

Dear Caroline Harper,

On 15th November 2012 we, as the Independent Review Panel, met to discuss the reports submitted by the reporting deadline of 1st October 2012, and we are now writing to you to give you feedback on your report. First of all we would like to thank you for your participation in this exercise and to recognise the commitment to accountability that this demonstrates.

Our approach to assessing the reports which we have received has been to focus on three dimensions in particular: What evidence is there of **institutional commitment** to greater accountability and to using the reporting process to advance it? How **complete** is the report in relation to the guidelines used? How strong is the **evidence** given for the self-assessment that each organisation has conducted? Please find more information on our approach in the annex.

Since we first started assessing the reports we have noticed a **marked improvement in quality** and an improved commitment to accountability. In this round we have reviewed some reports of very good quality. However we have highlighted some common **areas for improvement**. These tend to be in the section on Programme Effectiveness, in particular the indicators related to having a complaints handling mechanism in place (indicator NGO2) and diversity and ethnicity (indicator NGO4). The indicators on training in anti-corruption policies (indicator SO3) and on financial information (indicator NGO8) are also areas for improvement.

- With regard to the **complaints handling mechanism** (indicator NGO2), we would like to remind Members that it is now a mandatory requirement for Charter Members to have such a mechanism in place. This is at the core of good accountability. Such a mechanism should be for external and internal complaints, outline a clear process, including a timeframe for resolution, and be easily accessible. Members should communicate their membership on their website, by uploading the Charter logo, and inserting a link to the Charter text alongside their complaint handling mechanism. The “UN protect, respect, remedy framework” highlights good effectiveness criteria for complaints handling mechanisms (paragraph 31 “Effectiveness criteria for non-judicial grievance mechanisms”):
http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf.
- Regarding **diversity and ethnicity** (indicator NGO4), we would like to encourage Members to use the guidelines “Make Development Inclusive – How to include the perspectives of persons with disabilities in the project cycle management” developed by CBM available here: <http://www.make-development-inclusive.org/toolsen/pcm2.pdf>
- With regard to the generally weak reporting on **anti-corruption policies** (indicator SO3), we would like to encourage Members to use the Anti-Bribery Checklist and Anti-Bribery Principles and Guidance for NGOs produced by Transparency International available under the following web-links:
http://www.transparency.org.uk/attachments/046_NGO_Anti-bribery_Principles_and_Guidance.pdf and <http://www.transparency-se.org/TI-ABC-20-point-anti-bribery-checklist.pdf> In case of specific queries you may also contact Stan Cutzach at Transparency International at scutzach@transparency.org
- We feel that the **financial information** (indicator NGO8) could be better presented in order to allow for greater transparency. Members are encouraged to look at the Good Practice document to see how others present this information.

- In many reports Members just noted that they have the relevant policies in place but we feel that **more examples** of the policies in practice would be useful. Only when it is supported by evidence does the policy come to life and its usefulness can then be assessed. Members are encouraged to give selective examples where relevant, and to give evidence from evaluations where available.
- We value **succinctness and accessibility**. In some reports access to relevant information is made difficult by a lot of immaterial information being given at the same time. Please try and include only essential information.

We understand that it is a challenge for global organisations to report on many national entities, and would encourage them to provide in their report an explanation as to how their **global accountability standards** are upheld at a national level and, if they are not, how they tackle this issue.

We welcome it when organisations make commitments for the future and identify areas for improvement. As an example, we would like to congratulate Oxfam GB for the table included at the beginning of their report showing their **accountability objectives** and the progress made so far. Individual development plans will help push organisational development towards improved accountability in a more systematic way.

To ensure a greater link between the **Charter commitments** and GRI reporting (focussing on transparency) we would like to emphasise our support for the Charter Board decision that all future reports should have a clear link between the Charter principles and the reported actions. We would like to praise Sightsavers for doing so in their first report.

Please note that as a Panel we feel that part of our role is to encourage organisational improvement. To that end we are enclosing, for your information, some examples of what we believe to be **Good Practice** in responding to some individual indicators, based on the GRI framework. This document consists of examples from all reports reviewed thus far. We would like to encourage you to look at this document as we feel this will be a good learning exercise for all Members to learn from each other.

Organisation-specific feedback to Sightsavers

The report is good in particular for a first report. It is **comprehensive**, well articulated, and gives a very good sense about what your organisation does. The level of **evidence** is good and the report includes good examples of the involvement of beneficiaries and achievement of programme effectiveness. It is positive that the opening statement shows good **institutional commitment** to accountability and for improvement.

Your organisation has made the commitment to provide more information on gender and diversity (indicator NGO4) and on the composition of governing body (indicator LA10); we therefore look forward to reading more about this in your next report. The information on your complaints handling mechanism for external complaints could be more complete (indicator NGO2).

We see your answers on the following components as **Good Practice** for other organisations (see “Good practice on GRI Reporting IV” attached to this letter):

- **1.1: Statement from the most senior decision-maker of the organization about the relevance of sustainability to the organization and its strategy**
The assessment of the past year, and the priorities for next year are well described.
- **2.2: Primary activities. Indicate how these activities relate to the organization’s mission and primary strategic goal**

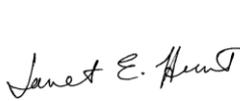
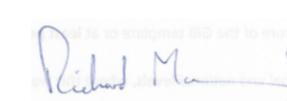
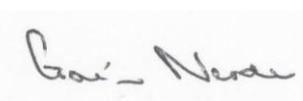
Your organisation's primary activities are clearly described and linked to the overall vision and mission. The 'SIM (Strategy, Implementation and Monitoring) card' is useful. However this section could be more succinct.

- **4.1: Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight**
The fact that your organisation has a Remuneration committee and an induction for its Board is very positive.
- **NGO5: Processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns**
The answer is detailed and good examples of corrective actions taken are provided.
- **NGO6: Processes to take into account and coordinate with the activities of other actors**
The answer is detailed and provides a good explanation as to how your organisation arrives at the bigger picture and where its contribution is the most useful.
- **Charter Principles**
It is positive that your organisation included a table showing where the Charter Principles are referred to in the report.

Our intention is that this letter, and any response that you may wish to provide, should be made publicly available on the Charter website, along with your organisation's report. You can find the reports that were previously reviewed on the Charter website under the section Charter Members/Member Reports. However, should there be errors of fact in the feedback above or in the more detailed note below on conformity with the reporting framework, we would of course wish to correct these before publication.

Should you have any comments we would appreciate a response by 15 January 2013.

Yours sincerely,

				
Janet Hunt	Wambui Kimathi	Richard Manning	Gavin Neath	Tony Tujan

Annex 1 – The Independent Review Panel’s approach to assessing reports

On **completeness**, we acknowledge the demanding nature of many GRI requirements and recognise that not all of them are as material as others. In particular for smaller organisations, some requirements may be overly demanding. Nevertheless they give good guidance and we have attached a note that goes through the shortfalls against the reporting template in detail. In addition we have highlighted areas where we felt, in particular, that your organisation could improve as well as other areas which we considered as strengths in your report.

On **evidence**, we looked in particular for references not only to relevant policy documents, but also to examples where the self-assessment was supported by specific action (for example, drawn from operational activities, whether successful or unsuccessful). It is important for us to see that the accountability commitments that you made when signing the Charter, lead to informed corrective action and ultimately improve the quality of your work.

On **institutional commitment**, we looked for evidence of top-level ownership of the report (for example in the opening statement signed by the Chief Executive) backed by examples in the report; evidence of using the report as a means of identifying areas of relative strengths and weaknesses in the organisation (as opposed to a box-ticking exercise); and evidence of a systematic concern with accountability, including recognition of areas for further work. We encourage organisations to highlight the corrective actions they take, and appreciate when they are open about their failures and make clear commitments for the future. We would hope that progress in such areas would be highlighted in future reports.

2nd Review Round 2012 Note on Accountability Report

Organisation: Sightsavers
Reporting period: Calendar year 2011

What GRI reporting level did the organisation report on?

- A
 B
 C

Did the Secretariat contact the organisation for further information before forwarding the report to the panel?

- Yes
 No

Comment: -

COMMENTS ON THE INFORMATION PROVIDED IN THE REPORT

Profile Disclosures (recommended 28)

Number of Profile Disclosures the organisation reports on in total: 28

Number of the recommended Profile Disclosures the organisation reports on: 28

Number of additional Profile Disclosures the organisation reports on: 0

Profile	Comments
Strategy and Analysis	
1.1*	Fully addressed Good Practice: The assessment of the past year, and the priorities for next year are well described.
Organisational Profile	
2.1*	Fully addressed
2.2*	Fully addressed Good Practice: The organisation's primary activities are clearly described and linked to the overall vision and mission. 'SIM (Strategy, Implementation and Monitoring) card' is useful. However this section could be more succinct.
2.3*	Fully addressed
2.4*	Fully addressed
2.5*	Fully addressed
2.6*	Fully addressed
2.7*	Fully addressed
2.8*	Partially addressed The report does not include information on the number of members and/or supporters. More information on the scope/ scale of the organisation's activities could be included (such as number of projects or beneficiaries).
2.9*	Fully addressed
2.10*	Fully addressed
Report Parameters	
3.1*	Fully addressed
3.2*	Fully addressed
3.3*	Fully addressed
3.4*	Fully addressed

3.5*	Fully addressed
3.6*	Fully addressed The information provided under the majority of components relates to the entire organisation, but under a few components the information was not available for the entire movement.
3.7*	Fully addressed
3.8*	Fully addressed
3.10*	Fully addressed
3.11*	Fully addressed
3.12*	Not applicable
Governance, Commitments, and Engagement	
4.1*	Fully addressed Good Practice: The fact that the organisation has a Remuneration committee and an induction for its Board is very positive.
4.2*	Fully addressed
4.3*	Fully addressed
4.4*	Fully addressed
4.14*	Fully addressed
4.15*	Fully addressed The organisation is encouraged to provide a link to the Corporate Engagement Policy

*: Recommended Profile Disclosures

Performance Indicators (recommended 18)

Number of performance indicators the organisation reports on in total: 18

Number of the 18 recommended performance indicators the organisation reports on: 18

Number of additional performance indicators the organisation reports on: 0

Indicators	Comments
Program Effectiveness	
NGO1*	Partially addressed The report includes clear information on the process for the involvement of stakeholders and the initiatives which will be put in place. Examples of how the feedback affects the decision making process or reshapes policies would be useful.
NGO2*	Fully addressed This section could be more succinct.
NGO3*	Partially addressed The report provides information on the system for programme monitoring and evaluation, and on internal learning; however it does not give examples of adjustments to policies and programmes and how these were communicated.
NGO4*	Partially addressed The report fully addresses gender and disability; however it does not provide information on ethnicity and contains little information on age.
NGO5*	Fully addressed Good Practice: The answer is detailed and good examples of corrective actions taken are provided
NGO6*	Fully addressed Good Practice: The answer is detailed and provides a good explanation as to how the organisation arrives at the bigger picture and where its contribution is the most useful.

Economic	
NGO7*	Fully addressed
NGO8*	Fully addressed
EC7*	Fully addressed The organisation states that it has a practice to recruit people currently resident in a country; however it might benefit from introducing a global policy or guidance.
Environmental	
EN16*	Partially addressed The organisation states that the figure provided only concerns its largest office in the UK because it is not possible to collate data from overseas offices. The organisation is encouraged to liaise with other Charter Members for possible suggestions on how to collate this information.
EN18*	Partially addressed The report includes information on the initiatives to reduce emissions; however it does not state the reductions achieved.
Labour	
LA1*	Fully addressed
LA10*	Partially addressed The figures are broken down by region and directorate, but not by employment category such as senior management and administration. It is positive that the organisation included concrete examples of training.
LA12*	Fully addressed
LA13*	Fully addressed
Society	
SO1*	Fully addressed
SO3*	Fully addressed The organisation does not have a standalone training programme on anti-corruption policies, but employees are introduced to the policy during their induction process.
Product Responsibility	
PR6*	Partially addressed The report gives detailed information on the complaints received but does not distinguish between the ones in relation to the rights of affected stakeholders and of donors.

*: Recommended performance indicators

Other Good Practice

- **Charter Principles:** The organisation included a table showing where the Charter Principles are referred to in the report.

Organisation's commitments for the future

- **1.1:** "In addition to being signatories of the INGO Accountability Charter, we have committed to reporting under the International Aid Transparency Initiative (IATI) by 2013."
- **NGO1:** "Affected stakeholders are involved in the planning and implementation and we are working to improve their participation in learning." "Sightsavers is currently piloting and refining a new M&E process".

- **NGO2:** “As part of the increased focus on quality, Sightsavers is appointing a Quality Systems Advisor, due to start in late April 2012. This post will be responsible for the development of a more systematic approach to receiving, analysing and using information to improve quality. This system will range from formal quality assessments through to individual complaints processes, but with the understanding that while Sightsavers can support the process and can conduct assessments, quality improvement must lie in the hands of those with responsibility for service provision, for example health and education ministries.” “The organisational complaints procedure is currently undergoing review”.
- **NGO3:** “Sightsavers has developed and is in the processes of institutionalising a bespoke system for monitoring, evaluation and learning. The system is referred to as Sightsavers Adaptive Monitoring and Evaluation (SAME) system”. “Though evidence from monitoring is used to report semi-annually, Sightsavers’ programmes are still struggling to learn consistently through reflection on the monitoring data. Such concerns were raised in the internal staff survey, particularly around learning from past experience. The Strategic Management Team has therefore made commitments to review this and has set an internal process to investigate and develop a pragmatic approach to learning.”
- **NGO4:** “Sightsavers’ country offices are expected to disaggregate all output data by sex. In 2012, they will also be asked to disaggregate data by age group.” “A Gender Policy was agreed by Council in July 2011 and operational guidance based on this policy is currently being developed.” “Currently Sightsavers does not have specific tools or recommended processes to undertake specific gender and diversity analysis but these will be provided as part of the Guidance that will be produced in 2012.”
- **LA13:** “Although Sightsavers collects data on ethnic origin in Europe there is not presently a mechanism for collection of this data across the other regional areas of operation. This is something that will be developed in the future.”