CBM Interim Report 2016
Accountable Now

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Introduction

We are CBM
CBM is a Christian international development organisation, committed to improving the quality of life of persons with disabilities in the poorest communities of the world irrespective of race, gender or religious belief. Based on its core values and over 100 years of professional expertise, CBM addresses poverty both as a cause and as a consequence of disability, and works in partnership with local and national civil society organisations to create an inclusive society for all.
CBM is a federation composed of 11 national member associations based in Australia, Canada, Germany, Ireland, Italy, Kenya, New Zealand, South Africa, Switzerland, the United Kingdom, and the United States and an international office with a network of regional and country offices that work closely with our partners in Africa, Asia and Latin America.

Our approach
Disability-Inclusive Development is the framework of all our initiatives and the key theme which drives our activities and the impact of our work. We believe that this is the most effective way to bring positive change to the lives of persons with disabilities living in poverty and their communities. Through our Disability-Inclusive Development approach, we address the barriers that hinder access and participation and actively seek to ensure the full participation of persons with disabilities as empowered self-advocates in all development and emergency response processes.

Our work
With a global network of partners, CBM seeks to build and promote an inclusive world in which all persons with disabilities enjoy their human rights and achieve their full potential. Our work includes:
- supporting comprehensive health care systems and services in eye health, ear and hearing care, community mental health and physical rehabilitation.
- ensuring inclusive education for all, reaching the most marginalised.
- building inclusive, resilient communities through Community Based Inclusive Development.
- implementing inclusive emergency response and disaster risk reduction.
- strengthening international advocacy and alliances to realise the human rights of persons with disabilities and the promotion of Disability-Inclusive Development.

The CBM Federation Strategy 2021 was approved in 2016, and with it, the redesign of our organisation. This marked a key turning point for CBM. The redesign, starting with the implementation of a new governance model, has brought accountability again to the forefront of our work. It has already provided better transparency on decision-making processes and responsibilities. The aim of our redesign is to become more agile as an organisation so that we can bring effective, transformative change to the lives and communities of persons with disability living in poverty. One driver of this change is to further improve our accountability towards these persons and our donors.

The Federation Strategy lays out a major transformation process which impacts all aspects of our organisation. This process involves implementing a new operating model, reviewing key processes internally as well as further developing our organisational culture. Within the new operating model, we aim to bring our donors and partners closer together and reduce complexities that exist by simplifying processes.

In the course of our transformation process we are currently re-working the subject matter of 'environmental sustainability' to include it holistically into CBM's programme work. In order to incorporate these "green" initiatives accurately into our do-no-harm approach and to provide a solid foundation for this critical component of thorough development practice - with buy-in from all relevant stakeholders - the calculation of the carbon footprint report for 2016 has been put on hold. This will allow us to concentrate our resources into sound development of the approaches. As a key part of this process and CBM's commitment to 'environmental sustainability', a roadmap is being developed during 2017. At an appropriate point, the carbon footprint reporting will be resumed, but as an integrated component of CBM's approach, rather than as a stand-alone activity.

We believe that these changes will have positive, lasting effects on the relationship with our partners and enable us to better serve persons with disabilities living in poverty.

Improving our accountability reporting is needed as we undergo transformation. In this interim report, we have tried to address questions from the review panel with utmost clarity and are happy to provide additional information as requested. We continue to rely on critical feedback from the review panel, our partners, supporters, staff, and the beneficiaries of our work to help us improve our accountability.

We welcome the new global standard and will adapt our reporting to this methodology in the next complete report.

Warm regards,

Dr. Rainer Brockhaus
Chair of the International Leadership Team

Providing multiple sources for evidence

The Independent Review Panel hopes that CBM will be able to provide more general evidence and input from partners (e.g. that partnership systems work well in practice or that staff uses CBM's anti-corruption policy) to demonstrate procedures actually work - as mentioned in previous feedback letters.

Actions taken
More evidence shall be provided in the future such as the submission of case studies and other feedback. However, more clarity from the Review Panel is needed on what kind of evidence is requested. The systems to strengthen partnerships are in place and in use ensuring that standards are implemented and well in practice, this in particular through:

- linking partner assessments with relevant capacity building measures
- participatory and joint program planning
- partnership contracts/Memorandum of Understanding
- regular monitoring via our regional and country offices
- partnership and planning meetings with our program partners

In addition, CBM plans from 2018 to introduce an independent survey to gather partner feedback on CBM, such as that facilitated by Keystone Accountability.

Collecting and analysing feedback and complaints (NGO2)

CBM has an external programme feedback system in place since 2014. The feedback and complaints handling position paper is available on their website. A Feedback Manager is responsible to follow up on feedback received and to forward it to CBM's respective units. The whole process is visually demonstrated in the report's Appendix B. However, it seems very low and almost alarming to have received only two cases of complaints or feedback in 2015. It would be interesting to know CBM's internal definition of a "complaint" in this regard. Systematically generating, aggregating and analysing feedback to detect trends of where things go wrong and to address them quickly is at the heart of accountability!

Actions taken
CBM's definition and parameters of a "complaint":

Definition feedback/complaint:

Feedback is an opinion about CBM's programme work or service rendered by CBM. The nature of this opinion may be in the positive (a compliment), neutral such as a suggestion for improvement, or it may be in the negative (a complaint).

Parameters: …"Feedback on CBM's Programme work could, for example, include a concern regarding the quality of programme delivery, poor compliance with our policies and procedures, CBM's lack of action, or concern about the behaviour of our staff, volunteers or contractors."

It is recognised that this is a long term process requiring concerted efforts to demonstrate to partners CBM's commitment to receiving and responding to complaints. It is anticipated that the proposed Keystone survey with partners will help to reinforce this commitment.

In 2015/2016, we have further developed our feedback and complaint mechanisms:

At the end of 2015, a letter informing about CBM's feedback service for external stakeholders containing a link to our website and the respective screenshot were sent to all partners along with their budgetary information for 2016 in order to ensure that it would find their attention. Furthermore, the letter contained the following sentence: "CBM values your feedback in order to improve our programme work and we also welcome negative feedback to alert us about problems." As it was signed by CBM's president, it was clearly expressed that CBM wishes to receive complaints, too.

Since a regional feedback system was piloted for the South Asia Region (SAR) CBM's respective Regional Director sent an additional letter informing partner organisations about the Indian feedback system.

When we found that the pilot feedback service set up for India had not found sufficient attention in 2015, we developed an action plan together with the regional programme director. The action plan included more awareness of programme staff and their communication about the feedback mechanism to partners during visits/meetings.

As a result of the action taken, the following cases could be registered in 2016:

Central IO feedback service: **7 cases registered**

Thereof: 6 complaints of which 3 also contained positive feedback, 1 positive feedback

Pilot SAR feedback service: **9 cases registered**

Thereof: 3 complaints, 6 positive comments

SO3	**Anti-corruption practices** *Addressed*
	CBM has very solid risk assessment and anti-corruption mechanisms in place: Internal audit field level checks, internal audit red flag reporting, whistle-blower system, Standing Operating Procedure (SOP) for critical incident reporting, and trainings. The Panel looks forward to CBM reaching their target of training 500 employees by mid-2017 on prevention of corruption and fraud (e-learning).
	The 2014 report stated that a policy to prevent corruption and fraud in all activities and operations was approved and implemented in the beginning of that year. The Panel would still appreciate evidence whether this policy is well known and used by staff.

Action taken:
The e-learning "Preventing Corruption and Fraud" refers directly to the policy and to the whistle-blower system. Between April 2015 and March 2017, a total of 101 respondents out of 298 invited learners completed the training. In April 2017, the Management Meeting decided to prolong the period of the e-learning until December 2017 to be able to reach the total of 500 learners and to evaluate how to incorporate a standard training in the annual training plan.

There is a clear relation of dissemination of CBM's policy on preventing corruption and fraud and the respective e-learning: In 2016, the number of

whistle-blower reports increased considerably (from 3 in 2015 to 8 reports in 2016) after the training was launched.

Since July 2016, we are monitoring the total number of visits on our whistle-blower introduction page at cbm.org. Leading up to 31 December 2016, there were a total number of 1,453 hits.

In September 2016, the whistle-blower system and CBM's policy Preventing Corruption and Fraud were introduced during a global staff meeting. Slides of the presentation are available to all CBM staff as they are on SharePoint, our intranet.

A presentation to introduce internal audit topics included the policy Preventing Corruption and Fraud, the whistle-blower system and the red flag reporting system. It is mandatory for every new member of staff in Bensheim as well as for expats working in the field. In 2016, 20 staff members were trained during their orientation by internal audit.

SO4	**Actions taken in response of corruption incidents** *Fully addressed*
	The answer gives a comprehensive overview of 53 critical incidents occurred in 2015 (detected through the red flag system or reported through the whistle-blower system). Are such incidents published anywhere else than in this report?

Action taken:

Whistle-blower Reports	2014	2015	2016
Reported cases	1	3	8
thereof solved	1	2	6
thereof open	0	1	1
thereof not valid	0	0	1

The whistle-blower report as well as the critical incidents are reported monthly to the Executive Management and published on SharePoint with access limited to a designated group of finance and programme managers within the CBM Federation.

So far the reports are for internal use only and are classified confidential as they contain the analysis and details of the partner organisation as well as details of organisational weaknesses within the global CBM structure.

Global talent management (LA12)

This area for improvement was highlighted by the Panel already in 2014. Questions follow.

Actions taken
Have the redesigned and more accessible performance appraisal forms led to a higher implementation rate? 71% of completed appraisals in 2015 still seem comparably low. How have these appraisals improved the coherence and effectiveness of staff in achieving strategic goals?

The implementation rate for performance appraisals has gone up from 64 percent in 2014 to 71 % in 2015. So, we can register a positive trend (+7%). Whether this was due to the revised performance appraisal forms cannot be

proven. The forms were only piloted in 2015. In 2016 they were applied throughout the organisation, with further adjustments to the form made at the end of the pilot phase. The implementation rate for 2016 in CBM International is 83 %.

A better achievement of strategic goals through the new appraisal form cannot be stated or proven. The forms were introduced in between two strategies and during a period of major organisational change. The current Federation Strategy 2021 was approved in October 2016, so the new strategic goals did not yet drive the performance or objective setting process in the reporting year.

How has streamlining the performance appraisal process and basing it firmly on the Competency Model developed?

Basing the performance appraisal process on the competency framework was one step among many to introduce and establish the competency framework within CBM. Staff members were trained and the organisation has a common understanding of expected behaviours. The selected criteria for performance appraisal seem to be accepted among staff and managers. With a competency dictionary giving good guidance misunderstandings and questions to HR on the meaning of selected criteria have decreased.

As asked by the Panel previously: How does the introduction of the Individual Development Dialogue tool differ from performance appraisals and how are they linked?

The Individual Development Dialogue (IDD) is a one to two hour discussion between an employee and a higher manager in the organisation (not the direct manager of the employee to improve objectivity). The aim is to identify long(er)-term development interests and development needs of an employee and match it with those of the organisation. The result of the discussion is an Individual Development Plan (IDP). The IDD is not an annual meeting, in contrast to the performance appraisal. The performance appraisal is always carried out against a generic set of competencies across all functions whereas the IDD tries to identify 1) development interests, geographical mobility and possible positions (management or expert roles), 2) required competencies and competency gaps. Measures to close the competency gaps are agreed in the IDP.

Performance appraisal and Individual Development Dialogue are linked. An IDP only makes sense if the performance appraisal in the current role has been above average for three consecutive years.

Ethical fundraising and communications (PR6)

Member Associations adhere to the ethical and fundraising codes in their respective countries. As already requested for the 2013 report, a link to the mentioned policy on the ethical and respectful use of pictures would be welcome in the next report.

The report says that complaints are "usually" received and responded to by the local Member Associations and serious complaints are addressed by the International President. More concrete information will be welcome for the next report.

NGO5 mentions that a number of disability activists from the Middle East complained about a CBM fundraising campaign, as they felt it did not portray persons with disabilities in the right way (page 36). It is furthermore explained what CBM did to resolve this issue. How many in total and what other kind of

complaints did CBM receive with regard to their fundraising and communications activities?

Actions taken

Fundraising is mostly conducted by CBM's Member Associations. Each of our Member Associations adheres to the ethical and fundraising codes of their respective countries. Some examples:

CBM Australia is a member of two peak bodies that involve adherence to ethical fundraising codes

- Australian Council for International Development Code of Conduct
  https://acfid.asn.au/code-of-conduct
- Fundraising Institute of Australia Principles & Standards of Fundraising Practice
  https://www.fia.org.au/pages/principles-standards-of-fundraising-practice.html

CBM Germany

- is approved by DZI Deutsches Institut für soziale Fragen
  http://www.dzi.de/spenderberatung/datenbanksuchmaske/suchergebnisse/1/?typ=alle&keyword=Christoffel&bereiche=alle&laender=alle&sitz=alle
- is member of the Deutscher Fundraisingverband and signed the ethical standards with this membership
  http://fundraisingverband.de/verband/ethische-grundsaetze/ethikregeln/ethikregeln-organisationen.html

CBM Italy is member of Istituto Italiano della Donazione, that certifies ethical standards and efficient and effective use of funds
http://www.istitutoitalianodonazione.it

CBM Ireland

- adheres to the Statement of Guiding Principles for Fundraising - Charities Institute Ireland
  http://www.charitiesinstituteireland.ie/principles-for-fundraising
  subscribes to the Dochas Code of Conduct on Images and Messages
  http://www.dochas.ie/images-and-messages

CBM South Africa

- subscribes to the Southern African Institute of Fundraising's Code of Ethics
  http://www.saifundraising.org.za/index.php/ethics/saif-code-of-professional-ethics
  is an associate of the Association of Fundraising Professionals
  https://www.afpnet.org/Ethics/EnforcementDetail.cfm?ItemNumber=3261

CBM UK

- adheres to the Institute of Fundraising Code of Practice
  http://www.institute-of-fundraising.org.uk/code-of-fundraising-practice/
- is registered with the Fundraising Regulator
  http://www.institute-of-fundraising.org.uk/code-of-fundraising-practice/
- works within the CBM UK Ethical Fundraising Policy and has a Vulnerable Supporters Policy

The CBM Federation has a policy on the ethical and respectful use of pictures. Permission is requested and documented through consent forms, personal data is protected and not-disclosed. Use of pictures is regularly monitored. This is reflected in our Child Safeguarding Policy, aimed at collecting and communicating stories of need and impact while keeping children safe. CBM's

Child Safeguarding Policy includes child safe interviewing, photography and communications guidelines.

CBM requires that all staff and representatives (partners, contractors, consultants, visitors, goodwill ambassadors…) understand, sign, and adhere to its child safeguarding expectations, in the poor countries as well as in the countries where Member Associations are based (http://www.cbm.org/Child-Safeguarding-246770.php).

CBM is a member of Keeping Children Safe and ISPCAN, the International Society for the Prevention of Child Abuse and Neglect.

Complaints are received and responded to by the local Member Associations. If a complaint is sent to contact@cbm.org, it is forwarded to the relevant Member Association for follow up.

Some Member Associations have a complaints procedure in place. Here are some examples:

CBM Australia
https://www.cbm.org.au/content/contact/complaints#.WR02PGe1uM8)

CBM UK
https://www.cbmuk.org.uk/quick-links/complaints/

CBM Ireland
http://www.cbm.ie/Fundraising-Feedback-Complaints-Procedure-445589.php