websites' audiences and raise supporters' expectations of the information they expect to find on INGOs and their achievements.

The results of the Review are encouraging in that they suggest that there are many areas where good practice is already widespread (such as naming funders and providing information on organisations' activities). There are also many areas where individual NGOs demonstrate best practice that others could learn from. Some of the weakest scoring areas could be largely improved simply with more attention rather than significant financial resources. However, although there are exceptions, it is clear that smaller NGOs on average find it more difficult to address transparency alongside all the other calls on their limited staff time and resources. The relatively high scores among organisations that receive strategic, flexible funding from DFID suggest that a combination of encouragement, pressure and funding from a large donor can also enhance transparency.

Each organisation participating in the Review has received a tailored report with recommendations on how they individually could improve their scores.

For NGOs

Top priority recommendations

- Systematically publish evaluations of completed work. Being open about what organisations have achieved is at the heart of transparency for the purposes of increasing accountability, learning and trust. As this type of openness may reveal shortcomings, it is also perhaps the most concerning aspect of transparency for some. However, it is important that the sector improves communication of its results and has the self-confidence to show that it learns and improves, and sometimes this involves failing.
- Develop and/ or publish an open information policy or statement with clearly defined exclusions. Such a policy is the foundation for a consistent and committed organisational effort to improve transparency. Guidance and examples of existing policies, together with a template, are available on the Bond website.¹³
- Small NGOs with time and resource constraints should focus particularly on those aspects of transparency which involve the least additional work and that can complement existing strategic priorities like fundraising and profile raising. This might include publishing existing documentation on activities and results and linking to accounts information published on the Charity Commission website
- Organisations participating in the Transparency Review should individually set themselves targets for improvement in priority areas, and repeat the Review within a reasonable time period to confirm progress.

Medium priority recommendations

- Provide more information on southern partners and their role in INGOs' activities, including their contact details
- Publish at least as much information about senior staff as about trustees
- Consider matching the degree of openness on your own website with the extent of publishing of your data to IATI
- Increasingly consider stakeholders in developing countries among the target audience when developing organisational websites as the availability of internet access continues to increase. This will mean providing content that will be of interest to users such as service users, local partners, local and central government

For Bond and NIDOS

To support these recommendations, Bond and NIDOS commit to:

- Provide examples of open information policies suitable for different types and sizes of organisation along with advice to those aiming to develop them.
- Give information to small organisations on how to source pro bono or low cost support for website development.
- Signpost organisations to examples of good/ best practice websites (in terms of transparency) created by similar organisations.
- Share learning across organisations on the advantages of openness (particularly in relation to evaluations/results) and on managing the risks of openness, including through the Bond Transparency Working Group.
- Continue to support organisations to improve the quality of the monitoring, evaluation and learning to help increase organisations' confidence in publishing results.
- Work with donors to share lessons on appropriate ways to promote transparency among their grantees.
- Investigate opportunities to increase the usefulness of data published to IATI through data analysis and visualisation.
- Support existing IATI users to publish a greater proportion of their activities to IATI, where resources permit.
- Review and advise organisations on using additional fields (such as the results field) in IATI.
- Repeat the Transparency Review in spring 2015 and again in autumn 2015 to include new organisations.
- Support repeat organisations to monitor their progress in becoming more open.

7. Endnotes

¹ At the time of the pilot cohort, DFID had not officially published its field requirements for IATI.

² <https://www.gov.uk/government/policies/making-uk-aid-more-open-and-transparent/supporting-pages/uk-aid-transparency-guarantee>

³ The Edelman Trust Barometer for 2015 shows trust in NGOs in the UK has declined from 67% in 2014 to 51% in 2015 (<http://www.edelman.com/insights/intellectual-property/2015-edelman-trust-barometer/trust-around-world/>; see slide 8); NPC's "Matter of Trust" report (2014) highlights the role of transparency in building trust: <http://www.thinknpc.org/publications/matter-of-trust/matter-of-trust-final/?post-parent=12183>

⁴ The full Transparency Review tool is included as Annex 1 in this report.

⁵ See Annex 2 for the full list of participating organisations.

⁶ Based on total annual expenditure stated in accounts for the last recorded year. The bands used are Bond membership categories.

⁷ This re-assessment significantly delayed the timeline for reporting back to organisations in Cohort 1. Learning from this experience, for Cohort 2 it is intended that all organisations' websites will be reviewed by two assessors, and any differences in scores reconciled by Bond staff.

⁸ See Annex 3 for details of tests carried out for statistical significance.

⁹ See Annex 3 for further details.

¹⁰ It should be remembered that scores in the Transparency Review are not a wider judgement on the quality or presentation of organisations' websites.

¹¹ Transparency International, who were not part of this cohort, are the model for best practice in this area.

¹² The IATI requirements for NGOs and private sector suppliers were published on the DFID website on 6 February 2015: <https://www.gov.uk/government/policies/making-uk-aid-more-open-and-transparent/supporting-pages/international-aid-transparency-initiative-publishing-requirements-for-partners-of-dfid>

¹³ <http://www.bond.org.uk/transparency/open-information-and-ngos>

Annex 1: Transparency review indicators and scales

Section	Indicator	Level 0	Level 1	Level 2	Level 3
Transparency Policy	Open information/disclosure policy	There is no information on organisational transparency policy on the website.	The website indicates that a policy exists, but there is no information on it.	A summarised version of the policy is published on the website.	The policy is published in full on the website.
	Exclusions	We have widely-defined exclusions relating to commercial sensitivity and administrative burden which are open to interpretation; in practice, most information [not validly excluded due to legal or security restrictions] relating to our activities and results is excluded OR no information on exclusions is provided.	We have widely-defined exclusions relating to commercial sensitivity and administrative burden which are open to interpretation; we allow ourselves a lot of discretion about what is excluded or published.	We exclude information for legal or clearly defined security reasons, or for narrowly-defined commercial or administrative reasons; in practice most information is available.	We only exclude information for legal or clearly-defined security reasons.



Organisational Information	Mission, values and affiliation	No mission statement is published on the website.	A mission statement is published on the website.	A mission statement is published on the website; and a statement of principles, values and affiliation (e.g. religious) is also published/ included.	A mission statement is published on the website; and a statement of principles, values and affiliation (e.g. religious) is also published/ included, AND a list of bodies to which the organisation is linked or is a member is provided.
	Strategy	No information on strategy is published on the website.	A summary statement of strategic objectives is published on the website.	The full strategy is published/ available for download, but without a summary	A summary statement is published along with the full organisational strategy.
	Contact information	No information on how to contact the organisation is provided.	Information on how to contact the organisation using a variety of channels is provided.	Information on how to contact the organisation using a variety of channels is provided, along with a commitment to respond within a specified time period.	Information on how to contact the organisation using a variety of channels is provided, along with a commitment to respond within a specified time period, and questions and responses are published on the website.
	Partners	There is no published information on Southern/ implementing partners on the website.	There is published information on partners but it is not clear how many of the total number of partners is presented or only a minority of partners' names and contact details are published.	There is information available on the majority of partners the organisations works with, including the name and contact details, and a brief description of which projects they partner in.	A full list of partners is available on the website with contact information for each of them, as well as published information about the countries and specific projects they partner in.

Governance & Finance	Board/ trustees	No information on board members/ trustees is published on the website.	A list of board members/ trustees is published on the website or in a signposted Annual Report.	A list of board members/ trustees is published on the website or in a signposted Annual Report along with brief biographies.	A list of board members/ trustees is published on the website or in a signposted Annual Report along with brief biographies AND a register of their interests
	Directors	No information on directors/ senior managers is published on the website.	A list of directors/senior managers is published on the website or in a signposted Annual Report.	A list of directors/senior managers is published on the website or in a signposted Annual Report with a register of their interests.	A list of directors/senior Managers is published on the website or in a signposted Annual Report with a register of their interests AND with the salary level of the CEO (or other) highest paid member of staff.
	Audited annual accounts	No audited/ externally examined annual accounts are published on the website.	A summary of audited/ externally examined annual accounts is published on the website.	The full audited/ externally examined annual accounts are published on the website (doc/ PDF).	The full audited/ externally examined annual accounts are published on the website, and are available in a way that can be navigated or further analysed by users.
	Naming funders	Information below statutory minimum requirements is provided on sources of funding.	Minimum statutory requirements are provided on sources of funding (i.e. categorised by source, restricted/ unrestricted etc.)	Names of all institutional donors donating >£10,000 or >20% of total annual income are included in published accounts or on the website.	Names of all institutional donors, trusts, foundations and corporations donating >£10,000 or >20% of total annual income are included in published accounts or on the website (except any excluded by anonymity).



Activities and Results	Scope and breadth of publishing on activities funded by the organisation	There is no information on specific projects/ activities published on the website (e.g. only references to sectors/ locations of work, and only highly summarised references to specific projects [primarily for marketing purposes]).	Information is published on a minority of the NGOs' projects/ activities by value (measured as share of total organisational expenditure), or there is information published but it is not possible to determine how much of the organisations' activities are covered.	Information is published on a majority of the NGOs' projects/ activities by value.	A full list of the NGOs' projects/ activities is available on the website, with information published on all projects.
	Quality and depth of publishing (per published project/ activity)	There is no information published on projects/ activities.	Summary information only per published project/ activity is provided.	The project/ activity proposal or implementation plan only is provided.	The project proposal or implementation plan plus a summary are provided.
	Scope/ breadth of publishing on evaluations and results of completed activities funded by the organisation	There is no information on the results of specific completed projects or activities published on the website (e.g. only unspecific or unverified references to the organisations' achievements).	Evaluations or outcome data are published on a minority of the NGOs' projects or activities by value completed since a given date, or there are evaluations and outcome data published but it is not possible to determine how much of the organisations' activities are covered.	Evaluations or outcome data are published on a majority of the NGOs' projects/ activities by value.	A full list of the NGOs' projects/ activities is available on the website, with evaluations or outcome data published on all projects/ activities recorded as completed.

Annex 2: Statistical significance of differences within the cohort

The cohort for this assessment of 49 organisations is large enough to carry out tests of statistical significance on the differences between total scores of organisations based on size and based on receipt of DFID funding. T-tests* were carried out on the total results of different groups. Differences in total scores based on size and on receipt of DFID funding were found to be statistically significant. Details of the results are as follows:

Organisational Size

- Medium-sized organisations score significantly higher than small organisations ($t(39) = 3.28, p=0.002$).
- Large organisations score significantly higher than small organisations ($t(39) = 6.02, p<0.001$).
- Large organisations score significantly higher than medium-sized organisations ($t(39) = 2.72, p=0.01$).

Receipt of DFID Funding

- Organisations with DFID funding score significantly higher than organisations without any DFID funding ($t(39) = 5.03, p<0.001$).
- DFID PPA-holders score significantly higher than organisations with no funding from DFID ($t(39) = 5.42, p<0.001$).
- Organisations with just restricted funding DFID score significantly higher than organisations with no funding from DFID ($t(39) = 3.06, p=0.005$).
- DFID PPA-holders score significantly higher than organisations with just restricted grants from DFID ($t(39) = 3.17, p=0.004$).

* A t-test compares arrays of numbers (in this case total scores in the Transparency Review of different types of organisations) to determine the likelihood of differences between them being related to chance or not. Where the resulting p-value is <0.05 , it means that there is a greater than 95% probability that the difference is not related to chance and is thus statistically significant.



Annex 3: Participating organisations in the 2014 pilot cohort

AbleChild Africa	Population Matters
ADD International	Population Sustainability Network
African Initiatives	Publish What You Fund
British Red Cross	Restless Development
CAFOD	Retrak
Care International UK	Samaritan's Purse UK
Chance for Childhood	Save the Children UK
ChildHope	SCIAF
Children of the Mekong	Scottish FairTrade Forum
Christian Aid	Self Help Africa
Concern Worldwide	Signal
Deaf Child Worldwide	Solas Trust
Dhaka Ahsania Mission UK	Target Tuberculosis
EMMS International	Teach a Man to Fish
Excellent Development	The Rights Practice
Gaia Education	Theatre for a Change
Gen International	Tools for Self Reliance
HealthProm	TraidCraft Exchange
HelpAge International UK	Transform Africa
Malaria Consortium	Trócaire Northern Ireland
Minority Rights Group International	VSO
People in Aid	Womankind Worldwide
Phase Worldwide	World Vision UK
PhotoVoice	WWF UK
Plan International UK	