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Scrutiny, Not Control

Strengthening Accountability for Human Rights and Humanitarian NGO Claims and Evidence

The Policy Problem

Human rights occupy a special place in Germany's constitutional order and foreign policy, and in the founding values of the European Union. Human rights and humanitarian organizations help give effect to those commitments and hold an influential place in policymaking. Their research and public claims shape how repression and human rights violations are understood, whose experiences receive attention, and how governments respond through policy and aid.

But there is an important accountability gap.

Germany has mechanisms for scrutinizing NGOs' finances, charitable status, governance and lobbying, and the EU applies transparency and funding controls. Neither has a comparable system for independently assessing the reliability of human rights and humanitarian research and public claims.

Institutional authority is not evidentiary reliability. Access restrictions, funding, institutional interests and political pressures can shape what NGOs investigate and report. Even respected organizations can publish findings based on incomplete evidence or that fall below their own standards. As recent controversies illustrate, failures may remain undisclosed until external exposure forces acknowledgment, raising questions about the adequacy and enforcement of internal standards. Staff who raise concerns about research integrity or public claims are in a grey zone: whistleblowing laws focus on legal breaches, and no dedicated independent mechanism assesses such concerns.[1]

Internal safeguards do not always work. In 2022, Amnesty International published allegations concerning Ukrainian forces that an independent legal panel later described as "ambiguous, imprecise and in some respects legally questionable," despite internal reservations. The panel's findings emerged through a leak; the original statement was not withdrawn. In 2026, Amnesty International UK, a separate national section, withdrew a briefing following public criticism, acknowledging that it had bypassed established review procedures and fallen "significantly short" of its research, evidence and editorial standards.

Four years apart, on different subjects and in different parts of the movement, both failures were addressed only after they became public. They are the cases we know about. Without independent scrutiny, there is no way to know how many flawed claims go unexposed yet still shape policy.[2]

The issue is not whether NGOs should be trusted or distrusted. It is whether institutions exercising substantial public influence should remain the principal judges of the reliability of their own work.

Why Legislators Should Act

Germany and the EU encounter NGO research and public claims in two capacities. As funders, they may support research, documentation and advocacy. Yet financial audits assess how public money is spent, not whether the resulting claims are adequately sourced, verified or qualified. Financial accountability is no substitute for evidentiary accountability.

As users, German and European institutions may rely on NGO findings whether or not they funded the work. Claims can pass from NGO reports into media coverage, international reports, parliamentary

[1] EU Whistleblower Directive (EU) 2019/1937, Arts. 1, 2 and 5(1); German *Hinweisgeberschutzgesetz* (2023), §2.

[2] Sources: Amnesty International, *Report of the Legal Review Panel on the Amnesty International Press Release Concerning Ukrainian Fighting Tactics of 4 August 2022* (ORG 60/6731/2023), https://www.amnesty.org/en/documents/org60/6731/2023/en/; Amnesty International, *Ukraine Organizational Report: Key Findings and Learnings Relating to the August 4 Press Release on Ukraine* (ORG 60/6795/2023), https://www.amnesty.org/en/documents/org60/6795/2023/en/; Peter Beaumont, "Leaked Amnesty Review Finds Own Ukraine Report 'Legally Questionable'," *The Guardian*, 28 April 2023; Amnesty International UK, "An Apology for A Growing Threat briefing" (31 July 2026).

debates and official assessments, acquiring the appearance of independent corroboration through repetition and institutional endorsement, even when successive accounts rely on the same evidence.

Roles also overlap: many NGOs implement the programs their findings inform. Civil society organizations received about US$ 2 billion of Germany's bilateral aid in 2024.[3] Where NGOs assess programs in which they have an operational or financial stake, their findings may be valuable but should not automatically be treated as independent evaluations.

Five Recommendations

1 **Examine the accountability gap.** The Bundestag and relevant European Parliament committees should review how NGO research and public claims are assessed, distinguishing financial oversight from scrutiny of evidence and methodology, and hold a parliamentary hearing.

2 **Establish standards for institutional reliance.** Federal ministries and relevant EU institutions should adopt principles for using NGO claims that distinguish testimony, allegations, corroborated findings and an organization's recommendations, and require attribution, disclosure of limitations, attention to contrary evidence and checks against circular sourcing.

3 **Strengthen safeguards in publicly funded research.** Where public grants support NGO research, documentation or advocacy, grant conditions should include proportionate safeguards for sourcing, verification, corrections and research records. These concern professional integrity, not conclusions, and are not conditions on aid to beneficiaries.

4 **Establish independent reporting channels.** Germany and the EU should support independent, confidential channels through which staff, local partners and affected communities can safely report concerns about research, evidence and public claims, not only misconduct and breaches of law, with protection against retaliation.

5 **Pilot independent professional review.** Germany and the EU should support an independently governed pilot assessing publicly available NGO research and claims, and underlying practices, against viewpoint-neutral standards, regardless of public funding or organizational participation. EiGHT's Evidence & Integrity Framework offers one model, combining public standards, quality-control disclosures, independent verification and a public accountability record.

Independence Must Be Protected

The solution is not government regulation of NGO conclusions. There should be no ideological tests, retaliation for criticism, compelled disclosure endangering sources or politically selective scrutiny.

Independent review must be protected from government, funders and the organizations assessed. It should examine whether evidence was responsibly gathered, tested and presented — not whether reviewers agree with an organization's position. Public NGO research and claims should be open to independent, risk-based assessment, whether or not the organization consents. Reviewers should separate what public evidence establishes from what would require confidential records.

> The principle is straightforward: governments should not control what NGOs say. But they must establish the standards they themselves will apply before treating NGO claims as established fact.

About EiGHT: EiGHT is a Geneva-based, insider-led initiative strengthening accountability for NGO research, public claims and professional practices. · info@eightrights.org · www.eightrights.org

[3] Source: OECD, Development Co-operation Profiles: Germany (2026), 2024 gross bilateral ODA to civil society organizations.