

Fundraising from the Public

The Panama Papers Activities: An Internal Learning Review for the Transparency International Secretariat

July 2016

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1. Review Purpose

This learning review has been commissioned by [REDACTED] at the Transparency International Secretariat (TI-S) to identify what internal lessons can be learnt from the Panama Papers public fundraising activities. It has been written by Chris Washington-Sare, Managing Director at Pentatonic Marketing.

The learning review is informed by Pentatonic Marketing's experience of working with TI-S over several years, our advisory involvement in the Panama Papers fundraising activities and interviews with a range of key stakeholders, specifically:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

The report is intended to be a constructive and impartial analysis of what TI-S could do to improve public fundraising in the future. With this in mind it is important to note:

- We are mindful that TI has had limited experience of fundraising from the public. Reactive¹, rapid response public fundraising requires perhaps the most co-ordinated and integrated ways of working. Whilst this report focuses on *reactive* public fundraising, we strongly believe that the findings are relevant for *all* TI public fundraising activities. The Panama Papers activities are simply a way of contextualising organisational challenges when it comes to public fundraising.
- As a result of public fundraising not being embedded in the culture of TI-S, it will, by definition, require a change of culture. However, we believe that the *rapid* nature of the Panama Papers public fundraising activities have more strongly highlighted the need to integrate public fundraising into the culture of the organisation.
- Pentatonic Marketing has worked with many organisations across the globe to develop public fundraising strategies. Whilst the findings in this learning review may make for uncomfortable reading, we would like to re-assure TI that you are not alone when it comes to finding public fundraising a challenge. Public fundraising is tough, requires skill, commitment and an appetite for risk that is difficult for many organisations to accommodate. We believe that TI can make a success of public fundraising – there are already some interesting examples taking place in chapters – there just has to be the willingness to want to change.
- We acknowledge that TI-S is under-going an organisational change process. Whilst this report has been written in isolation of that broader change process,

¹ In this context, reactive public fundraising can be described as fundraising activities that respond to the external news agenda, demanding a nimble and swift response

we believe the findings and observations are extremely relevant and would recommend the learning review be read by staff directly involved in change management matters.

- The majority of stakeholders interviewed have requested a copy of the review and it is assumed that this will be circulated appropriately.
- This review's main focus is on the behaviours and attitudes that we have observed or have been reported by stakeholders. We believe that TI-S can make changes to systems and processes but without a fundamental change in behaviours and attitudes the organisation will continue to have difficulties fundraising for the public.

2. Context

The Story

On 3 April, the International Consortium of Investigative Journalists (ICIJ) published a massive leak of documents, dubbed the Panama Papers².

The more-than 11 million documents, which date back four decades, are allegedly connected to Panama law firm Mossack Fonseca. ICIJ reported that the firm helped establish secret shell companies and offshore accounts for global power players. ICIJ reports that a 2015 audit found that Mossack Fonseca knew the identities of the real owners of just 204 of 14,086 companies it had incorporated in Seychelles, an Indian Ocean archipelago often described as a tax haven.

The documents reference 12 current or former world leaders, as well as 128 other politicians and public officials. In addition to allegations involving associates of Putin, Cameron and FIFA, the papers also accuse the prime minister of Iceland, Sigmundur David Gunnlaugsson, of having ties, through his wife, to an offshore company that were not properly disclosed, while Argentina's President Mauricio Macri is alleged to have failed to disclose links to a company in his asset declarations.

Mossack Fonseca is unapologetic. *Our industry is not particularly well understood by the public, and unfortunately this series of articles will only serve to deepen that confusion. The facts are these: while we may have been the victim of a data breach, nothing we've seen in this illegally obtained cache of documents suggests we've done anything illegal, and that's very much in keeping with the global reputation we've built over the past 40 years of doing business the right way, right here in Panama.*

Obviously, no one likes to have their property stolen, and we intend to do whatever we can to ensure the guilty parties are brought to justice.

But in the meantime, our plan is to continue to serve our clients, stand behind our people, and support the local communities in which we have the privilege to work all over the world, just as we've done for nearly four decades.

The biggest consequence of the leak is the massive blow to secrecy – the biggest selling point of offshore tax havens. It was clear to TI-S that the high profile scandal aligned very closely with the organisational mission to stop corruption and promote transparency, accountability and integrity at all levels and across all sectors of society.

² Source: <http://edition.cnn.com/2016/04/04/world/panama-papers-explainer/>

3. TI Response

Within days of the story breaking TI-S initiated a ‘rapid response’, reactive approach to public fundraising.

TI-S Public Fundraising Activities

By 7 April the website home page had been amended to direct visitors to a donation form landing page and article (see Appendix 1).

Additionally, paid for social media activity on Twitter and Facebook was implemented from 10 April (see Appendix 2). The ads generated some adverse comments (trolls) which caused TI-S to be less assertive with its paid for social media activity.

An email was sent out to existing RDD supporters (409 people) requesting donations. The open rate was 40.5% which could be considered good. 18 of these people clicked through to the donate page (10.8%) – which is lower than we would expect. 2 people donated which equates to an 11% conversion rate which, for online giving, is reasonable. It appears that TI-S should aim to improve overall click through rates by making the email content more compelling for the reader.

Additional email based funding plans originally included using the Daily Corruption News and trying to encourage TI-S staff to tap into their networks. However, these plans were curtailed due to some delays, amongst other things, in determining whether certain email lists could be used for fundraising (it was eventually found out they could) and technical challenges. Combined, it was felt that the moment had passed.

TI-S also aimed to launch a petition at some points (which could have provided an important “lead generator” for future fundraising asks), but did not do so eventually.

Internal stakeholders have reported being under-whelmed with the response to the activities and reported minimal numbers of donations and moderate levels of engagement via social media. Between 8-13 April, 9 donations were received totaling €404. This means the average gift was €44. In comparison research indicates that the average online gift in the UK in 2014 was equivalent to approximately €80. This would indicate that TI-S could develop approaches that not only aim to convert more people to donate but to also increase average gift amounts.

Competitor Activities

Other organisations launched petitions and other social media engagement activities much more quickly than TI-S and generated significant responses (see Appendix 3).

Oxfam, for example was one of the earliest movers, launching a petition on 4 April. 38 Degrees launched a petition on 5 April and by 8 April had already generated 111,000 signatories.

Rather than initiate a petition, the ICIJ produced a series of educational emails that people could subscribe to. This had the effect of keeping the issue alive and in the minds of recipients. The ICIJ website featured a donate button.

4. Summary of Issues

Pentatonic Marketing’s analysis has identified what we believe to be 18 different issues that are having a negative impact on the ability of TI-S to raise funds from the public.

These are summarised below and then expanded on in the pages thereafter. At the end of the review we have made recommendations to address some of these issues.

Behaviours	Issue
Leadership and Culture	<ol style="list-style-type: none"> 1. Cultural Mis-Alignment 2. Values Disconnected With Behaviours 3. Fundraising Leadership
Communication	<ol style="list-style-type: none"> 4. Dysfunctional Relations 5. Damaging Myths and Stories 6. Perceived Resistance to Fundraising 7. Ineffective Decision Making 8. Uncoordinated Planning
Collaboration	<ol style="list-style-type: none"> 9. Poor Staff Engagement 10. Unclear Responsibilities 11. Inefficient Structure 12. Weak Systems and Processes
Empathy	<ol style="list-style-type: none"> 13. Lack of Empathy
Adaptability	<ol style="list-style-type: none"> 14. Lack of Clear Objectives 15. Poor Accountability
Technical	<ol style="list-style-type: none"> 16. Poor Understanding of Available Skills 17. Weak Knowledge Management
Analytical Thinking	<ol style="list-style-type: none"> 18. Poor Use of Data Insights and Analysis

5. The Change That Needs to Happen

In reviewing TI-S's reactive public fundraising activities and concurrently monitoring other organisations we would suggest the following needs to be in place in order to be successful.

Required Ability	Dependency
The ability to respond extremely swiftly – literally within a matter of hours	<p>The ability to re-prioritise existing workloads</p> <p>The ability to re-assign staff and have clear roles, responsibilities and authorisation processes</p>
The ability to take people on a journey of engagement – from initial awareness, through to low level commitment (signing a petition for example) and on to conversion to higher levels of commitment (sharing content, donating etc	<p>The ability to integrate reactive messaging with existing on-going work</p> <p>The ability to develop convincing, compelling and emotionally engaging content</p> <p>The ability to monitor results and take immediate action to adapt and amend materials</p>

At a recent public fundraising workshop, facilitated by Pentatonic Marketing and held in Berlin with eight TI chapters, participants identified the changes that need to take place within the organisation to facilitate public fundraising. Their insights dovetail perfectly with the observations in this report and are summarised in the following diagram:



6. Recommendations

Based on our observations contained in the following pages, our recommendations are as follows:

Behaviours	Recommendation
<p>Leadership and Culture</p>	<p>We would recommend that TI-S establish a clear and persistent vision of what the organisational public fundraising culture should be and of what changes need to be applied.</p> <p>This public fundraising vision must be understood by staff at all levels and spread across the organisation and integrated with the values of the organisation.</p> <p>The TI-S leadership needs to ensure they actively demonstrate commitment to promoting public fundraising as a critical element of the broader TI public engagement work and in attempts to diversify the funding base.</p> <p>The TI-S leadership then needs to consciously manage the public fundraising culture using health assessments and employee surveys to evaluate progress and direction.</p>
<p>Communication</p>	<p>If TI-S wishes to conduct public fundraising activities (including reactive work) in the future, an appropriate plan of action needs to be developed demonstrating how public fundraising is an integral part of TI-S's broader public engagement work.</p> <p>This plan needs to be produced in a consultative manner, ensuring key stakeholders from across the organisation are engaged early on in the process.</p> <p>We would recommend that TI-S integrates public fundraising into its campaign communications, using online fundraising communication to support existing communication programmes. TI-S should aim to take supporters on an engagement journey to build trust and confidence in TI's work, speaking with simplicity, clarity and emotional directness.</p>
<p>Collaboration</p>	<p>We recognise that TI-S is in the process of recruiting a Head of Public Fundraising. However, we would recommend that the fundraising department is stand-alone and cuts-across groups rather than is embedded in one.</p> <p>This dept needs to be sustainably funded and delegated</p>

Behaviours	Recommendation
	with the authority to develop and improve fundraising activities in collaboration with Communications, Advocacy and Policy colleagues.
Empathy	It is important that TI-S has in place reward and recognition systems (both formal and informal) in place to motivate and engage staff to act appropriately, including using a range of skills, behaviours and attitudes required for successful public fundraising
Adaptability	<p>We would recommend TI-S develops a TI-S-wide Rapid Response <i>Public Engagement</i> process (that is not only news/media focused), enabling the organisation to swiftly respond to emerging external news items.</p> <p>The process needs to be applicable for all functions including Communications, Fundraising, Advocacy, Policy and ICT.</p> <p>The process needs to specify roles, responsibilities, approval processes and establish easily assessable criteria to green light integrated public engagement activities.</p> <p>Supporting this process should be appropriate systems including a:</p> <ul style="list-style-type: none"> • Single source for all TI-S supporter data • Robust content management system for the website • Payment processing platform that integrates seamlessly with other TI-S systems. <p>We would recommend that TI-S public fundraising activities should aim to engage first and then convert to donate. TI-S should aim to convert as many of its supporters to becoming donors – any one showing interest in TI should be asked appropriately to donate to support your work. Additionally TI-S needs to ensure its non-fundraising communications aim to capture email and telephone numbers where appropriate.</p>
Technical	We would strongly recommend that TI-S conduct public fundraising skills assessment (to include an assessment of fundraising, marketing and communications skills) where members of staff score themselves and least two colleagues – ideally one direct report – are also asked to score the staff member (anonymously) using the same

Behaviours	Recommendation
	<p>skill framework and scoring scale.</p> <p>The findings can then be used to identify areas for public fundraising development and Personal Development Plans can be created accordingly.</p> <p>The findings should also be shared in an appropriate manner so people are aware of the skills that reside within the organisation.</p> <p>We would recommend that TI-S uses a variety of fundraising techniques to generate donations. Don't just rely on one source. Cultivate the skills and capacity to run joint online and offline campaigns that improve supporter engagement. People who give both online and offline are more likely to keep giving than those who donate exclusively online or offline.</p>
Analytical Thinking	<p>We recommend that TI-S develop a public fundraising monitoring and evaluation (M&E) system that can be applied to any public fundraising situation.</p> <p>This will only be useful if the findings arising from the M&E system are applied to improve future fundraising activities.</p> <p>It is also suggested that a report should be produced identifying the lessons learnt from the Unmask The Corrupt campaign as an example of how the organisation has integrated communications and fundraising into proactive (rather than reactive) campaigns.</p> <p>We would urge TI-S to test, test and keep on testing to identify what works well for public fundraising. Assume nothing and do not over-estimate the fundraising potential of social media. Research indicated that in 2012 only 1% of online giving was social generated from Facebook and Twitter – of course this will increase over-time but social media is great for raising profile and awareness of the issue, less so for direct fundraising activity. Research indicates that email generates at least 1/3 of all online donations. Identify the right online platforms for your organisation, and continue to build and engage your community on these platforms. The loyalty and voice you cultivate lays the cornerstone for your public fundraising campaigns.</p>

7. Review Methodology

The foundations for good public fundraising are founded on:

1. Inspiring, motivated fundraisers who are able to...
2. Articulate emotionally compelling fundraising propositions...
3. Reflecting the depth and breadth of an organisation's programme of work...
4. Which are delivered appropriately and effectively to the intended target audiences

We have used the Pentatonic Managerial Behaviours Assessment³ methodology to frame the review of TI-S public fundraising activities around the Panama Papers.

Whilst these skills are clearly applicable far beyond just public fundraising, they are nevertheless essential for achieving the TI-S ambition of developing public fundraising as a sustainable income stream in the future.

The methodology is based on reviewing 35 different managerial skills clustered into seven thematic groups. The 35 skills have been identified as the most important skills that managers need to possess in order to lead and inspire the people they work with and/or manage.

Typically the Pentatonic Managerial Behaviours Assessment is used as a tool for individuals to identify areas of weakness through a process of self-assessment and peer review.

It is important to note that the scores presented in the following pages are indicative and represents the opinion of Pentatonic Marketing specifically in relation to the behaviours exhibited around the Panama Papers fundraising activities. For clarity, outside of the Panama Papers fundraising activities, the skills may exist within the individuals, departments or functions at a much higher or lower level than are rated here.

As mentioned in the previous section, we strongly believe that the observations we make are completely transferable to other public fundraising activities that TI-S may embark on in the future.

NOTE: Some content in this section has been redacted to protect Pentatonic Marketing's intellectual property

³ Property of Pentatonic Marketing Ltd

8. Situational Assessment

Analytical Thinking

Indicative Managerial Behaviours Assessment Scores

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Observations

It appears that the general view from interviewees is that the Panama Papers fundraising activities were a good exercise simply because nothing like it had been tried before.

When asked if TI-S should do this form of public fundraising again, the answer was, by and large, affirmative. The general feeling was that the organisation has the opportunity to learn a lot from the experience. Experiential learning was perceived by interviewees as being a more effective way of learning than theoretical strategising and analysis of systems and processes. The consistent view was that the organisation moved swiftly, but things could be improved.

Public fundraising is, essentially, a continual testing process. Typically a fundraising proposition will be presented to the public (for example via an email or a webpage). In order to improve performance, fundraisers will develop rigorous testing frameworks to identify those elements of the fundraising proposition that elicit the best response.

Several stakeholders were keen to point out that whilst the Panama Papers fundraising activities were not successful from a financial perspective, TI-S cannot say they were a failure because rigorous testing of different approaches did not take place. (We acknowledge that a limited amount of testing took place with paid for Twitter posts).

Leadership and Cultural Behaviours

Indicative Managerial Behaviours Assessment Scores

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Observations

Cultural Mis-Alignment

The culture of an organisation is made up of a number of components including structures, systems, processes, behaviours and values. During the interviews, several comments were made theorising that the organisational culture was not fit for engaging the public appropriately. There was a belief expressed that TI-S needs to change the way it operates and narrative it communicates to the public. Interviewees expressed a concern that the current TI narrative and advocacy asks are not aligned with the way individuals relate to the organisation's work. Delving into this issue, it became clear that many stakeholders believe that the TI-S 'esoteric' language and rarified way of describing issues hampers successful fundraising from the public.

Part of the organisational cultural mis-alignment appears to be related to attitudes to risk. By its very nature public fundraising is an activity that carries risk. Interviewees reported a concern that the organisation is too risk averse and if it were less so, investment in public fundraising would be less constrained.

When asked, what words best describe how people worked together on the Panama Papers fundraising activities interviewees chose words including *inflexible*, *slow*, *inefficient* and *incompetent*. In contrast, when asked, what words best describe how people should work together internal stakeholders chose words including *creative*, *respectful*, *flexible*, *innovative*, *committed*, *agile* and *energetic*.

It appears there is a significant gap between how stakeholders believe the organisation should behave and how internal stakeholders perceive the organisation actually does behave when it comes to fundraising from the public.

Values Disconnected With Behaviours

Of significant concern is the feedback we gathered indicating that several stakeholders observed TI's values of Transparency, Accountability, Solidarity and Courage are not being demonstrated by staff, and in particular TI's leadership. By 'leadership' it was heavily implied this meant the TI-S senior leadership team but interviewees did not specify the difference between the Management Team or the Heads of Groups and Departments. Interviewees responses indicated:

- A lack of clarity about decision-making processes (value: transparency)
- A lack of clarity about the results of Panama Papers fundraising activities (value: accountability)
- There were bottlenecks and territorial behaviours (value: solidarity)
- An organisational apprehension in asking for money generally (value: courage)

Fundraising Leadership

In part these views are informed by a perception that TI's senior management team is not fully committed to public fundraising. Several interviewees felt that what the organisation said it needed to do (raise money from the public) did not match with the organisational commitment to do so. A more decisive and committed public fundraising approach was recommended by many interviewees, coupled with a confidence to ask for support effectively. However for this to happen interviewees expressed the view that the culture needs to change.

Changing culture isn't as simple as identifying the new behaviors TI wants to see and articulating a new set of beliefs and values associated with these. Most people won't change their behaviors until:

1. They observe the leadership in their organisation acting differently, role modelling the behaviours that are to be encouraged
2. When they see exemplars of good practice and behaviour being positively recognised

We would suggest that a culture change, whilst needed, will be difficult to implement. Whilst interviewees have the willingness to change, the interviewees revealed a significant skepticism about the opportunity to change the culture of the organisation because the organisation. This in part was attributed to a lack of visionary thinking and the inability of senior managers to delegate responsibility appropriately.

Communication Behaviours

Indicative Managerial Behaviours Assessment Scores

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Observations

Dysfunctional Relations

All interviewees reported that there were dysfunctional relationships between individuals and functions that hindered operational effectiveness. There was no consistency in where stakeholders believed the problem lay and dysfunctions were reported between Communications, Fundraising, Policy, Advocacy and ICT. The reason for this dysfunction was attributed to a combination of personality clashes between individuals and a lack of respect for the work of others. Stakeholders reported that there appears to be a fundamental lack of clarity about who has the final say when it comes to making important decisions.

Damaging Myths and Stories

It appears that there are a number of myths and stories helping to compound the poor communications between different functions. Whilst no specific 'hard' evidence was cited for these stories, a significant proportion of stakeholders recounted their perceptions of how functional units were perceived by other stakeholders. These comments revealed a mis-understanding or lack of awareness of the stress and strains that different functions were under. Stories around perceived power struggles were frequently recounted, primarily driven by a perceived over-bearing bureaucracy and mis-placed need to excessively consult.

Perceived Resistance to Fundraising

Most stakeholders who were interviewed reported that they felt there existed a resistance to fundraising from the public. No hard evidence was presented to presented but it was noticeable how many interviewees said that the organisation needed to change its 'old school' mentality towards fundraising and stop perceiving it as a necessary evil.

Ineffective Decision Making

It is clear from speaking with stakeholders that there is a need to improve how verbal and written communications are utilised when addressing public fundraising activities. Frequently stakeholders reported they only had a partial input into the Panama Papers fundraising activities or were only asked to input into specific issues too late in a process to have any meaningful influence. Stakeholders reported that they believed decisions were being made inappropriately and once a decision was made, there was no flexibility to change it.

Some interviewees reported that meetings were too aggressive and opinions from people were not being considered appropriately. In general, interviewees felt that the current TI-S decision-making processes were not suitable for implementing rapid response fundraising activities.

Uncoordinated Planning

It appears that there was no over-arching plan informing how the reactive Panama Papers public fundraising activities should be prioritised and incorporated into other pieces of work.

Stakeholders reported that the Comms team became extremely stretched with the competing priorities of:

- Crisis communications management in the light of the Chile/Panama Papers connection and a CNN enquiry
- Launching reactive public fundraising activities off the back of the Panama Papers
- Continuing campaigning work on other activities such as Unmask The Corrupt and Delaware

Collaborative Behaviours

Indicative Managerial Behaviours Assessment Scores

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Observations

Stakeholders reported whilst the organisation had moved faster than it had ever done before, it still was not fast enough. This assertion is confirmed by the fact that other organisations were quicker out of the blocks to launch their Panama Papers activities.

Poor Staff Engagement

We received extensive feedback indicating that many staff were resentful about how they were engaged and expected to contribute to the public fundraising activities. It was noticeable that the majority of the interviewees expressed very strong frustration and dissatisfaction with a variety of issues related to the work environment. Compared with other organisations with which Pentatonic Marketing works, the levels of frustration were very marked. Feedback indicates that TI-S colleagues do not treat each other with respect and cited examples of behaviours that appear to be deliberately obstructive.

Unclear Responsibilities

Most stakeholders were not aware of what their role was during the Panama Papers fundraising activities and several people felt that their contribution could have been stronger.

It appears that accountabilities and responsibilities for conducting the Panama Papers fundraising activities were not sufficiently clarified. This meant that there was consultation paralysis and decisions were delayed and not made decisively. Some interviewees felt that decisions were being made 'on the fly' with little consideration for the knock on effects on other pieces of work.

It appears that the TI-S habit of decision-making by consensus may be inappropriate for rapid response public fundraising activities. We would suggest that empowering people to give them decision-making authority with clear sign-off processes may be a way of changing the status quo.

Inefficient Structure

It appears that the structure of the organisation does not encourage the type of collaborative working required to facilitate fundraising from the public. Stakeholders reported that TI-S was functionally driven not objective-driven. The lack of a proper marketing function was seen as a challenge. We understand that there have been attempts in the past to become more marketing focused but, as interviewees

reported, these have failed because the vision of marketing people is too “exotic” for the TI-S culture.

It appears that certain functions critical to effective public fundraising (ie: website management, donation processing, data management) are split over multiple functions making it extremely difficult to co-ordinate work swiftly.

Additionally several stakeholders raised concerns about inadequate staff resources having a negative impact on the ability of the organisation to react quickly. In some instances the lack of resources was viewed as an organisational risk particularly in the areas of social media management.

Weak Systems and Processes

Despite having an existing editorial process in place for reviewing reports and a Rapid Response Comms Unit (see Appendix 4), both of which could have been adapted for the purposes of rapid response fundraising, collaborative working behaviours were hindered by inadequate systems and processes.

Interviewees reported back office systems and processes that were, in our opinion, very fundraising unfriendly.

The lack of systems and processes cannot be used as an excuse for the poor collaborative behaviours – but certainly they played a significant part. Stakeholders drew attention specifically to:

- “*Arcane*” donation payment processing systems featuring multiple reporting systems, manual receipting and email reporting. Three functional teams were reported to be involved in donation payment processing (ICT – payment gateway; Finance – reconciliation; RDD – processing)
- Website management processes where different elements of the site are managed by different teams and any changes require extensive consultation with multiple stakeholders
- Brand management rules which were applied strictly, with a perceived lack of flexibility being demonstrated in emerging situations. The colour and position of the donation button was often cited as a bone of contention.
- Multiple email lists with no process for de-duplicating names or cleansing data. It was reported that different people in different functions managed different email lists. It appears that the disparate data sources – Unmask the Corrupt, RDD data, DCN – are not unified and siloed fundraising activities take place according to where the list is being managed within the organisation. It is Pentatonic Marketing’s opinion that this is completely antithetical to the principles of donor-centric fundraising communications.
- Confusion about the use of petition platforms and how petitions can serve both advocacy and fundraising purposes

Empathetic Behaviours

Indicative Managerial Behaviours Assessment Scores

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Lack of Empathy

Empathetic behaviours are often over-looked when assessing organisational behaviours, but they are at the core of how stakeholders *feel* about an organisation. Highly empathetic organisations tend to be highly successful⁴ because staff are motivated and energised. Google is an example of a highly empathetic organisation that clearly values its staff.

Feedback from stakeholders indicates that TI-S is not a particularly empathetic organisation. Stakeholders reported cases of silo working, with teams appearing to begrudge working together.

We acknowledge that some individual teams may recognise their immediate colleagues' performance (but have no specific evidence to confirm this) but broadly speaking, positive feedback and positive recognition appears to be lacking across the organisation. Interviewees reported 'feeling used' and not respected during the Panama Papers fundraising activities.

Several stakeholders noted that TI is going through a transition from being a research-focused organisation to a campaigning organisation. In the draft External Communications Strategy it is stated that one of the TI-S's new roles is: "Leading global and regional advocacy, including policy, communications and campaigning".

However stakeholders observed that the organisation needs to communicate in a much more engaging, approachable and empathetic manner if it is to succeed in campaigning and fundraising from the public.

⁴ See <http://insights.ccl.org/wp-content/uploads/2015/04/EmpathyInTheWorkplace.pdf>

Adaptability Behaviours

Indicative Managerial Behaviours Assessment Scores

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Observations

Whilst it appears that innovative and entrepreneurial thinking was strived for within some parts of TI-S by adopting a 'rapid response', reactive approach to public fundraising, this appeared to be stifled by a resistance to new ways of working.

Lack of Clear Objectives

Feedback indicated that clear goals were not established meaning stakeholders were not united on a shared change objective. When asked what was the objective of the public fundraising activities around the Panama Papers, interviewees' answers included:

- *To change the culture of TI to raise money from the public*
- *To test out fundraising from the public that's linked to breaking news/scandals*
- *To test messages, processes, utilise opportunity around the Panama Papers and fundraise from the public*
- *To collectively better understand what it takes and testing our approach and systems to successfully fundraise from the public off the back of a major scandal*

This indicates that there was an unspoken acknowledgement that testing public fundraising was the objective – but over and above this, not criteria for testing were mentioned.

Poor Accountability

Response from TI-S stakeholders indicates that no one person was deemed to be accountable for sanctioning and championing the delivery of reactive public fundraising activities. As a result, data about targets and outcomes was not shared and many stakeholders report being unclear about the success, or otherwise, of this initial public fundraising activity.

Interviewees broadly concluded that regardless of the objective they identified, it was only partially achieved or not achieved at all. One of primary reasons for this was attributed to timing. The Panama Papers story broke on newswires on Saturday 2 April. Stakeholders reported that by Monday 4 April key communications messages had been agreed. It has been reported that the decision to conduct reactive public fundraising was communicated to the Comms Dept on Tuesday 5 April, which meant existing messages had to be reviewed once again.

As a result, it appears that several stakeholders questioned the very principle of reactive public fundraising in this instance. Concern was expressed about fundraising off the back of a news agenda that was not related to any specific TI campaign. Likewise interviewees questioned the wisdom of not relating the Panama Papers to Delaware or Unmask the Corrupt. Of particular concern was the potential of media backlash by conducting public fundraising whilst the problems in Chile prevailed.

Technical Skills

Indicative Managerial Behaviours Assessment Scores

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Observations

There appears to be little in the way of shared understanding about what fundraising skills already reside within the organisation. As a result there is skepticism that anyone within TI-S can contribute anything meaningful to further public fundraising activities.

Interviewees reported that it appears that no one within TI-S has the credibility to conduct public fundraising activities. Interviewees reported that there is insufficient knowledge about what skills reside within the organisation related to public fundraising.

Poor Understanding of Available Skills

From the interviews we conducted, we believe that several stakeholders have either directly relevant public fundraising experience or, at the very least, extremely pertinent ideas. Interviewees made interesting comments on a range of topics indicating that their views and opinions could have helped the Panama Papers public fundraising activities. Interviewees observed that:

- The language TI-S uses to engage the public needs to be simplified
- A more rigorous approach to testing needs to be adopted, split testing different approaches to yield better results in the longer term
- The donation form did not make use of best practices and was too text heavy and unattractive

Weak Knowledge Management

However, the ways people work together means that these staff are not being utilised effectively. Stakeholders reported that the organisation is not good at capturing insights and empowering people to use the knowledge that has been gained in new situations.

Poor Use of Data Insights and Analysis

There has been little in the way of data presented showing the results of the reactive public fundraising activities. Appendix 5 summarises the web statistics for specific TI-S web pages but stakeholders reported that they are not aware of how this data has been reviewed to improve performance. For example the data could have been used to:

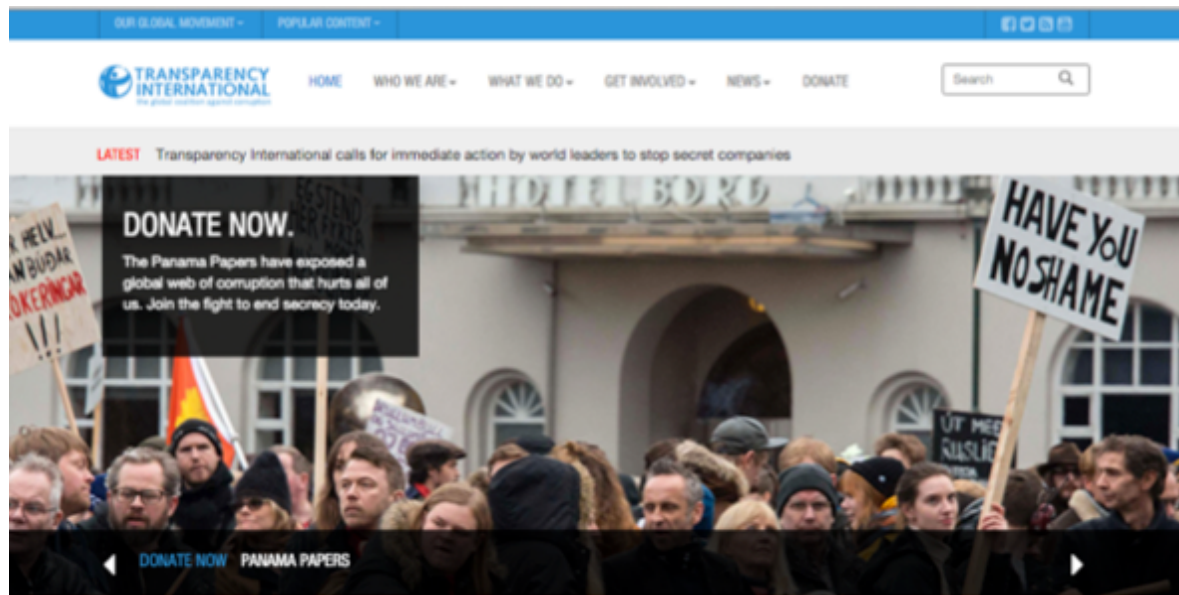
- Improve conversion of donation page visitors
- Improve through traffic from the Home Page to the donation form
- Improve length of visitor stays

Additionally many stakeholders voiced personal preferences about various aspects of the Panama Papers fundraising activities which means that personal opinion was getting conflated as fact. This lack of an evidence-based approach to fundraising makes it extremely difficult to improve fundraising performance in the future.

Pentatonic Marketing was asked to supply some suggestions for improvements that could be made to the TI-S online fundraising activities. These were supplied but not implemented.

9. Appendix 1: Website Public Fundraising Presence

Home Page



Donation Form

OUR GLOBAL MOVEMENT > POPULAR CONTENT > Facebook Twitter LinkedIn

 HOME WHO WE ARE > WHAT WE DO > GET INVOLVED > NEWS > DONATE

You are currently - [Home](#) / [Donate](#)



ENOUGH!
DONATE AND JOIN THE FIGHT TO END SECRECY TODAY.

The Panama Papers have exposed a global web of secrecy and corruption that hurts all of us.

Covert off-shore "companies" enable the wealthy and powerful to keep their fortunes hidden.

This system enables politicians and presidents, bureaucrats and businesses to avoid paying taxes or to stash away stolen funds. It protects drug lords, arms dealers and terrorists. It stops the guilty being brought to justice.

Enough is enough.

We've had enough of the double standards. Enough of the lies. World leaders have the power to end this secrecy. It's time that they did.

It's time to outlaw offshore secret companies. It's time that everyone knew who really owns the companies winning big government contracts. It's time for justice.

Together we can demand a world that is transparent and fair for everyone. Donate and join the fight to end secrecy today.

3 STEPS TO STOP SECRET COMPANIES

HOW TO SUPPORT

You can donate to the global fight against corruption in several ways.

 Your donation will be made securely using SSL-Encryption

SUPPORT OUR WORK IN A PARTICULAR COUNTRY

Choose a Chapter to donate to...

You will be redirected to the website of the Transparency International chapter of your choice to donate directly to them.

CONTACT THE FUNDRAISING TEAM

If you have any questions regarding donating or would simply like to get in touch with us please direct your correspondence to support@transparency.org

If you'd like to read more about our [donations policy](#) then you can do so [here](#)

AMOUNT	YOUR DETAILS	TYPE OF PAYMENT	DONATE
--------	--------------	-----------------	--------

Please choose the amount you wish to donate

Choose gift type

Please select if you'd like make a 'single' or 'regular' donation. More information about making a 'regular donation' and how to manage it can be found [here](#).

Single Regular

Alternatively you can [donate via Bank Transfer](#).

Panama Papers Article

WHISTLEBLOWING - 4 APRIL 2016

3 steps to stop secret companies



[The Panama Papers investigation](#) – an analysis by a network of news organisations led by the International Consortium of Investigative Journalists of 11.5 million leaked documents -- shows just how many rich, famous and politically connected people, from heads of state to crime bosses and business owners, hide their wealth behind the façade of secret companies.

ENOUGH!

**DONATE AND JOIN THE FIGHT
TO END SECRECY TODAY.**



They often do this explicitly to evade taxes and launder money from illicit activity. This can and must be stopped by comprehensive global agreements to end the use of secret companies. The investigations focussed on Mossack Fonseca, a law firm in Panama, a country known globally as a secrecy jurisdiction.

But Panama is not alone. The world is dotted with states and territories that make a speciality of providing services whose purpose is to facilitate ways to hide assets. [Top secrecy jurisdictions](#) include everywhere from British crown dependencies to US states like Delaware and Nevada, and many more in between from Andorra to Vanuatu.

Not all of what they do is illegal but so much of it is that the whole system needs changing.



TRANSPARENCY INTERNATIONAL HAS THREE KEY ASKS:

1. All countries should require much higher levels of transparency around who owns and controls companies registered in their territories.
 - Governments should establish central, registries that publicly disclose beneficial ownership information. This will help law enforcement, journalists, and governments to do their job and help investors and citizens know who is behind the companies they invest in or buy from.

2. Professional enablers that are found to be complicit in corruption must be sanctioned.

- Governments should fully comply with international standards to require professionals in law and accountancy, real estate, as well as company formation agents and bankers to have in place anti-money laundering procedures and report suspicions of money laundering.
- Governments should establish more effective oversight and sanctions for these sectors. Professional bodies should withdraw professional licenses from those implicated in wrongdoing.

3. All countries should require any company bidding for public contracts or purchasing property to disclose on whose behalf they are operating.

- Governments should require any company, whether incorporated domestically or in a foreign jurisdiction to be transparent about who is ultimately in control of the company. This would help to put additional pressure on companies to be more transparent in order to qualify for lucrative government contracts

In May the UK will host a global anti-corruption summit with world leaders. This presents an important opportunity to get global agreement on ending secrecy in the financial system. Now is the time to take decisive actions to close the loopholes that the corrupt use.

The Panama Papers show an array of people and banks using the services of Panamanian law firm Mossack Fonseca to register secret companies.

These include:

- A member of FIFA's ethics committee Juan Pedro Damiani, who had business relationships with three men indicted in the FIFA scandal
- A cellist friend of Russian president Vladimir Putin who shifted more than \$200 million through Panama
- The wife of the prime minister of Iceland
- Two kings, from Morocco and Saudi Arabia
- 500 banks including HSBC, Credit Suisse and Société Générale, who between them set up more than 15,000 corporate entities
- 29 billionaires featured in Forbes Magazine's list of the world's 500 richest people
- Lionel Messi, the world's most famous footballer

Mossack Fonseca denies any wrongdoing. It says "the company is no more culpable than an automobile factory that built a car later used in a robbery".

But such excuses are wearing thin and lack logic. The law firm is more like a company that sells high speed cars with tinted windows and no number plates that then acts surprised when the cars are used by criminals.

Instead of facilitating potentially corrupt acts, all law firms and other professionals should carry out the due diligence that is needed to prevent corruption when they take on clients. While many note that their actions are not illegal, the focus should be on acting with integrity to stop corruption worldwide.



ENOUGH!

**DONATE AND JOIN THE FIGHT
TO END SECRECY TODAY.**



Blog Posts (examples)



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PUBLIC PRESSURE FORCES ICELAND'S PRIME MINISTER TO STEP DOWN OVER PANAMA PAPERS

by Gudrun Johnsen on 6 April 2016 in [Financial Integrity](#), [Politics and government](#), [Private sector](#)



Protesters in Reykjavik, Iceland on 4 April

Iceland's Prime Minister Sigmundur Gunnlaugsson [resigned](#) on Tuesday just one day after thousands of people marched in the streets protesting his use of secret bank accounts facilitated by Mossack Fonseca, a Panamanian law firm which had as clients Gunnlaugsson and his wife.

Iceland was the only country that [jailed top financial executives](#) behind bars in the aftermath of the 2008 financial crisis. This Monday, an estimated ten percent of the population attended [protests](#) around the country, to demand the resignation of their prime minister.


For the past three weeks, Icelandic media have covered a serious conflict of interest and lack of financial disclosure on the part of Gunnlaugsson. With the release of [the Panama Papers](#), this national story hit global headlines.

People, who have suffered through the 2008 financial crisis that all but bankrupted the country and severely dented livelihoods took their anger to the streets. The protests were broadcast live on as many as 75 television stations worldwide. Over 11 per cent of Icelanders also signed an online petition calling for the prime minister's resignation.


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4 APRIL 2016



BLOG

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NEW EU PROPOSAL ON CORPORATE TAX IS TRANSPARENCY ONLY IN NAME

Posted by Alex Johnson
12 Apr 2016

The European Commission's new proposal [1] on corporate tax disclosures fails to deliver meaningful information that would provide real transparency, according to Transparency International EU. Despite last minute concessions following the Panama Papers scandal, only a fraction of multinational companies' tax payments and other finances will be open to scrutiny. Companies will continue to evade accountability for their financial affairs in the world's poorest countries, which have suffered disproportionately from illicit financial outflows [2].

The new proposal falls far short of the Commission's stated commitments to transparency and fails to address public concerns following the Panama Papers leak, according to the group. Transparency International EU is calling on the European Parliament to stand up for corporate accountability and table a proposal for genuine public country-by-country reporting (CBCR).

"The Commission has squandered a golden opportunity to make companies more accountable", said Elena Gaia, Policy Officer on Corporate Transparency at Transparency International EU. "The last minute addition of tax havens smacks of window dressing. Companies will still be able to strike favourable deals with governments in other parts of the world without public scrutiny," added Gaia.

Under the draft legislation, multinationals will only be required to publish information on a country-by-country basis for activities inside the EU and for countries on a yet to be published EU list of tax havens [3]. For the rest of the world EU companies will only have to disclose an aggregate figure.

"It's baffling why the Commission has proposed a cumbersome and contentious process to create a list of tax havens when there is already a simpler solution. Full public country-by-country reporting"

SEARCH

CORPORATE INTEGRITY







INTEGRITY WATCH





A new user-friendly platform to identify politicians' potential conflicts of interest and outside activities

10. Appendix 2: Paid for Social Media Activity


Twitter

Tweet	Start	Spend	Impressions	Link Clicks [?]	Cost per link click [?]	Click rate
Campaign totals	-	\$300.00	708,262	404	\$0.74	0.06%
 Transparency Int'l @anticorruption 10 Apr 2016 Help us make #PanamaPapers and secret companies a thing of the past: transparency.org/donate pic.twitter.com/usrinvl32	10 Apr	\$66.45	230,421	93	\$0.71	0.04%
 Transparency Int'l @anticorruption 10 Apr 2016 #PanamaPapers unveiled truth behind secret companies of rich & powerful. Help us stop this: transparency.org/donate pic.twitter.com/txknA0PGXe	10 Apr	\$117.10	230,365	156	\$0.75	0.07%
 Transparency Int'l @anticorruption 10 Apr 2016 1 week since #PanamaPapers - we need your help to fight secret companies that hurt us all: transparency.org/donate pic.twitter.com/oWTbEDPm4g	10 Apr	\$47.66	138,761	64	\$0.74	0.05%
 Transparency Int'l @anticorruption 10 Apr 2016 #PanamaPapers shows when people come together, we can fight #corruption + corporate secrecy transparency.org/donate pic.twitter.com/Oljcz31n72	10 Apr	\$69.23	108,715	91	\$0.76	0.08%

Facebook

 **Transparency International** Sponsored · 

Panama Papers unveiled the truth behind secret companies of the rich and powerful, including politicians. Together we can put an end to corporate secrecy!



Donate and join the fight to end secrecy today!
www.transparency.org
 Not affiliated with Facebook

[Donate Now](#)

vodafone UK 07:09 100% 

 
 you don't need money to fight against corruption
 Tuesday at 10:56 · Edited · Like · Reply

 
 Including politicians, or Specially politicians??
 Monday at 17:03 · Edited · Like · Reply

11. Appendix 3: Competitors' Social Media Activity

38 Degrees
8 April at 13:45 · 

Well, this is embarrassing...
Sign the petition telling David Cameron to close the tax havens:
<http://bit.ly/22hBc38>



1.9M Views

 Like  Comment  Share 

38 DEGREES
people. power. change.

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Shut down British owned tax havens

To Rt Hon David Cameron

Petition text

Please shut down British owned tax havens like the British Virgin Islands. You've promised to crack down on tax dodging for years - now's the time to get stuck in. The mega-rich shouldn't be allowed to get away with paying less than their fair share of tax.

Why is this important?

The world's rich and powerful are playing by different rules - squirreling away their wealth to dodge tax. The global "Panama papers" scandal shows how many world leaders and powerful people are using tax havens to dodge tax and launder money.

A large number of the biggest tax havens are British crown dependencies and British overseas territories. That means the British government has the power to shut these tax havens down.

Please do the right thing and close down all tax havens under British control.

You're signing this as **Chris Washington-Sare**
Not you? [Click here](#)

Your postcode:

[Sign the petition](#)

Your personal information will be kept private and held securely. By submitting information you are agreeing to 38 Degrees keeping you informed about campaigns and agree to the use of cookies in accordance with our [privacy policy](#)

199,173
signatures

4 April at 15:51 · London · 🌐

#PanamaPapers Take action with Oxfam



Ask your MP to help end the era of tax havens


This May, David Cameron is hosting a global Anti Corruption Summit in London. It's the perfect moment to get tough on tax dodging -- and your MP can help.

ACT.OXFAM.ORG

2

Like Comment Share

+ SumOfUs Fighting for people over profits



David Cameron

David Cameron: fully disclose your tax affairs!

Sign the petition

TO: David Cameron
Fully disclose your tax affairs. Publish your tax returns in full, along with a list of any companies you or your family own or part-own.

51,584 signatures
23,416 SIGNATURES UNTIL 75K

Full Name

Email Address

Postal/ZIP Code

United Kingdom

SIGN THE PETITION

SumOfUs will protect your privacy, and keep you updated about this and similar campaigns.

Just what is David Cameron hiding from you and me?

He's refusing to say **whether his family still has money invested in secret funds** set up by his father, claiming it "is a private matter".

But Cameron says he wants to end tax secrecy and crack down on corporations using offshore schemes to dodge taxes. And just next month, he is hosting a major summit on the issue. **If he won't open up about his own offshore corporate tax affairs, how can we trust him to do what's necessary?**

Tell David Cameron to fully disclose his tax affairs -- including the tax setup of any companies he or his family own or part-own.

Ian Cameron ran an offshore fund that **avoided paying a penny of tax in Britain for 30 years**. That fund helped him amass a legacy of £2.74 million, some of which was left to David Cameron.

Now questions have been raised over whether Ian Cameron's company was really controlled in the UK during the time it failed to pay taxes here -- which would be in breach of UK laws -- and whether the Cameron family's money is still in those funds.

Your guide to The Panama Papers



The Panama Papers: An Introduction

Thank you for joining us on this guided tour of the **Panama Papers**, an investigation into the rogue offshore finance industry based on one of the world's biggest data leaks. The project, in collaboration with more than 100 media organizations, has already had widespread impact - [political fallout](#), [investigations](#) and a [police raid](#). This tour aims take you behind the scenes of this secretive world, with six emails over the next two weeks. So what do the 11.5 million papers reveal? There are **blacklisted companies**, **criminals**, and **tax dodgers**. Behind the invoices, email chains and paper trails are [stories with real victims](#).



Meet Mossack Fonseca, the firm at the center of the investigation

Your guide to The Panama Papers



How does offshore finance work?

A Swiss bank account or an offshore company registered in Belize? Declare your overseas wealth or try to anonymize your holdings? The offshore world works by providing **layers of secrecy** – many legal – that allow users to hide assets from authorities. Discover some of the methods people use to stash their money away – and how they might get caught out. Start your own offshore adventure with the [Stairway to Tax Heaven game](#).



The enablers – bankers and lawyers

How some of the world's big banks have teamed up with law firms to help the wealthy hide assets.

Your guide to The Panama Papers



Who uses the offshore world?

One of the most noticeable things about the 11.5 million files that make up the Panama Papers is the **diversity of clients** and customers using offshore accounts: there are ordinary citizens and business people; there are arms dealers, drug traffickers, fraudsters, tax evaders and other criminals; and then there are the world leaders, **politicians and elected officials and their families**. So who are the **power players** using offshore finance? [Explore the offshore connections](#) of 12 current and former world leaders, and dozens of politicians and their close associates.

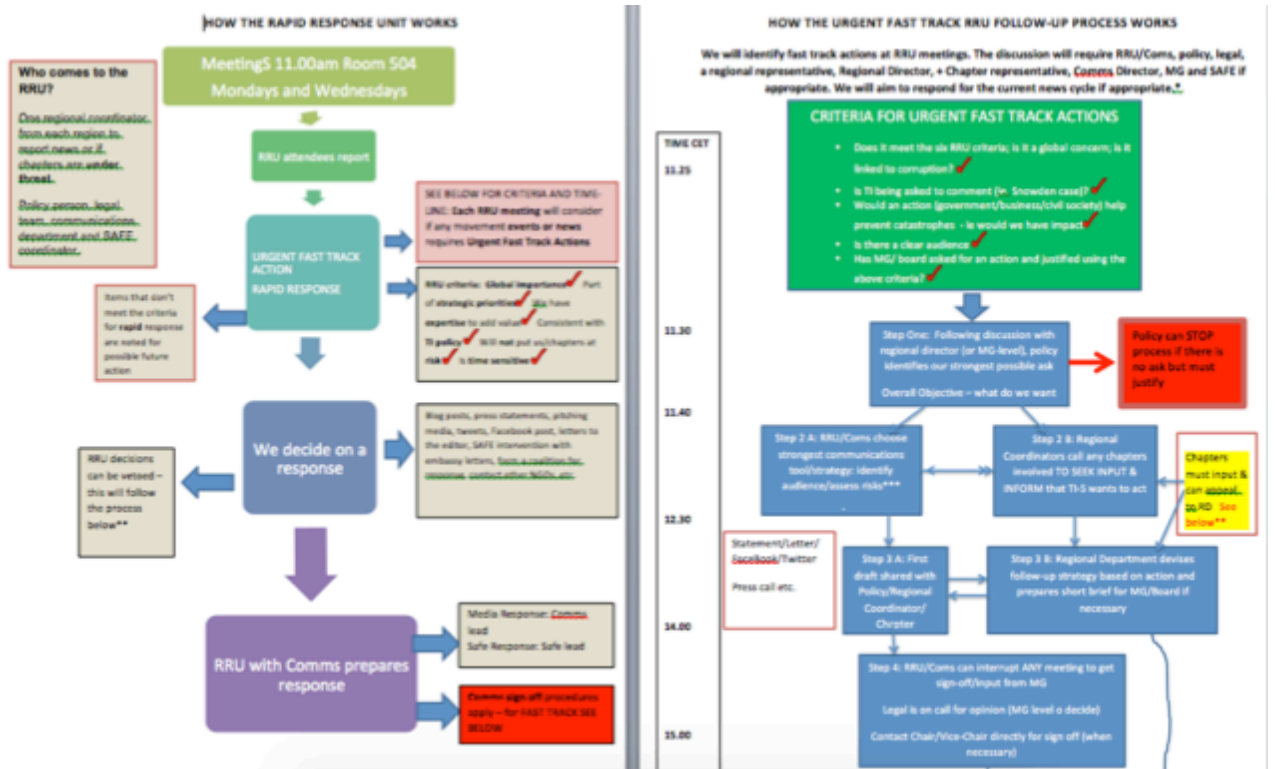
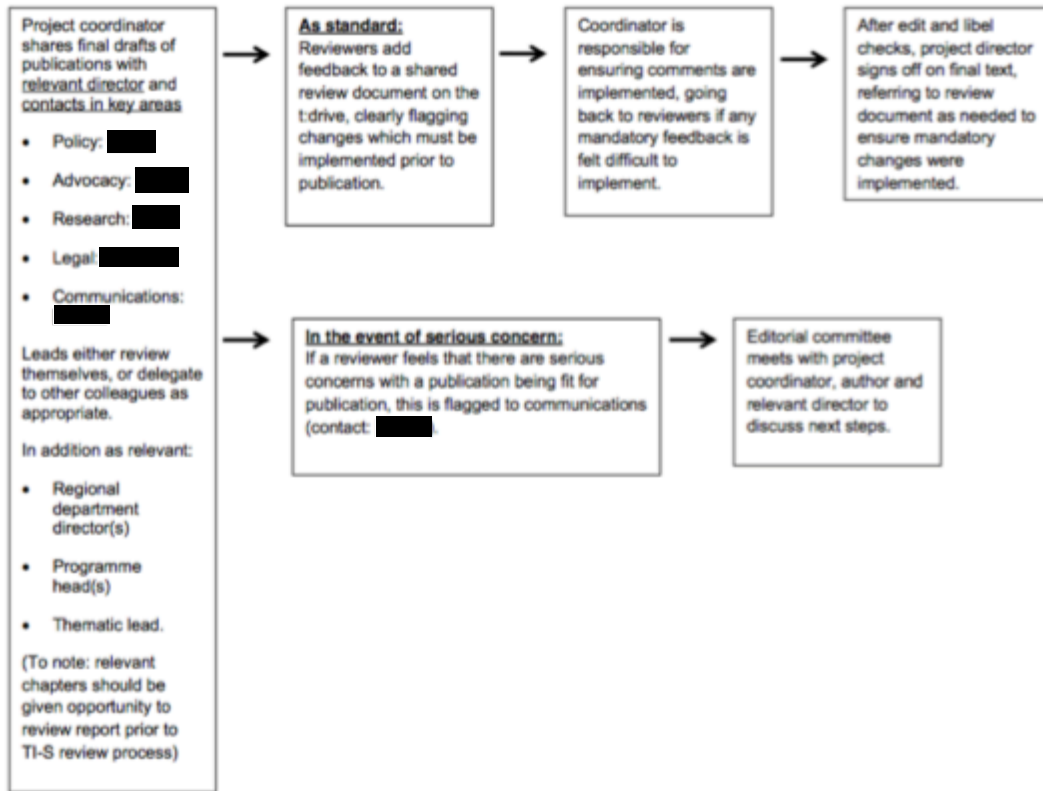


Offshore money network tied to Putin

As much as \$2 billion has been secretly shuffled through banks and shadow companies linked to Putin's allies.

12. Appendix 4: Existing Processes

Proposed review process



13. Appendix 5: Web statistics

	Users	Page Views	Av Session Duration	Bounce Rate
3-10 April				
Home Page	100,760	299,427	2:17 mins	57.24%
Donate Form	no data	920	1:37 mins	76.29%
News Page	no data	3,406	3:02 mins	87.87%
10-17 April				
Home Page	77,187	244,329	2:32 mins	56.58%
Donate Form	no data	1,625	1:49 mins	87.50%
News Page	no data	1,655	4:41 mins	81.96%
17 - 24 April				
Home Page	78,165	237,759	2:29 mins	58.29%
Donate Form	no data	3,899	3:16 mins	91.26%
News Page	no data	564	4:33 mins	84.59%