

# **CORE - The Corporate Responsibility Coalition**

*Strategic review of its impact,  
effectiveness and performance*

October 2015

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## KEY FINDINGS

### *Benefits for civil society*

1. Civil society stakeholders appreciate the way **CORE brings information, balance and rigour into discussions** and co-ordinates groups with diverse interests, viewpoints and activities. By so doing it has enabled the sector to have a response which is *“more than the sum of its parts”* and allowed the sector to come up with *“clear and actionable asks”*. Members feel that CORE is muscular, packs a punch well above its weight, and represents them well at governmental and policy level.

2. There were a **range of benefits coalition members reported** deriving from their association with CORE, notably:

- Their voice is amplified by being able to draw on the expertise of CORE as well as its networks to push out messages. Larger, more engaged NGOs report this as well as smaller NGOs. *“Compared to some organisations we are well resourced, but the challenges of making progress on these issues are huge and you need multiple voices and people with different political contacts on the political spectrum.”*
- Bringing different perspectives, specialisms and skills together means that approaches and submissions are rounded and well-informed and greater than any one single contribution could be. *“The advantage of [a submission] coming from CORE is that it reflects a broad spectrum of issues.”*
- NGOs feel that CORE enables them to ‘sing from the same songsheet’ and ensures sometimes scant resources are brought to bear in the most effective way possible.
- CORE’s information work (through seminars, meetings and briefings) is well targeted, appreciated and attended.
- The provision of pooled resources (such as a lobbyist) to take forward certain policy areas is felt to be particularly useful
- Members feel that CORE enables them to keep a watching brief, learn new things, and refine and shape approaches by engaging with others. Even the largest NGOs do not have the resources to scan and respond to all issues, and CORE’s work therefore fulfils both a horizon-scanning function and a resourcing function for those areas where they are unable to engage without the input of others.
- Small NGOs in particular are reliant on CORE to help them take forward their corporate accountability work and feel that without this input they would be unable to participate and be involved in corporate accountability work.

3. Overall, CORE enables **both large and small organisations** to **participate more effectively** in the corporate accountability arena and several NGOs confirmed that CORE is central to their internal organisational strategy in taking forward work in this area.

### *Benefits for policy makers*

4. Policy makers report CORE’s reputation as being extremely good and are impressed with the quality and thoroughness of CORE’s submissions. *“CORE has issued comment papers ... which have been so logical and well argued, well set out, that they are basically pretty unanswerable. They have struck just the right tone, the content of them is excellent.”*

5. CORE enables a co-ordination of efforts and this is greatly welcomed by policy makers as a way of ensuring that NGO input is targeted in the most effective way possible. *“Co-ordinating efforts is a sensible strategy and is incredibly useful for us.”* In some cases policy-makers stated that without the ‘funneling’ of NGO views through CORE, access to decision-makers would have been limited. *“None of the organisations ... would have got to meet the minister alone, but because it was CORE they came as part of a team and so CORE had that access which wouldn’t have been secured otherwise.”*

### *Benefits for the policy and regulatory context on corporate accountability*

6. CORE's work has helped shape the policy context for corporate accountability work. Both NGOs and policy-makers noted that there have been gains in relation to the Company Law Amendment; Business and Human Rights Action Plan, Non-financial reporting directive and the Modern Slavery Bill which would not have happened without sustained and detailed influencing and co-ordinating work from CORE.

7. CORE provides a focus and 'institutional memory' for the NGO sector, and a repository for learning and expertise which can outlast changes of priority and personnel within individual NGOs engaged on this issue. This is helpful both for the field in the UK, and for the wider contribution the UK makes to the European and international debate.

### *Learning about CORE's positioning and operations arising from the review*

8. The strategic review also looked at issues relating to CORE's positioning, reputation, structure, governance and membership. The key conclusions have been taken to a strategic review meeting attended by board and staff, and were broadly that:

- CORE has a good reputation though within a limited 'inner circle' of organisations.
- There has been a tangible gear change and increase in professionalism in CORE's operations over the last few years
- CORE's purpose, in particular in relation to its 'membership' could be better articulated
- CORE's current governance arrangements are strong given the expertise and commitment of those engaged, but could be improved by a few measures including more transparency, limits on board tenure and the appointment of a Chair and Treasurer
- Overall, whilst the engagement and involvement of key partners to take forward the corporate accountability agenda lies at the heart of CORE's mission, it is felt that the concept of 'membership' is not a helpful one for a range of reasons. Redefining this role as that of 'coalition partner', being more transparent about those contributing to costs (and that these are not fees) and more streamlined about consultative mechanisms were all suggested as ways forward.
- CORE's single member of staff (co-ordinator) is recognised as a great asset but also represents a risk given they are responsible for the learning and reputation of CORE. Extending the staff team to at least two was suggested by both NGOs and policy makers.
- The name is felt to be confusing and inaccurate and CORE should consider changing this

### *Future priorities for CORE*

9. The context for CORE's work was felt to be extremely challenging given the change of government and the long haul nature of the engagement. That said, it is also clear that the need to make the case for increased corporate accountability grows daily.

10. NGOs feel in the face of this, there is more of a need than ever for CORE to learn from and co-ordinate efforts with partners in the UK, Europe and internationally. Current coalition members wish, broadly, to see it fulfil a more robust leadership and co-ordination role which activates the specialisms of members and creates a forward-looking strategy both to influence where possible events now, but also plan for influencing in the future.

11. Key priorities mentioned were to look at 'follow through' in relation to existing wins (for example, on the Modern Day Slavery Act), to pursue work on the Business and Human Rights Action Plan and to focus in particular on Access to Remedy as an important but neglected pillar for corporate accountability. There was also strong support for pursuing and co-ordinating efforts around the redefinition of 'corporate purpose'.

## 1. INTRODUCTION

CORE (The Corporate Responsibility Coalition) provides policy and advocacy co-ordination and information for a range of civil society organisations working in loose coalition on corporate accountability issues. It was founded in 2001 in response to the specific opportunity arising from the government's policy review which led to the Companies Act 2006. CORE incorporated as a Company Limited by Guarantee in 2010.

This is CORE's first strategic review. It has sought views from a wide range of stakeholders in order to get a sounding on the following areas:

- Impact and benefits of its work, focusing particularly on the last three years. (Section 2)
- Its position and purpose (Section 3)
- Current structure, including governance, management and membership issues (Section 4)
- Organisational strengths, challenges and risks (Section 5)
- Future challenges, both external and internal (Section 6)
- Suggestions for future work (Section 7)

The primary purpose of the review is to enable staff, board and the wider membership to understand the current 'state of play' for the organisation and enable internal discussions about how CORE could and should develop over the next five years. This report provides a starting point for discussions and does not propose definite solutions, as these will emerge from future discussion based on the findings herein.

The review was conducted by Ceri Hutton, an independent consultant with 30 years' experience in the social justice sector. A brief methodology is provided at Appendix A, as is a full list of interviewees.

## 2. IMPACT AND BENEFIT OF CORE'S WORK

This section summarises the range of benefits of CORE's work as reported by interviewees.

### *Enabling a robust and coordinated approach to an issue*

It was generally felt that CORE is an excellent example of a coalition approach which enables civil society organisations to come up with a clear and actionable 'ask'. Several informants noted other coalitions which proved the success of this approach (in the UK and further afield). *"These platforms are necessary to co-ordinate the voice of social society. If you have an established body or coalition such as CORE it's much easier to do this rather than do it on an ad hoc basis."* (European NGO)

Member organisations as well as other external stakeholders were clear that they appreciate the rigour CORE has injected into work which otherwise they felt would have been unfocused. The process of discussion amongst members allows policy issues and positions to be fine-tuned and, through debate, improved.

*"It provides good knowledge and background and gives us the confidence that what we are lobbying on is rigorous. It is hard to do that where nobody is responsible for putting pen to paper or responsible for getting the strategies done"* (Member NGO)

*"I think where they have been really effective has been around consolidating a whole load of views and comments and perspectives into an authoritative voice. In doing that, they strengthen all of*

*their members as well. I would say focus on that bringing together – collating, synthesising into a really well argued ‘this is the position of civil society’ response.” (Government representative)*

*“I suspect that the NGO sector as a whole has engaged more effectively with government on issues of corporate accountability than it would have done. I’ve certainly found it of benefit” (Partner of CORE)*

### *Creating an NGO response that is bigger than the sum of its parts*

CORE has enabled a more robust civil society response in various ways.

#### *Amplifying work of individual NGOs*

Even the larger NGOs report that they felt that CORE enables them to better focus and amplify their work, and that this helps add up to more than they could have done separately.

*“Working on Access to Remedy issues has helped set an agenda and allow the members of CORE to add up to more than the sum of its parts.” (Member)*

*“We may submit our own stuff independently but we often then work with CORE as well - adding strength and amplifying some of the pushes. If you do it on a single basis you might get through but if you are dealing with many of these issues you need a systems approach to it. CORE gives that opportunity – and provides the framework where we can talk to NGOs with similar but parallel aligned interests.” (Member)*

*“Compared to some organisations we are well resourced, but the challenges of making progress on these issues are huge and you need multiple voices and people with different political contacts on the political spectrum.” (Member)*

*“Having a full time secretariat in Marilyn allows a lot of that liaising with government and doing a lot of the legwork. My experience of various coalitions is that unless you have that - somebody who has the remit just to do that and get the documents – it isn’t effective.” (Member)*

#### *Pooling different perspectives and specialisms*

The issue of corporate accountability is multi-faceted, and having a coalition of different organisations with different specialisms enables a more rounded response to the development of policy and more informed reaction to policy change. *“As a coalition, we can bring together case studies of our different interests to illustrate our point – environmental, human rights and so on. That’s what we did on EU non-financial reporting. A lot of the legislation tends to be based on risk to the company, so bringing specific case studies from our work with affected communities provides a much more rounded approach. CORE gives a platform for a range of us to come in and show what is wrong with a proposal”*

Those working on policy at governmental level appreciate this. *“The advantage of [a submission] coming from CORE is that it reflects a broad spectrum of issues. If you take Amnesty, Traidcraft, Oxfam – they have a particular focus or angle. But the CORE briefings blend together those different interests. None of the other NGOs look across the piece. CORE is therefore a really good interlocutor as it can aggregate all of its members’ view and give a more rounded contribution.”*

Member organisations also appreciate having policy areas illuminated by other perspectives. *“When we did the LASPO stuff it was fantastic having the Oxfam case studies alongside the Amnesty case studies. Ultimately we failed but we had strong, compelling arguments. We made it as uncomfortable as we could. It felt good to gather together what is fantastic work, some of which I didn’t know about – and it is good to gather that together round an issue and see it in one place.”*

### *The need to ensure organisations are singing from the same song-sheet*

Co-ordinating the work also has the advantage of ensuring that organisations pull in the same direction. One member described the work as ‘conducting an orchestra’. *“When we have worked together, there were a small core of people who were pretty active and then we often brought in others for certain key moments like sending letters and media things.”* Another quote from a member summed this up:

*“I see CORE as being greater than the sum of its parts. For instance, pushing the government to produce a Business and Human Rights plan in 2011 and then producing guidance and taking on three - test countries, including Colombia where we do a lot of our work. They were happy to lead on that and gained cross-party support for what seems to have been one of their bigger successes. I see CORE as being instrumental in that”*

### *Packing a greater punch by combining brands and reputations*

Several well-known NGOs are members of CORE, each with their own particular brand, reputation and following. When CORE has brought these together to undertake joint work it has meant that what it says has traction with a far wider audience than any one single organisation could alone have achieved. *“Where you have a number of organisations with strong brands and reputations and when you call for something it adds authority to the call”*

One member noted that CORE had helped pitch the NGO voice into corporate debates. *“Around non-financial reporting, for instance, CORE was approached as a community rather than as individual members to get their views and see where the opportunities were. That’s where I really saw the strength of CORE as a counter- balance. The NGO community is vital in the debates – you have to pitch that view into the more pragmatic view advanced by corporate-influenced coalitions. CORE has some power to bring that joint NGO and civil society challenge into those processes”*

### *‘Adding value’ to NGOs both large and small*

CORE enables both large and small organisations to participate more effectively in the corporate accountability arena. For larger organisations already working on the issue it offers the opportunity of getting to know about topics they may not have as priorities, and to amplify their work in areas where they are already working. For smaller organisations with few resources, it enables them to add their voice to an issue which they may feel is extremely important but which on their own they would not be able to engage with at any meaningful level.

One of the ways CORE enables such work is by providing resources which all its members have access to, as for instance when they hired a lobbyist to work on the Modern Slavery Bill. Widely regarded as extremely effective, this allowed both large and small members of the coalition to have access to expertise and specialism which alone they would not have had.

For some member organisations their participation in CORE is viewed as a key way to ‘discharge’ their work on a topic which they are committed to but which they could only focus on to a small extent without CORE’s help. An external stakeholder with a detailed overview of the field noted this: *“There are very few of the major NGOs which have any major focus or staffing in the area of corporate accountability. And some don’t have any at all. So CORE enables them to stay on top of the information and remain within the limits of their skills base. I’m convinced that many of them wouldn’t have understood things like the Modern Slavery Bill without CORE’s input.”*

Members confirm that CORE is a key strand of their strategy for taking such work forward:



*“There are only so many issues I can engage in, and there are so many issues on corporate transparency and accountability. We work a lot on tax, but there are a whole lot of other areas where we don’t have much knowledge. So given that CORE has spent a lot of time knowing who is who and the right relationships to have, that is pretty useful for me.”*

*“We would see CORE as an important contributing factor to achieving our longer term goals in terms of advocacy in this area.”*

*“Having a mechanism to allow affiliation and input from orgs which don’t have specialist capacity is good. It’s a bit like outsourcing some of their policy work to a small secretariat - members are prepared to put in financial contribution because the work is not absolutely core to the central mission of that organisation and not the most sexy thing to fundraise for.”*

Some members recognise that they would not have done work in some areas unless supported by CORE:

*“I don’t have the time to find out about what Amnesty is doing on X or about those topics where we are not specialised. So CORE provides a kind of a service – you go to them if you have a concern about a corporate responsibility issue and they’ll know who is working on it and can convene people. They have good reach across the NGO sector and know who the relevant politicians are.”*

*“Where individual NGOs have limited resources, there has been a multiplier effect which wouldn’t have happened if NGOs were working on their own. I’d say that was true for instance on Modern Slavery – some would always have worked on it, but others would not but saw via CORE the opportunity of doing so”*

*“CORE was at the forefront of lobbying against the LASPO proposals. I think we were quite involved in a series of very active lobby meetings for about six months. I cite that as an example where I found the existence of CORE and its convening role extremely useful – it’s the type of thing where something comes along but it is quite technical, it required pulling together quite a broad range of organisations and individuals to speak out on the issues. In that case I can’t imagine that we would have got involved unless we had had engagement with CORE.”*

### *Increasing the knowledge and profile of smaller members*

The smaller sized members of CORE particularly appreciated a chance to get involved and find out about what others were doing, and also had found it helpful to be included in meetings and seminars (including party political conference meetings).

*“It has been really useful for us. To have Marilyn as a resource on her own is fantastic – she is so knowledgeable and that’s incredibly helpful. We’ve been able to add our logo to briefings and consultations – so as a way of raising our brand it has been helpful”*

### *Enabling policy makers to engage with civil society*

A wide range of informants felt that CORE has been particularly effective at engaging with civil servants and policy makers. Part of its success has been the stance taken by the co-ordinator which has been detailed, tough but also sufficiently ‘listening’ to make policy makers feel that they are dealing with a serious organisation.

*“The previous co-ordinator did a very good job of generating interest in early drafts of the UN guiding principles which created the space for movement on business and human rights in the UK. And since then Marilyn has built up an excellent reputation for high calibre inputs to our FCO and to BIS and is on the invite list to various meetings. That’s the role that we want her to have in*

*relation to government – we want government to go to her and ask for inputs. And for her to be able to say the tough things that they don't want to hear like "we still have problems with victims harmed and left high and dry". She is good at saying that, but she is also good at listening quite hard to what the civil servants are telling us so that she can think about how we best present our arguments to have some chance of success. Being the 'go to' person and being recognised as having links into civil society is not an insignificant achievement."* (Member)

Co-ordinating NGO input to policy makers was recognised by several members as being an important strategy for success in order not to swamp policy makers. *"The government doesn't like to be lobbied by a million people on one issue, so helping some of that channelling into government is really useful"*

This was confirmed by officials within government. *"Co-ordinating efforts is a sensible strategy and is incredibly useful for us. For example, when there is a request to meet our Minister it would be physically impossible to meet 20 different representatives, so she would probably turn them all down. Whereas if you get a request from Marilyn saying 'Can I bring these people and I represent this constituency?' I will generally recommend that the answer should be 'yes' as we know we are meeting the key organisations from civil society."*

CORE has also impressed with the quality of its submissions. The same government official noted that: *"I'd say in my particular field, CORE has issued comment papers or reactions to the main government publication – Business and Human Rights Action Plan - which have been so logical and well argued, well set out, that they are basically pretty unanswerable. They have struck just the right tone, the content of them is excellent. So they have had an influence and a 'holding to account' role that has been more effective than anybody else."*

There was some concern from elsewhere in government that some approaches had been counter-productively demanding. *"We have a limited amount of resources to deal with things – the team of people dealing with that specific proposal was two people only – but [a range of charities] used to send campaign letters to the minister requiring us to respond and so on. Postcard campaigns. FOI requests. So whilst I understand that they have a job they also need to understand there are only so many hours in the day."* However the same person acknowledged that: *"I did find the CORE members more professional than other organisations I have been dealing with in terms of being more prepared on the actual issues."*

### *Creating systems and structures for policy and parliamentary interface*

CORE thus provides a 'funnel' through which the views of a wide variety of agencies can be channelled, and without which the NGO voice may not reach the ears of government at all, as one government informant noted. *"CORE had two meetings with the previous minister and I would say none of the organisations apart from CORE around the table would have got to meet the minister alone, but because it was CORE they came as part of a team and so CORE had that access which wouldn't have been secured otherwise."*

CORE has also helped establish some of the key mechanisms for co-ordinating activity on corporate accountability at parliamentary level, both in the UK and Europe. It was instrumental in helping to set up the All Party Parliamentary Group (APPG). In addition, it has helped establish the European Coalition for Corporate Justice. *"I think they were one of the founding members and they helped to set it up. The existence of the ECCJ is a reaction to the lack of progress at the European level in corporate responsibility and accountability issues. Since the CORE coalition existed, it provided a sort of model for this coalition."*

### *Alerting, informing and connecting members*

Most coalition members were very appreciative of the various informational roles played by CORE, which included:

- Alerting them to new developments coming up
- Connecting them up so they can learn from each others' specialisms
- Providing specialist briefings to develop their knowledge and thinking in relation to key topics.

One indication of this appreciation is the fact that members are obviously keen to attend meetings. A strategy event before the election had 25 organisations attending at short notice, and an event following the election attracted 12 organisations.

In addition, organisations that CORE has worked with on events have had very positive experiences. Events are regarded as both well organized and useful learning opportunities as this quote from a contributor shows: *"The highlight of their helpful engagement was that after we drafted the report, they together with the ECCJ put together an excellent programme around a variety of different locations where we talked with NGOs, many of whom hadn't really understood the issue of Business and Human Rights – environmental groups, trade unions and so on. It was a fabulous way of understanding their questions in a constructive way."* Other informants who had organised events similarly reported them as very constructive and useful.

A wide range of members testified to the usefulness of networking and intelligence-gathering which CORE provides them:

*"They are very good at keeping people informed and circulating things."*

*"CORE shared information on the National Action Plan we wouldn't have got otherwise and helped us co-ordinate in terms of input to the government."*

*"Just being able to ask Marilyn questions is useful – I know it sounds basic, but there's not that expertise [outside London] on Corporate Accountability.<sup>1</sup>"*

*"It enables us to keep a watching brief. You do tend to get swamped with immediate priorities – haven't been to a CORE meeting for a while and meanwhile legislation has been passed in Europe and we haven't had a meeting on the UK implementation. That's starting to rear its head so we are in the process of reactivating our relationship with CORE."*

*"I learn new things – because it brings in the human rights angle it helps me to triangulate. I am often bringing financial expertise into conservation – but what CORE does is that it gives us an insight and access to NGOs we might not necessarily sit down with and discuss issues with."*

*"It is an important clearing house for ideas."*

*"I find it a useful forum for sharing intelligence – who are the key MPs, what are they thinking - and developing better policy ideas. Inevitably the process of drafting a response, getting feedback on it, and having a well thought through input from a number of organisations is better all round. It is better for the policy makers and for us. CORE effectively improves things."*

*"In general they are always on the lookout for new topics where they can bring people together which is very helpful."*

## Influencing policy

Inevitably with policy change in this complex area, where multiple actors are at any one time exerting pressure and influence on policy makers, it is impossible to attribute policy change specifically to

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<sup>1</sup> Comment by CORE member working outside London

CORE's input. However, several people noted that CORE had contributed to a number of significant policy gains.

### *Company Law Amendment*

CORE contacted a Minister at the start of the Coalition government to press for a review of the reporting requirements in the 2006 Companies Act, as a result of which an amendment was introduced in 2013 which requires quoted companies to produce a Strategic Report, including a requirement to report specifically on their human rights performance.

### *Business and Human Rights Action Plan*

Following the launch of the Ruggie Guiding Principles, CORE was proactive in 'seizing the moment' and leading on the UK's response to these. As a result of this the Business and Human Rights Action plan was drawn up and subsequently shaped with CORE and its members working closely with BIS, and with the recently established APPG also exerting pressure to produce this. As a result, the UK government is the first state to have developed an Action Plan on Business and Human Rights, a particularly remarkable achievement given that at the time it was a Conservative-led government (albeit in coalition).

### *LASPO*

Though CORE did strenuous lobbying on LASPO, this did not lead to any major policy changes. Interestingly, several of the members who were involved in this lobbying work reported it nevertheless as a useful and informative process for them. One informant felt that the main problem with CORE's intervention was that the lobbying began too late in the day, once *"the die had been cast"*.

### *Non-financial reporting directive*

The EU's Directive on non-financial reporting came into force in 2014, and now has to be transposed into law by member states. CORE and key member organisations were active in seeking to prevent the UK government diluting the provisions it contained. It was felt that this was a particularly technical piece of policy work in which CORE's convening role harnessed the time and resources that a number of member organisations dedicated to this issue. People working with CORE on that initiative agreed that CORE played a vital co-ordinating role: *"It was quite policy wonk stuff which was precisely why it was useful to have CORE."*

### *Modern Slavery Bill*

CORE's work on the Modern Slavery Bill was described by one member as *"brilliant and slightly coincidental"*. It was generally agreed that CORE's input here has been vital to securing the acceptance of amendments to the Bill to address corporate transparency in supply chains (the 'TISC' clause). There was nothing on this in the Bill when it was originally published, prompting CORE to liaise with anti-slavery organisations that were focusing on the Bill and to convene a number of organisations to work on it together. The end result was success in bringing about this provision. All informants felt that the appointment of a parliamentary consultant to work on behalf of the coalition had been a game changer, and CORE's role in holding together somewhat disparate groups and voices had been handled well and sensitively.

## *Helping to shape European and international debates*

CORE has been involved in initiatives, meetings and research which have shaped debates in Europe. The publication of 'The Third Pillar' has been used as a key resource for the work of the Council of Europe according to one respondent, and *"they are now developing recommendations for the implementation of the UN Guiding Principles by European states. They are taking the UN Guiding Principles, putting them in the European context and saying 'this is what you should do'."*

A government informant observed that such collaborative research exercises were a good use of CORE's resources by contributing their knowledge and specialism to broader initiatives. *"This is a way CORE can lever its expertise to a far wider audience"*

### *Developing strategic and policy responses*

As well as responding to policy opportunities which come up, CORE has sought to work proactively to get critical issues aired and addressed strategically by commissioning research, running workshops and undertaking other influencing activities.

CORE's work on Access to Remedy (the 'Third Pillar' of Ruggie's framework) was the main example given of this. CORE has been involved in collaborative work with its US and European counterparts in commissioning research looking at Access to Judicial Remedy<sup>2</sup>, with a dissemination strategy that involved bringing together activists, lawyers, academics, trade unionists and others to think through the issues. CORE also commissioned research and analysis on non-judicial remedial mechanisms, working with universities in Australia and the UK.

Such research adds evidence and strategic thinking to the UK NGO sector and enables informed discussions with policy makers who may be circling the issue but currently not engaged. It is thought that such work has helped to engage the UK government: *"We have helped to push Access to Remedy up the agenda. We had a big meeting in March at the Foreign and Commonwealth Office [the launch of the business and human rights action plan revision process] where it was clearly communicated that the government hadn't done enough."*

For some, this activity 'ahead of the curve' is the most important work CORE can do. *"Where CORE has been most useful is when it has been one step ahead of pushing the boundaries and leading civil society organisations into new ways of thinking about strategic themes and getting one step ahead on policy understanding."* Several members commented that they felt that this area needed to be developed, and CORE needed to build influence in order to have a wider 'proactive agenda'. There were strong messages from members as well as allies and partners in the field who felt that CORE could play a greater leadership role in the future:

*"I have some criticism that it operates well at a level of information sharing but doesn't move onto strategy. They produced the manifesto which has four or five policy areas which people can agree on at a top level, but there's no real plan on how members can work together to achieve that. It remains at information sharing level, not at the level of doing joint work."* (Member)

*"I think a key role should be to serve as a platform for strategic discussion, so not just co-ordinating the discussions on strategic issues, but really leading the discussion on the strategic direction for civil society and the corporate accountability movement. Usually the work of NGOs in this space is dictated by policy opportunities but we also need to have a debate about where we might be able to create opportunity – otherwise we are always chasing the game rather than setting the rules. The existence of CORE could make that much more effective."* (partner agency)

### *Hooks UK NGOs into the global corporate accountability movement*

Having a co-ordinating body was regarded by several informants as key for a movement of civil society organisations to keep up to date with developments globally and attempt to bring principles and standards at international level into practical and useful application. One informant described the UN Guiding Principles as *"a penny in the process of dropping – we can influence them whilst it is still in*

<sup>2</sup> <http://icar.ngo/wp-content/uploads/2013/02/The-Third-Pillar-Access-to-Judicial-Remedies-for-Human-Rights-Violation-by-Transnational-Business.pdf>

*the air spinning, but once it has hit the ground and been framed, that's the end of the game".* For them, international collaboration is key to ensuring a unified, informed and powerful voice:

*"CORE is uniquely placed to build and maintain connection and collaboration with similar initiatives in the US, Europe, and obviously in the Global South as well. This kind of a global co-ordination process is in my experience very important. It helps so much if there is an organisation at a national level. The debate on corporate responsibility is a global one, and it has become even more unified and globalised. Developments at the UN level have put certain issues on the table. And it is really important that civil society organisations from around the world are able to develop a common position on certain issues."*

The European Coalition for Corporate Justice<sup>3</sup> does some of this work (CORE is a member) but having a national co-ordinating body was felt as crucial in engaging the small as well as large in-country NGOs, with their range of perspectives, into the debate. Such coalitions exist in other countries in Europe, such as Finnwatch in Finland<sup>4</sup> and the 92 Group Forum for Sustainable Development in Denmark<sup>5</sup>.

### *Providing an institutional memory for the field*

A final benefit mentioned of CORE was that it helps to provide continuity in a rapidly-changing field. Organisations change priorities, people come and go, but if there is a stable repository of research, policy and co-ordinated work then this helps to ensure that the civil society voice is able to keep up with such changes.

One member organisation called this the 'sector memory function' and felt that CORE provided a vital role in ensuring that anybody working in the field was able to get 'up to speed' quickly with current thinking as well as with key players (albeit in coalition) in the field. *"I think that kind of co-ordination role is really important and it's motivational as well. Otherwise you would be in a situation where two years down the line you come back to an issue and don't know who is dealing with the issue in X or Y NGO. You'd then struggle to find out who to connect with. Whereas at present, you can roll up to a CORE meeting and meet the new people working on it in the other NGOs and build the relationships."* Other members described their organisations as having had shifting priorities over the years and having benefited from being kept up to date by the common touchstone CORE provides.

*"The really great thing about CORE is that it is a brilliant link with organisations that I am not personally in touch with. So having that good relationship with CORE is key to quickly get things done as a coalition. So for example, the people involved in and representing other organisations change constantly – but because there's a central point co-ordinating, those changes are much easier to manage."*

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<sup>3</sup> <http://www.corporatejustice.org>

<sup>4</sup> [www.finnwatch.org](http://www.finnwatch.org)

<sup>5</sup> <http://www.92grp.dk/>

### 3. CORE PURPOSE AND POSITIONING

The strategic review explored current perceptions of CORE in relation to its purpose, stakeholders and current reputation. This section summarises those responses.

#### *What is CORE's purpose?*

For those members who are clear about what they think CORE's purpose is, responses fell into broadly two categories:

1. Those defining CORE's purpose by outcome: that is, by the ultimate impact they wanted to see CORE achieve.
2. Those defining CORE's purpose by function: that is, by the role it played in relation to the activities of its members and the wider civil society sector.

These are not, of course, mutually exclusive but the emphasis was different in some informants' minds. For those seeing CORE's purpose as primarily 'outcome-driven', the effectiveness of CORE would be judged, from what they said, by the degree to which corporate accountability in the UK was improved over time:

*"In a sentence [CORE's purpose] is to improve Corporate Accountability in the UK. It raises the issues and points out that there's a problem and tries to press for some action."*

*"CORE's purpose is to look at the regulatory environment relating to companies impacts, particularly on human and social rights issues. And then provide almost a rapid response unit for its members in terms of looking at this specialist area."*

*"CORE's purpose is to improve the decision making of corporations particularly in the field of human rights and the environment."*

Whereas for those seeing CORE's purpose as more functional, the purpose was more to ensure that activity amongst civil society was co-ordinated and enhanced by CORE's co-ordinating work. This was a purpose summed up by one member as being 'almost like a service to NGOs'. Several people described it as a 'key part of the infrastructure' and others noted that:

*"I understand [CORE's purpose] to be maximising the influence of its members in those areas where a single common voice is going to be more effective than lots of individual submissions."*

*"To me, CORE is a kind of specialist channel which can articulate civil society views and voice into those kinds of policy processes across a range of corporate accountability issues. That's the key bit for me."*

*"I see them as empowering and bringing the work of their NGOs that form the coalition to the next level on corporate accountability, as most of them don't have the time or the capacity to do that on their own."*

*"CORE is definitely about navigating parliament for NGOs"*

Some were not clear what the purpose was, though said over time they had got clearer by watching CORE in action. This was also a common theme – CORE's work is somewhat 'niche' and known by only a few people on the inside of the corporate accountability world.

*"Well, you ask me what the mandate of CORE is and I am not entirely sure, to be honest."*

*"It took me a little while to work out what CORE did – that took a while."*

*"I don't really know what CORE's purpose is actually. I guess I think they have a UK focus, and are probably about holding UK companies to account for what they do off shore? Is that right?"*

### *Who are CORE's main stakeholders?*

Some informants were stumped by the question of 'Who are CORE's main stakeholders?' and felt they could not give a satisfactory answer. For those who did have a view, responses were again divided into two camps: those who felt that CORE's main stakeholders were those adversely affected by the UK company behaviour, and those who felt CORE's main stakeholders are the member organisations and partners with whom CORE currently works. Two quotes illustrate these two points of view:

*"CORE is for persons or communities adversely affected by corporate activity and whose interests may not be directly aligned with the financial interests of the corporation."*

*"Essentially it is there for its NGOs and all of the stakeholders and those people on whose behalf those organisations are working."*

Again, this was not a sharp divide and people understood that the victims of corporate behaviour are at one remove, and that the work done was to enable changes 'down the line'. The point is mainly interesting in terms of CORE's relationship with its membership and how much they determine its agenda, and how CORE decides to measure its activity into the future.

### *What is CORE's positioning and reputation?*

CORE is a very well regarded specialist organisation and valued highly by its members. That said, most people felt that it is little known outside a small inner circle of people working on corporate accountability issues. Opinions slightly varied on whether or not this matters:

*"It is regarded very highly. Its interventions and submissions are detailed and very well argued. But I don't think it has got a high profile beyond those with which it engages. I think a lot of people should and could know more about what it can offer."*

*"It's very well regarded by government departments and by NGOs. And those are the only two that matter."*

Several people commented on how its position and reputation has grown over the years. *"What is good about CORE is that it no longer carries so much of the baggage from the past and it is regarded well for what it has been doing over the last few years."* This reputation has been built on quality work which has been detailed, precise and fair. *"What's really good about CORE is that it has really built up its reputation as a good place to go to for thinking and a balanced approach to corporate accountability."* It was also noted that CORE is now on many national and international lists which mean it is invited to the table of key networks and groups.

At European level, CORE is also highly regarded. *"The reputation of the CORE coalition is very good. They are regarded as the most professional and perhaps effective of the NGO coalitions working on these issues nationally. I think in part that is due to the UK brand - Europeans are a bit biased towards UK people in general. But also the co-ordinator and others in the coalition all come across as very professional and serious people and that has certainly helped the CORE brand."*

It has a strong reputation with some government departments who see it as *"very well viewed, with a good capacity to bring in experts"*. Another informant confirmed this: *"In the meeting I attended with BIS, it was clear that the department saw CORE as a key stakeholder with whom they had to engage"*.



There was some concern that as result of the change of government, the strong relationships built up during the Coalition government may change. However informants felt that CORE's reputational capital would stand it in good stead with both BIS<sup>6</sup> and the FCO<sup>7</sup> into the future. One informant felt that CORE could develop its relationship DFID<sup>8</sup>, and felt that there may have been developments of relevance to CORE's which had not been pursued.

The key strengths mentioned in relation to reputation were that CORE:

- Is 'muscular', packing a punch well above its weight
- Is evidence-based and pays great attention to detail
- Has good relationships with BIS and the FCO

The main weaknesses or risks of its current positioning are that:

- Its reputation is strongly associated with the performance and personality of the individual co-ordinator. This currently stands CORE in very good stead, as the approach adopted is regarded as professional, intelligent, evidence-based and listening. However, several people noted that it is hard to disassociate their view of CORE from the individual in post at any given time, and that so much depends on them that it exposes the organisation to what some felt was considerable risk.
- It is somewhat under the radar for some audiences, including the international development community and the NGO sector beyond the immediate corporate accountability 'inner circle'.
- Some informants did not recognise the name 'CORE' and had to be prompted by specific reference to the co-ordinator and/or the piece of work they engaged on.
- Coalitions and co-ordinating bodies generally find it more difficult to capture the imagination of those coming only briefly into contact with them. As a result, individual member organisations (such as Oxfam or Amnesty) stick in the mind over and above CORE for some of its policy engagement work (for example, on LASPO).

## 4. STRUCTURAL AND GOVERNANCE ISSUES

This section summarises the governance, management and membership issues raised during the review.

As will be seen, there are a number of grey areas which were raised by informants during interview reflected in this section. An over-arching point made by a couple of informants was that they felt that this was an area where there was a certain irony in not getting it right, given CORE's focus on corporate governance and accountability. It may therefore be useful when thinking about these issues to consider the principles CORE promotes in relation to companies (of transparency and accountability, for instance) in order to understand how it needs to develop its own practice.

### *Governance and management issues*

#### *Overview of current governance and management arrangements*

CORE is a company limited by guarantee and does not have charitable status. It incorporated as a company in 2010 and prior to that was coordinated under the umbrella of various supportive member organisations.

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<sup>6</sup> Department for Business, Innovation and Skills

<sup>7</sup> Foreign and Commonwealth Office

<sup>8</sup> Department for International Development

It is governed by a board of directors who currently number five people. Three are from key coalition organisations (Amnesty, CAFOD and Traidcraft). Amnesty and Traidcraft staff members have been Directors since 2010 and played a key role in CORE's inception, CAFOD was a long standing member of the coalition and joined the Board of Directors in 2011.

An open recruitment exercise resulted in two additional individuals being recruited to the board, though both of these subsequently had to move on. The individuals who replaced them were approached for their specific skills. The board meets roughly four times a year.

There is one full time member of staff who was taken on in 2012 - the third person to fill the coordinator role since CORE was founded in 2001. There is also now a part time intern working on communications. The coordinator, whose job title was subsequently changed to that of 'director' to more accurately reflect their responsibility and role, is supervised by one of the board members.

There was generally a lack of awareness amongst the membership as to who is on the board. Typical comments were:

*"I have a positive view of CORE so I'm sure the board are doing a good job"*

*"I'm not right up to date with who is on the board. I think some of them have been there forever"*

That said, this was not an issue for the membership in the main, though talking through some of the governance issues prompted some to think more closely about what they might want to see change. Some also had a confusion about whether being a board member involved being one of the paying members of CORE - a couple of people thought that it probably did, but were not sure. Overall people had a vague sense of the board 'doing things well', and some remembered that there had been an open recruitment to the board which they had discussed with colleagues, but other than that there was a 'hands off' feel to how the board was run. This is not necessarily a bad thing – indeed one member organisation noted that they hoped the board allowed the coordinator to 'get on with the job' without undue interference: *"I've no idea at all about the board but if I were a board member I would step back and let the staff at CORE lead."*

### *Strengths of the current arrangements*

- The board is felt to be extremely expert and to include some of the leading and most experienced figures in the field
- Having longstanding members has value as they have been through CORE's journey and understand the nuances of its work
- The board knows and works well with each other
- Good support is provided to the coordinator by current supervisory arrangements

### *Concerns and suggestions*

#### **i) Longevity of membership.**

Whilst this has advantages in terms of continuity and expertise, there was a sense that the current arrangements could *"go on forever"* (as one informant put it) unless there is an impetus to refreshing the current board membership. There are strong forces to keep things as there are, not least that a (resource intensive) process of open recruitment was tried and only came up with short-lived and patchy results in terms of yielding new and committed board members (the two non-organisational members currently on the board were co-opted following this process).

#### **ii) Maximum tenure**

Given this, though there was some concern that a limitation on board membership should not move people on 'for its own sake', there was nevertheless tentative support for the idea of maximum tenure. In terms of suggestions as to what this should look like, people noted that it took at least one or two years to become a functioning board member, and that people should therefore be thinking in

at least three year cycles, with a six-year cycle being the norm with a possibility of extending this to nine years in the event of a Chair. Maximum tenure also requires succession planning for it to be introduced in order to start lining people up in rotation and not to have a complete change of board at once, which would not be good for the organisation. It should also be noted that it was felt that the three organisational board members would be a loss to the organisation at present, and that this should be planned rather than a sudden change.

### iii) Leadership

Some feel that the board is still operating somewhat as it did when it was a Steering Group. *“To some degree the board haven’t really transitioned from the model of being a Steering Group. The focus was then very much on the detail of policy. And I think for some people that’s still where they are most comfortable.”*

There is no Chair of the board at present, which reinforces this steering group feel, and both board and staff members commented on the fact that there is a certain hesitancy around having strategic conversations and coming up with priorities. Some people wondered whether this was to do with the board’s current relationship to membership and not having a clear sense of its ‘legitimacy’: *“I think we are open to challenge around the make-up of the board at present – people could say ‘why are those organisations there?’ and we don’t have a good answer to that.”* There was also a sense that the current size of the board may play some part in producing hesitancy: people are aware that there is a much wider group ‘out there’ who attend meetings regularly and have much to say, but that within the board itself there are only a few people taking decisions. Perhaps as a result of this, reaching decisions can be, some feel, quite difficult: *“nailing colours to the mast is not the board’s current forte”.*

### iv) Strategising and setting priorities

It was noted that the board has evolved from being closely involved in operational issues to seeking to be more strategic. This is welcomed.

That said, there were mixed feelings about how effective the board has been in doing this. Strategic discussions initiated this year had limited success according to staff and board members involved and some feel that the board is ‘missing a trick’ in terms of getting clearer about what CORE could and should be doing. Priorities are sometimes set in a rather ad hoc way. Most members when asked said that they had no idea how priorities were set in the organisation. A few did not think this mattered – they trusted the co-ordinator and the board members and felt that they would be informed and objective enough to be spotting the major opportunities and priorities the membership needed to know about. However, most members when they thought about it felt that CORE could and should be involving the membership more when it sets priorities, not least because engaging in this process would enable a wider debate and engagement with the agenda which some feel is currently lacking.

This is supported by a view from the staff and some board members that there would be merit in engaging more people in setting advocacy and influencing goals, even if the group of people focussed on the operational and resourcing aspects of CORE remains small. *“At present we have meetings which are attended by upwards of 20 people, and then we have tiny board meetings where technically we are setting priorities. There’s a strategy gap there”.* One suggestion was that there could be a wider advisory group or council of members who sign up to feed into and discuss policy, and then a smaller executive which oversees the operational and performance aspects of CORE’s work such as fundraising, communications, human resources and finance.

The advantages of consulting on advocacy and influencing objectives were noted as:

- It would ensure that there was a wider pool of expertise and knowledge to draw on
- It would make members more engaged
- It would increase a sense of ownership of CORE
- It would make CORE more accountable

- It would help members to understand better how they can get involved and contribute

It was however also recognised that setting goals in this way can run up against challenges, not least that organisational priorities and agendas differ. However, the strong message from members was that they would like to see more consultation and input, but that this should not be onerous or 'over-engineered': most acknowledged that they were busy, that they were grateful to the board for taking on the role that they had not stepped up to do, and that as a result what they wanted to see was CORE facilitating a light-touch consultation on priorities or suggestions perhaps through special interest or working groups. Typical comments were:

*"I do think it is a good idea for members to have an active participation where possible – it makes the organisation more accountable, and should also strengthen it. In our experience the more you get back the more you engage."*

*"I think the board should be setting the strategic direction but consulting with it on the wider membership. That would allow people to feel more engaged, more likely to support with money, more briefed, more bought into the process, but still give CORE some degree of autonomy"*

*"I do think it needs more structure, but I would avoid putting in an over-engineered governance structure. It is good that you can get some of the small NGOs involved as well and they feel like they can have a voice."*

#### v) Skills and culture of board

There were a few concerns about the current composition of the board to do with a bias towards heavy and detailed policy rather than campaigning work, and some concern that the organisational members were from large and established organisations and may not reflect or think about ways in which smaller organisations could creatively get involved. This was largely about bringing in new perspectives and a bit of challenge to current ways of thinking, which may partly be linked to the longevity issue as well.

#### vi) Conflict of interest

The board was asked whether or not they were there as organisational or individual representatives. The answers amongst organisational members varied. One board member said that they were clearly there as an organisational representative and that the only reason why their organisation could invest the amount of time spent supporting CORE in this way was because it fitted and took forward their organisational agenda. Another board member however said that, though CORE was a priority for their organisation, they felt that it was essential when in board meetings to put the interests of CORE before their own organisation's interests and take a wider view.

Several people mentioned that there had been one or two occasions when they felt that there had been a clash between competing agendas for individual board members i.e. that CORE's interests were perceived potentially to be in competition with those of the member organisation and that as a result, CORE's best interests had not been fully considered.

This is clearly an issue, but one which was mostly felt to be a question of nuance and understanding. Essentially as a board member of a company it is imperative to put the interests of that company above all else when sitting at board meetings, and as with many if not most other organisations CORE has people on the board who have other interests. The waters are slightly muddied by virtue of board members also being members and of investing time beyond that of 'normal' membership contributions, but all the same the primary consideration has to be the thriving and flourishing of CORE as an organisation. As various people pointed out, *"if CORE flourishes, so will ultimately my organisation's agenda in this area."*

It was therefore felt that if such discussions come up in future it may be helpful to be overt about potential conflicts of interests, as is common on other boards. One board member summed it up: *"The skill is to remind people that you need to change your thinking hat and that your primary*

*objective is the long term wellbeing of that entity you are on the board of. You are bringing your skills from your day job to help that organisation. The problem has been that sometimes people have worn their organisational hat and we haven't found a way of challenging what is being said. I think that it needs to be more explicit and you say when you are wearing X or Y hat."*

The other issue raised by a couple of member organisations was about the role and legitimacy of non civil society organisations on the board. One member had a slight concern about having a legal firm on the board. *"We currently have a lawyer on the board and we get I'm sure brilliant advice but we don't want to be seen as the mouthpiece for one single law firm. That's a reputational challenge that we have got."* Another concern was expressed in relation to having had somebody from the Aldersgate Group on the board. *"I was shocked and worried about that. It just felt to me that it was inappropriate to have them on the board of CORE. There are plenty of organisations doing tripartite multi-stakeholder stuff, and that's not CORE's role, I think"*

#### **vii) Staff support and management**

The size of the current staffing was raised as an issue and is set out in the next section on organisational strengths and weaknesses. From a management point of view, the current arrangement whereby the director is supervised and managed by one board member seems to work, but some are still worried that this may not offer sufficient challenge or support or opportunity to progress. *"Apart from the governance role of us as board members we end up being advisers, confidantes and support workers for the role. Do we need more of us playing these roles so that she can have a larger network of people to tap into?"* It was felt it may be worth considering having somebody outside the current board to act as a sounding board.

### **Membership issues**

CORE's purpose is defined by having members (as it is a coalition) and CORE's primary stakeholders were felt to be above all its members.

However, there are several grey areas around the membership. A recent exercise to rationalise membership revealed a number of organisations which had not been active for years. The staff have tried to contact all members to check if they still want to be involved to make this more coherent. This has been partly successful though there are still organisations listed as 'members' from the original work on the Companies Act which are either uncontactable or which have not confirmed membership.

#### **Key issues raised in relation to CORE's membership**

##### **i) Size of membership**

Whilst a wide membership list is a good thing from the point of view of presenting a substantial body of expertise and civil society engagement (and having the 'clout' which comes from that), from a funding point of view it can cause some difficulty as funders wonder why CORE is not fundable from member contributions or question why they should fund CORE when they already fund several of its member organisations.

##### **ii) Membership benefits and expectations**

Most membership organisations have clearly defined expectations both of membership benefits (i.e. what members can expect) and of membership contributions (i.e. what members are required to do in order to release those benefits, which may be either financial or behavioural). CORE has neither of these so members are not clear what the expectations of their engagement is, nor what they can expect to receive.

##### **iii) Range of diverse standpoints amongst the membership**

What unites CORE 'membership' is an interest in a range of corporate accountability issues, but as many pointed out this is a diverse and multi-faceted issue, and so firstly 'members' are interested in

different aspects of it and secondly may not have the same understanding, emphasis or outcome in mind when they engage with the work. Additionally, members vary in their commitment and motivation to engage with the issue, which has implications in terms of what contribution can be reasonably expected to CORE's activities and funding.

Finally, members are on a spectrum with regard to the extent of their commitment to 'campaigning' to influence both governments and corporations. As a result members vary in their willingness to speak out against corporations and criticise their behaviour, particularly given the growing trend to enter into corporate partnerships, not least because this may bring funding opportunities to take forwards some areas of their work.

#### iv) Opacity of fee 'structure'

CORE's membership fees have been collected on a voluntary basis which has resulted in a range of contributions. Smaller organisations or networks may pay nothing (though some do contribute despite limits on their own resources), whilst larger NGOs contribute between £1,000 - £7,500, sometimes making additional contributions for particular projects/activities.

Generally, those members who pay regard what they give as a contribution rather than a membership fee as such. A couple of member organisations expressed some concern that they didn't know now who else was paying into the general coffers, and were worried that they may have ended up being one of the few. *"One of the concerns I have is that I get a sense that a lot of the organisations may not now be as engaged as they were. I'm being asked here about how CORE's funding works but can never get a clear answer. I'm being asked about it internally. For all I know other major NGOs aren't contributing any more"*. This person was reassured when they were told that this was not the case.

So whilst there wasn't a sense that there was a problem having differential payments towards membership, and whilst there is general agreement that payment should not be a bar to 'membership' or involvement, there is a need to be clearer about what is expected and/or needed from whom and why.

#### v) Who counts as a 'member'?

As already noted, membership is organic and difficult to pin down. It has been traditionally limited to civil society organisations, but amongst these are other networks and coalitions (which are in the same position as CORE and unable to contribute) and also some groups where it is clear that the issue of corporate accountability will be, at best, an occasional interest. In addition there are a range of individuals and 'allied organisations' who are not members but who effectively contribute more by virtue of attending seminars and working closely in partnership.

There is a sense of an 'inner circle' of members which already exists, some of whom pay and some of whom do not. Members themselves are not clear about who is a member (as opposed to an ally or supporter): *"For many years I wasn't entirely clear on membership and whether we were members or not. I wasn't very clear on that at all, but it didn't bother me really. I checked it out recently in fact – we are!"*

### Suggestions around membership

#### i) Redefine it as a network

Some informants suggested that CORE should stop defining itself as a membership organisation and should accept the territory which comes with being a coalition or a network. One person described it as "a network which becomes a coalition when there are specific regulatory opportunities, which normally there are".

No one model for future engagement was suggested, but some of the principles of a model which emerged were:

- Some mechanism should be created to allow organisations with limited resources or a tangential interest in corporate accountability to stay involved
- A clearer delineation should be made between organisations which ‘invest’ in CORE’s future (in terms of both funding and contribution to advocacy priorities) and those who are only occasionally involved
- Any membership, affiliation or partner scheme needs to be light touch. There was no appetite from anybody for having onerous administrative systems.
- It would be good to be clearer about what being a member (or affiliate, or partner) of CORE means in terms of key values and (broad) aims.
- The Publish What You Pay coalition<sup>9</sup> was frequently cited as an example of a coalition which functions well, though it was also acknowledged that this coalition has a clearer ‘ask’ than was possible for CORE.

#### ii) More streamlined consultative mechanisms

Several members would be keen to see a series of working groups to which organisations could sign up as being part of the membership (or affiliation) ‘offer’.

#### iii) Future fees or contributions

It may be a good idea, some felt, to call the financial contributions made by members just that rather than fees, and to publish these on the website as part of the income stream for all to see. There could be a category of contribution which is not individually listed (say, for contributions between £50 - £500) and organisations confirming their preparedness to be listed as a network member or affiliate could be invited to contribute a nominal amount.

### *Benefits of involvement*

Member organisations were asked to identify what they would count as the biggest benefits of membership, and this is what they fed back:

- Having open meetings, or meetings on a particular topic, where people can get updated and get views from other perspectives
- Participating in events where CORE plays a ‘thought leadership’ role, as it has around Access to Remedy
- Having a point of contact where members can check out particular developments or concerns which their organisation is engaging with (a kind of consultant at the end of the phone)
- Being invited to participate in wider groupings which otherwise would not be on their radar
- Being given the opportunity to speak at events
- Raising the profile of their organisation
- Gaining access to decision-makers, both politicians and civil servants
- Being alerted to new issues and opportunities for input which may pass them by otherwise
- Having influencing and lobbying work co-ordinated alongside other interested civil society groups to ensure that the combined message and impact are as strong as possible
- Networking with other interested organisations
- Benefitting from the detailed analysis and interpretation CORE undertakes on policy issues

## 5. ORGANISATIONAL STRENGTHS, CHALLENGES & RISKS

This section summarises the key organisational strengths identified by informants during interview. It then identifies the most commonly cited weaknesses or challenges

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<sup>9</sup> <http://www.publishwhatyoupay.org>

## CORE's strengths as an organisation

### Strategic strengths

#### i) Strong reputation as a professional, functioning coalition

As has already been noted, CORE is highly regarded and now commands a high level of respect from key (though limited) audiences. It is known on the European and international circuit, and is known for being a 'policy expert' in the field. It is also felt to function well compared to other networks: *"I am involved in quite a few coalitions. I often cite Publish What You Pay and CORE as two highly functional examples."*

#### ii) Working in a field where there is a high level of interest

There is a lot of interest in corporate accountability generally, and a lot of interest particularly at international level around the kind of technical debates CORE has up to now specialised in. Corporations are increasingly under the spotlight, there are significant moves underway at UN and international level, and various debates around a potential Binding Treaty as well as the concrete realisation that the Ruggie Principles are only just beginning to take root. Interest in this agenda is currently also high amongst some key funders, as one funder noted: *"We are interested in the power of corporations, the harm they can do and how they are held to account. That is more the case now than ever - we have recently strengthened that interest in corporate accountability as being a live issue."*

#### iii) CORE's size makes it highly flexible, responsive and pragmatic

Though there are resource challenges in being such a small organisation, it can also work in its favour. Issues move quickly in the corporate accountability field, and CORE has managed to be nimble in responding to these. This was one argument in favour of making sure that any 'rationalisation' of governance and membership does not introduce a big bureaucracy which could, it was felt, hold CORE back. In addition, the way CORE has evolved the practice of working and consulting with members in particular in regard to public statements is felt to be pragmatic and sensible. CORE currently drafts a letter which individual organisations sign up to it as appropriate, without the need for a long, consultative process.

#### vi) Not a charity

Though there are funding disadvantages to not being registered as a charity, it was noted that given the recent changes to limit political activity by charities, there are also advantages given CORE's work.

#### v) Wide reach and potential influence given its members and allies

Given that the current membership and involvement includes some of the major civil society players, CORE's few resources provide enormous leverage for a co-ordinated approach. As one informant said: *"CORE is a small coalition if you see it as such, but it is also a huge coalition if you look at it from a different perspective. It is all about the attitude you have at the start of the war!"*

#### vi) Attractive 'offer' to members

Over-archingly what CORE offers all of its members, even the most engaged and resourced around this issue, is the capacity to enhance their work and thinking through a small secretariat which then can do work they do not have the means to do or have not prioritised. It both fulfils a watching brief and provides a way of getting work done in a more effective way than employing a person internally. This is attractive to members.

### Operational strengths

#### i) Tangible 'gear change' in last few years

*"CORE has hit its stride in the last few years. They have changed from being an organisation which was slightly known, but not really understood in terms of who they were representing and how professional they were as an organisation. They have moved from that to being seen much more*



*readily as a coalition. That's been an important shift.*" It was felt by several people that CORE has 'upped its game' in terms of its performance in recent years and now comes across as a serious organisation which commands respect.

#### ii) Improved communications work

CORE's communications work has also stepped up a gear. The website has been completely overhauled and was described as 'night and day' compared to the previous one. Communications through social media and in the press has also improved, and interest from member and allied organisations is increasing. Several members bore this out, saying that they had recently begun to take more notice of what CORE was doing, and were feeling more positive about re-engaging.

#### iii) Staff regarded as highly competent, skilled, professional and helpful

The most frequently mentioned strength of CORE was its co-ordinator. Several people noted that the co-ordinator and their performance were inextricably mixed up with how people feel about the organisation generally, and in this case the impression people have is of a highly competent person with "endless enthusiasm" who they can trust. This feedback came from board members, other members, allies in the field and government representatives. Typical comments were:

*"I have been more impressed with Marilyn the more I have got to know her. I wondered at first whether she was the right appointment but she is doing a great job I think. The secretariat is so crucial."*

*"She is new to the field, and it is a severely technical field, but she is clearly on top of the stuff. She has a nice facilitative touch and I also think that because she has not come in as the world's expert on something or other she is really willing to use other people's strengths and to act in a facilitative way whilst keeping track of what the important stuff is. I am very impressed by her."*

*"I think Marilyn does an amazing job – can't believe she is just one person. She does it with a great deal of energy and enthusiasm and also intelligence."*

*"I noticed a big change when Marilyn took over – it became a more muscular and present organisation, and under her tenure CORE has achieved much more of its co-ordinating function."*

## CORE's challenges and risks

### Strategic challenges

#### i) Lack of clear strategic priorities

There is a need to establish a clearer set of priorities, and for CORE's role in monitoring and engaging with issues to be more clearly stated. It was noted that much of CORE's work has been dependent on opportunity, and that this inevitably was 'unplannable', but that it could and should set out areas where it was going to focus attention irrespective of what is happening at the UK policy table, particularly given the current political climate. A decision to focus on access to justice is an example of this.

#### ii) Limited strategic input from members

Linked to this is the slight reluctance of current members to get involved in running CORE, and a failure to consult or engage in a systematic way about the setting of strategic priorities. This means that at present members have a sense of a small group of people driving the agenda. Some acknowledge, however, that this is in part because they do not step up to the plate: one person described the current situation as something of a "leadership stand-off".

#### iii) Uneasy relationship with leadership

There is an uncertainty at the core of the organisation about whether or not it could and should be leading the 'membership' on corporate accountability issues. Some actively want this to happen, others are more agnostic. The comparison was made between CORE and Publish What You Pay, which was regarded as having an agenda it sets and which members then sign up to: conversely, CORE was described as sometimes feeling as if it proceeds at the pace of its members and is a bit nervous of moving into that leadership role. That said, it was also acknowledged that CORE has to show that it can add value to the work of those involved given that all organisations are going through financial squeezes at present.

#### iv) Risks around finance and fundraising

CORE is on a tight budget, and there have been some issues in the past with not having sufficient monetary reserves to tide it through financial squeezes. It has also struggled to get funding beyond its current funders.

Part of this may be linked, some feel, to CORE not being sufficiently 'cutting edge' and not selling itself as well as it could. It may also be linked to a genuine uncertainty about whether it can and should describe itself as setting an agenda in the sector which some funders may find more attractive.

There is also an issue about the limited amount of funds available for this area of work. One person noted that funders tend to be attracted by certain issues and then move on after a few years to something else which does not stand an organisation like CORE in good stead. In addition, CORE can be in some competition for the limited pots of funding also applied to by member organisations. Some suggested as a way round this there may be scope to ask member organisations to include, in their own funding bids, some funding for national networks and coalitions which they participate in.

Another risk in relation to funding is that some of CORE's member organisations feel somewhat compromised being a member of a body which may prove critical of the behaviour of their corporate funders. There is a growing tendency for NGOs to work in private sector partnerships, which may influence whether those NGOs prioritise corporate accountability and how far they are prepared to campaign. *"Some of the larger member organisations have a lot of private partnerships. I think this means that CORE has to tread a sensitive line between the different members in terms of what it can and can't say about corporate behaviour."*

A final risk was in relation to the growing preference for funders to direct money on this issue to the Global South as a general principle. Whilst this is leading to a number of positive changes in the NGO sector, it reduces the pool of funding available to organisations which have as their focus UK companies and UK policy and legislation. At present CORE does not have much funding to lose, but the case for ongoing funding in the North will over the next few years have to be made more powerfully than before.

#### v) Communication challenge to differentiate CORE's contribution from that of its members

Though it was felt that those who matter on the policy stage understand CORE's role, this may not apply to funders who may be confused about how far CORE is intrinsic to some of the developments around corporate accountability which have happened thus far. This review should be of value in helping to make such a case, but there is an ongoing challenge in raising CORE's profile, due on the one hand to a lack of resources for recording outputs, and on the other to the reluctance of member organisations to publically recognise and publicise CORE's work.

#### vi) The name

Three people felt very strongly that CORE is a terrible name for the organisation and neither sticks in the mind nor provides an easily identifiable description of what it does. "I think it is terrible. I always have to repeat it, and even when I explain it people are confused and ask things like 'so you work with businesses?'" This was in part born out in the course of the review where many people either got the name wrong in conversation or did not recognise it when approached for an interview.

#### viii) Limited reputation internationally

As already mentioned, CORE has a limited profile amongst the development charities and in particular within DFID. In addition, at present 'membership' is only open to organisations based in the UK whereas some felt that this missed a trick, and that opening membership to civil society organisations based overseas but concerned with the behaviour of UK companies would widen the net and bring CORE greater legitimacy, evidence and profile.

### Operational challenges and risks

#### i) Risk of losing staff member

There is much invested in the co-ordinator, and there is an obvious risk of losing both institutional memory, reputation and relationships were the co-ordinator to leave.

#### ii) Small staff size is challenging

Given that at present CORE only has one full time co-ordinator plus a part time intern, it cannot do more than it does at present (some are already amazed that it achieves what it does with such limited staffing). Any development plans therefore have to be very realistic given this constraint.

Several people also commented that single working could be dispiriting for the worker. The majority of daily decisions falls inevitably to the co-ordinator, who though supported by the board, still has to maintain their own momentum. As one person noted: *"There's only so many times people feel they can be bothered to start initiating stuff. That takes a lot out of people."*

Some felt that there would be a lot of merit in developing a proposal and funding bid to employ at least one other worker to share the load. Another full time role could take on communications and membership liaison, for example, and develop a range of consultation and information services which at present CORE does not have the resources to do.

#### iv) Communications

Though there have been considerable strides in relation to the communications work, some commented that it still does not feel fully realised as a function. This would be particularly important were CORE to have a wider 'supporter' or 'affiliate' base, and were CORE to take on a more proactive thought leadership role. Some also wanted to see CORE engaging more with press and through social media with the wider public which again would only be possible with an increased communications programme.

## 6. FUTURE CHALLENGES

This section summarises the main challenges identified in the external environment as well as the challenges people felt were specific to CORE's work.

### External challenges for CORE's work

#### Change in UK Government

Several people noted that the current climate is a difficult one to be taking forward work around corporate accountability. One person described it as *"pushing water uphill"* and it was generally felt that the challenge for the next five years would be to keep the ball rolling at all. Several of the Ministers and MPs with whom CORE had an effective working relationship have gone from government, and CORE is yet to develop relationships with those who have replaced them, though

initial signs are that they are nowhere near as inclined to listen to the messages around corporate accountability and are generally pro-business. Several organisations were quite gloomy about the prospects: *"It's hard not to feel pessimistic."*

### *Extent of corporate influence*

Partly because of this, CORE's work is needed more than ever. However, there is a culture and climate which positions corporations as having all of the answers (in another evaluation, one civil society respondent described this as 'the triumphalism of big business'). Additionally, some are worried by the issue already raised several times in this review about the collaborative positioning of some NGOs alongside business to take forward their aims. One person asked the question as to whether or not this might herald the 'corporate capture' of some NGOs as well as governments.

### *Limited resources of NGO sector for corporate accountability issues*

A recurring theme was the fact that there are few resources amongst NGOs dedicated to the area of corporate accountability. Where these exist they are usually focussed on particular issues rather than have a rounded view of the whole area of corporate accountability in the UK. Several member organisations reported reducing resources to tackle this issue, and some also reported their organisations backing off from campaigns which they simply did not have the means to participate in. One large NGO observed that: *"To be honest, the only work happening at present within my organisation is around the transparency agenda and the only reason I can justify my work with CORE is that I am thinking about the investor community. Having said that, I feel strongly that the role of corporate accountability has a major place to play in terms of our interventions as an NGO."* Another member organisation was blunter: *"It used to be a major campaign for us, but it no longer is."*

This means that not only is CORE limited in resources, but it is seeking to co-ordinate limited resources in other organisations. This brings frustrations but also opportunities for CORE if this can be acknowledged more clearly and if CORE's role in supplementing organisational agendas was recognised.

### *Some disillusionment perceptible in the sector*

There is a bit of a kick-back which is discernible in the sector which is probably to do with the slow pace of change following the introduction of the UN Guiding Principles. One person described it as follows: *"Ruggie has been talking about his wonderful consensus but the real issue is about looking to see what has actually changed."* There is also a certain anticipation 'in the air' at present around the development within the UN of a Binding Treaty (to hold companies accountable for their human rights impacts), with many fearing that the debates will polarise civil society discussions and reveal a lack of genuine willingness on the part of corporations to give an inch in terms of power and profit.

### *Challenging work to raise funding for*

With the honourable exception of a few funders, this area is a challenging one to raise money for. One person said they had been told by somebody with considerable experience of approaching funders for work on corporate justice that in her view funders were often both unaware of the issues as well as scared of the area. Linked to this is the fact that funders can pick on some of the more high profile issues and want to focus on those – so, for instance, work around the provenance of chocolate or palm oil may compel attention for a while, but then the cyclical nature of funder interest kicks in and they move on to something else. Trying to raise money in this environment is extremely difficult.

## *Challenges for CORE's work in particular*

### *Sustaining work in a difficult climate when there is no 'hook'*

Given the fact that there is not likely to be any significant policy or legislative 'hook' for CORE to engage with in the next government, the challenge will be how it focuses and sustains its energy. A

more proactive agenda was how most people felt it should now engage, but this will be a change and thus a challenge.

### *Wide-ranging nature of the topic*

CORE engages with the whole of corporate accountability which presents a wide agenda. The challenge for CORE (unlike other coalitions with a more specific focus such as Publish What You Pay) is finding issues which speak to the interests of all member organisations. As one person put it: *“There are so many different aspects – whether the role of companies in conflict situations, impact on environment, issues of corporate governance, supply chains, labour rights. And individual organisations are much more focussed on one element and have a narrow take on it.”* Again, this is where CORE adds value (by providing a more rounded picture of the whole issue), but it is still challenging to find common ground and come up with an agenda that can unite.

### *Long haul nature of the engagement*

In addition, this is not a quick fix issue. As one person observed, it has taken 10 years for CORE to build up to where it is now, and the issue itself is one which will continue to be live for many decades to come. Getting organisations engaged and motivated to keep pushing at an agenda such as Access to Remedy on which progress will be slow and difficult, but remain relevant for years to come, is a challenge – how many organisations are prepared to push such an agenda with no immediate prospect of success?

### *Pitching the policy work pragmatically*

Two other challenges identified for CORE were that:

- CORE could be too reactive to what was being ‘offered’ in terms of policy opportunity and focus on that rather than longer term goals. *“If it goes down the route of too much responsive policy development I think it may lose the trust of other organisations concerned about the conduct of UK PLC.”*
- CORE being too idealistic in terms of formulating policy.

The difficulty of translating priorities agreed in principle into realistic policy asks was raised by several respondents. This was felt to have been an issue around the development of the manifesto, for instance, where though there was broad agreement on the policy areas to be covered, there was not much detail on how those areas could and should be taken forward. There was a sense that such work may remain too idealistic and not grounded in and translatable into reality. *“I feel it has remained at information sharing level and there has not been a huge amount of effort amongst members as to how those areas could be translated into policy”.* Another person noted that an original call for a corporate responsibility ombudsman or department had been dropped over time, and questioned why. Striking the balance between the pragmatic and the principled is the key challenge here, as well as being realistic as to what it is reasonable to expect policy officials such as civil servants to achieve in the current climate.

### *Increasing member engagement whilst avoiding duplication*

Another balancing challenge for CORE was felt to be the need to increase member engagement whilst making sure that CORE does not stray into areas which member organisations are already involved in. This is covered more fully in the next section in relation to the proposed areas of work, but essentially is to do with being clear what a small and nimble coalition can do as opposed to an established and comparatively slow-moving campaigning member organisation. It was felt that this was particularly true in relation to public campaigns. One way of increasing member engagement was to hold more issue-focussed meetings and perhaps a larger annual conference.

### *Pitching the level of communication to members right*

The final balancing act is to get the communication right. Some members felt that they received too much information, others not enough. Generally members were sympathetic to the difficulty of getting the frequency of communications right for everybody, and felt as well that what they were

receiving now had greatly improved in recent times. Generally it was felt that more communications which were shorter would be a good idea – perhaps even one every two weeks, provided it was literally a few bullet points to update members on recent events and to put out calls for participation. One person described what they felt they needed as follows: *“I know it is a tricky area how much CORE puts its energy into the monthly update. How do you communicate to members who are not particularly engaged? I think perhaps it would be a good idea if, rather than have items which are ‘here’s a complicated and very specific piece of work’ which can feel quite heavy and leave you not quite knowing what to do, have items which are more ‘here are the opportunities for you to get engaged’. Make it easier for members to step into the gap and understand what they can do.”*

## 7. SUGGESTIONS FOR FUTURE WORK

The review explored potential new work areas for CORE. Some of these were suggestions made to ‘test the water’ and these are explored in the first section, below. This section then summarises the most commonly made suggestions for other areas of work emerging from the interviews.

### *Reactions to the ideas suggested*

Overall, there was some scepticism about many of the proposals based mainly on CORE’s current limited resources and the sense that with some of the proposed areas they would overlap or potentially duplicate work already being done by members. Some people welcomed one or two of the five suggestions made, but it was noticeable that there was no clear consensus amongst people as to which areas they preferred. Three quotes give an overview of common concerns:

*“Anything which is about campaigning or talking to individual members of the public require masses of resources and a relationship, and CORE is just not built up to do that”*

*“There may be plenty of scope for CORE to do any of the suggestions, but I think the first question is to ask why CORE is better (or worse) able to achieve progress than any particular NGO. CORE has very limited resources and should use them primarily to marshal and co-ordinate the resources in the field.”*

### *Suggestion 1: Targeting companies and/or sectors*

A couple of member agencies felt that there may be merit in looking at individual companies, but not from a ‘targeting’ point of view, more from the point of view of working alongside companies to get their views and case studies on how particular policies might work out in practice. One person mentioned a project undertaken by the consultancy and think-tank *SHIFT*, in collaboration with Unilever, to develop a reporting framework based on the UN Guiding Principles, for example.

The idea of targeting companies however did not sit well with anybody, partly because it was felt that this was something other NGOs already do, and partly because of the massive amount of work focusing on the behaviour of one corporation, without substantial chances of success. Meanwhile the important work on the policy and regulatory context would suffer. There was also a nervousness about the fact that some NGOs in the coalition may not want to target X or Y company because they were in collaboration with them and it could compromise their relationship.

### *Suggestion 2: Create tools to enable civil society to hold companies accountable*

People did not really understand what this meant, and though some observed that it *“sounded laudable”* it did not feel like a natural fit for CORE. One person asked the question: *“I’m not sure what is meant by this other than strategising with NGOs”*.

It was also noted that the Business and Human Rights Resource Centre is in the process of developing a toolkit (with ESCR-Net)<sup>10</sup> which will enable civil society organisations to document allegations of human rights abuses by companies.

### *Suggestion 3: Develop projects with partner organisations in the global South*

Again, this was not seen as something which was a natural fit for CORE partly because member organisations already have partner organisations in the Global South, and partly because there are already a range of networks (through the Business and Human Rights Resource Centre, ESCR-Net, ICAR, SOMO) which are specifically engaging with such organisations. An additional partner in the North could be potentially confusing and overwhelming. Better it was felt to try and establish links through those networks and potentially draw in organisations from the Global South to participate in panels, conferences or other influencing strategies.

One person disagreed and felt that this was a difficult but important role for CORE to play, but again this was around pulling the voice of civil society organisations into forums where they could amplify their messages which were better heard coming 'straight from the horse's mouth in terms of company behaviour overseas. *"I think that's much needed. Bringing the Global South voice into the policy discussions in the UK is an underdeveloped area and CORE can really develop something significant by bringing that voice here. It is very tricky and difficult, however."*

### *Suggestion 4: Work on corporate purpose, including building links with social enterprise sector*

Only two people were sceptical about this area – otherwise, it was regarded as an important and appropriate area for CORE to engage with. The doubts expressed were to do with a feeling that a mass movement away from shareholder capitalism was unlikely given the current context, and was therefore about the wisdom of dedicating resources to an area in which the 'goal' is to entirely reframe the role of the corporation within society. It also felt to the doubters rather academic: *"I feel we could get involved in a lot of conversations with no clear purpose."*

However others felt that this is a 'the big issue' and CORE is ideally placed to lead and engage in debates and policy initiatives around this. There was support for the idea from board, staff, members and government representatives. Typical comments were:

*"Its time has come in relation to wealth inequality and ecological collapse – the business models and strategies which derive from corporate purpose. The interesting thing is, when you talk to civil servants on corporate purpose they don't switch off. It's a much less threatening issue than it might seem. And some corporate leaders are also seeming to 'get' the issues around corporate purpose"*

*"Work in this area predominantly falls into the responsibilities debate rather than the accountability area. I can see this would balance well the work on accountability, but we mustn't under-resource the accountability work because of it"*

*"It's a very relevant debate and a lot of the initiatives are here such as Blueprint for Better Business. It's a bit amorphous, trying to work out what we are going to do. I would see there are profile benefits to being engaged in that debate."*

*"Corporate purpose thing is very interesting, one of those things which is quite high level in terms of thinking. It could bear fruit."*

*"I think corporate purpose is absolutely valid and naturally follows on from their Companies Act work"*

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<sup>10</sup> <http://business-humanrights.org/en/checklist-documenting-corporate-human-rights-impacts>

For those who were keen on it, it was felt that there was considerable opportunity to build relationships not only with civil society and the social enterprise sector, but also with companies who are now (at least some of them) considering this issue. *“This is the debate where the NGO sector and the leading companies can change the public debate and the policy debate. CORE can provide a space to those voices and use them to influence the space for the debate on corporate responsibilities. Currently that debate is determined by CSR, which is determined by voluntarism - there are conferences and government sponsors it. But what if CORE started to organise a different debate – through organising meetings, hearings, conferences, breakfast meetings with MPs – to foster the debate on corporate purpose rather than CSR, and discredit the other debate? That is exactly what I understand CORE is best placed to do.”*

### *Suggestion 5: Target, and work with investors*

There was a difference of opinion on this, and again it was not quite clear what was meant by ‘targeting’. There was a general feeling that if this was about targeting investors to change their behaviour, this was an extremely long term strategy and people had similar reservations to this as they did to targeting companies – it was potentially a lot of work to change the behaviour of key individuals who may then not deliver any tangible results. As one person put it: *“If you look at the role of investors to date, they have a lot of say over executive pay. Has that controlled executive pay? No. Not at all.”*

If, however, it is about trying to involve investors in making arguments for ethical corporate behaviour more generally, there may be mileage in mobilising such people from an advocacy point of view and getting them involved in some of the policy debates. Investors could, for example, add their voices to the corporate purpose debate which would create a more rounded and compelling voice to policy makers. The role of Share Action, which already works with investors, was also noted and CORE’s work would need to be differentiated from theirs.

## *Other suggested priorities for CORE’s future work*

### *Changing the way CORE works*

The priorities which emerged were:

#### **i) To increase CORE’s thought leadership role**

There was broad agreement that CORE could play a more proactive role in setting the agenda and enabling the formulation of what the change points and opportunities are to achieve wins in terms of corporate responsibility and accountability. It was noted that though there is a lot of ‘noise’ through public information campaigns such as Avaaz and 38 Degrees, a detailed analysis is lacking of where the potential opportunities are and of the policy asks that should be made. Looking at the behaviour of financial institutions in overseas investment was one potential area. The main message was that rather than try and respond to the specific agendas of individual member organisations, and rather than be ‘distracted’ by trying to popularise or simplify a message ‘for the general public’, CORE should step into a role of thought leadership. Informants felt that this was about both guiding member organisations towards key issues, as well as formulating workable policy proposals which can then be promoted.

#### **ii) Watch tower role**

Linked to this, members are keen to see CORE continue to play a role which alerts them to potential opportunities to engage. A common theme was that no single member organisation felt able to have an overview of the entire field, and that CORE’s added value for them was very much about providing a reassurance that they would be alerted to anything important. Members want CORE to continue this, to filter out information for them and to ensure that they are engaged where necessary.



### iii) Harness better the specialisms and resources of coalition members

Getting the membership engaged and more active should be a priority. Surprisingly perhaps, several members were clear that they would like CORE to be more 'propositional', and engage people in thinking about issues and tap into expertise which exists within organisations already. *"Get people more involved, get the advocacy people in member organisations involved, look at international funding programmes as well"*

One suggestion was to send out information about what individual organisations were doing to help member agencies understand the range of activity going on across the coalition. Another was that CORE should recognise (perhaps on their website) that some organisations contribute resources 'in kind' in the form of staff time and specialism. Webinars were also mentioned by some as a good way of engaging. The over-arching message was that members want CORE to better harness the resources they have: *"They could help us help them deliver an awful lot more"*

### iv) Revitalise APPG

The activity level of the APPG declined in the final twelve months of the 2010 Parliament and now with the new Government in place, the APPG would have to be reconstituted. Some feel that it should be a priority for CORE to revitalise the group. There was a suggestion that CORE could seek funding for an APPG co-ordinator, acting on behalf of CORE and its membership, who would be a dedicated resource working in parliament.

### v) Develop a more popular message and narrative

Though there was general agreement that CORE should not be focusing attention on educating and informing 'the public', it could nevertheless use media opportunities better to reinforce its core messages. Rana Plaza was mentioned as one of those moments when attention is briefly focussed on corporate behaviour, but where the opportunity may be lost if there are not policy solutions which are ready to be aired and discussed. Those moments should be capitalised on: *"I've always tried to argue that you need to bring it into a more public sphere. Where you see things like the Rana Plaza collapse there is a groundswell of support there but we are not seizing that moment. Having experts discuss such events is worthwhile, but at the same time we need to be thinking how we get the public aware of all these terrible things which are happening, and why."*

This linked with a desire some have to develop materials and narratives which move CORE away from the technical policy language, a lot of which is felt to be quite impenetrable, towards describing problems and potential solutions in ways people can understand. This may also be helpful for getting individuals and other organisations to become members of the coalition. *"We need to move away from always saying extra-territoriality – this is jargon. I think CORE has an opportunity to demystify some of the language and make it come alive for many more people than is at present the case."* Case studies are a good way of illustrating theoretical points, and CORE has already had some discussions about using these more systematically. *"They asked us if we would be willing to cooperate with them and provide case studies."*

I think that's exactly the kind of thing CORE should be doing, using hooks and media opportunities to put a spotlight on the behaviour of UK companies abroad."

### vi) Create a five year plan and key priorities

*"I think it is very important that they get people to their meetings and have the discussions about the strategy and their objectives. They may have it – but they need to establish a 5 year plan, just because we have a new government with objectives which would lead into the manifesto of 2019. We need to work longer term, with solid objectives and targets."* (Member organisation)

## What CORE should focus on

### i) Make sure that the wins achieved are enacted

One area for suggested focus was to look at how the legal gains achieved thus far are adhered to through regulation. The example given was in relation to the Modern Day Slavery Act, where it was felt that there may be an argument for looking at how the regulation pans out. *“A lot of the reasons people argue against regulation is that people say ‘it makes no difference’. But perhaps we should look at ‘how we ensure the regulation on the books taking forward the legislation we fought hard for actually delivers what we want’”* One way of doing this could be to take a sector or a few companies and use them as a test case to see whether or not the law and regulations are making the differences that were hoped for, and if not draw attention to that.

#### ii) UK Business and Human Rights Action Plan

Making sure that the UK National Action Plan on Business and Human Rights is taken forward and does not end up a ‘damp squib’ (as one person put it) is a clear priority for some. *“If it doesn’t bring anything relevant it will be a major blocker for the debate on corporate accountability in the UK.”* Currently the Action Plan is being updated, and there is an expectation that CORE will input on the next draft when it comes out. Keeping focus on this should be a priority.

#### iii) Access to Remedy

Capitalising on the third pillar of Ruggie was also mentioned as a key policy area to focus on given that it is the first time there has been international recognition that Access to Remedy is both important and neglected, and that unlike voluntary codes of conduct would require businesses to be held to account. *“I think the Access to Remedy issue is becoming increasingly important. The frustration over the proper lack of redress for organisations whose focus is working with communities directly is the key point, really.”*

#### iv) TTIP

One member said that CORE had decided not to do anything on this as other member organisations are doing significant work on it, including public campaigns, whilst another member said that they felt that there was very little work happening on TTIP generally and that CORE could get involved. They felt that activity is currently not co-ordinated and that there is an absence of high level advocacy which is worrying. *“I have heard Lord Livingston say ‘nobody is interested in TTIP apart from WDM (since renamed ‘Global Justice Now’). And the TUC are fairly ambivalent about TTIP. And Global Justice Now don’t believe in advocacy, they believe in mobilisation. But that mobilisation isn’t exerting influence over this. TTIP is now getting a higher profile – the Investor-State Dispute Settlement mechanism in particular. CORE could have got involved with this.”*

## 8. FINAL WORD

- *“I do think CORE is fantastic and the potential is enormous. Really glad you are doing this piece of work.”*
- *“I like the CORE coalition – I am happy to help. That’s why I prepared for this.”*
- *“I think doing this review and getting 360 degree feedback is a brave thing to do. Very good practice”*
- *“I’m very, very positive about the organisation – I think it is great. It needs to evolve, but generally it’s great.*
- *“I continue to be impressed with the commitment of CORE and what it achieves on its limited resources.”*
- *“We are supporting the coalition as we think it is invaluable. It would be great if we were being prodded by the coalition to do more.”*

### Appendix A – Methodology & list of people interviewed

The strategic review was primarily qualitative though it also took account of a range of documentation provided by CORE. The review was scoped in detail with the co-ordinator (April 2015) who was invited to make a purposive selection of interviewees to ensure a perspective spread. A wide range of potential respondents were identified (51 in all) on the assumption that only some of those would respond. All potential respondents were contacted at least twice.

Respondents fell into one of the following categories: Staff and board members; member organisations; partners and allied organisations/individuals working in the same field; policy ‘targets’ (i.e. those who CORE is seeking to influence) and funders. 28 purpose interviews were then conducted via telephone or by Skype, and one respondent submitted written comments. A list of those interviewed is below.

Following the fieldwork, a draft report was produced for a discussion with staff and board members via telecon. From this points were refined or further clarification sought on some topics. The evaluator then produced the final report.

The analysis took a grounded theory approach whereby all benefits and issues were noted and the emerging themes then reported.

Allan Hogarth	Amnesty International
Andy Whitmore	London Mining Network
Anne Lindsay	CORE Board member (CAFOD)
Beverley Duckworth	CORE Board member (Freelance advocacy and strategy consultant)
David Chivers QC	Barrister, Erskine Chambers
Filip Gregor	European Coalition for Corporate Justice/Frank Bold
Fiona Gooch	CORE Board member (Traidcraft)
Francis Evans	Business Environment Directorate, BIS
Francis West	UNICEF
Graham Gordon	CAFOD
Ilaria Miller	Policy Adviser, BIS
Janet Williamson	TUC
Joanne O’Neill	SCIAF (Scottish Catholic International Aid Fund)
Kate Macdonald	University of Melbourne; Author of ‘Reality of Rights’
Ken Boyce	Christian Aid
Mauricio Lazala	Business and Human Rights Resource Centre
Louise Rouse	Consultant, Ex-Director of Engagement at Share Action
Marilyn Croser	CORE Staff (Director)
Nick Perks	Joseph Rowntree Charitable Trust
Owen Epsley	War on Want
Peter Frankental	CORE Board member (Amnesty International)
Rachel Wilshaw	OXFAM
Radhika Sarin	OXFAM
Richard Dyer	Friends of the Earth
Robert McCorquodale	Professor and Director at British Institute of International and Comparative Law
Ruth Chambers	Advocacy Consultant (freelance) who has worked for CORE
Shanta Martin	CORE Board member (Leigh Day)
Sue Charman	WWF-UK
Will de Villiers	CORE intern (Communications and Advocacy)