Feedback from the Independent Review Panel
Review Round November 2015

16 December 2015

Dear Caroline Harper,

Many thanks for submitting your INGO Accountability Charter report. In times of conflict and climate change, when civil society organisations (CSOs) have an increasingly important role to play, the space for civil society is shrinking in many parts of the world. Strong accountability and the demonstration that we "walk our talk" have never been more important. It is also against this background that the Charter has initiated an alliance with seven national CSO accountability frameworks to strengthen our collective voice as we devise a shared Global Standard for CSO Accountability.

Before providing you with an individual assessment of your report, there were some issues that arose in all or many reports that the Independent Review Panel wants to share with you:

Getting fit for the digital age

Digitisation allows for unprecedented connectivity. At a time when citizens have increased levels of agency and literacy this is a game changer in the way CSOs work. Mobilisation and relationship building with large numbers of people to *co-create* the change they want to see is at the heart of most new CSO strategies – particularly in campaigning. Working *with*, not *for* stakeholders, is not just seen as the right thing to do, but also as the most impactful.

Important in this evolution is moving ICSOs from transparency to actively sharing information, from consultation to joint decision making and from taking responsibility for others to sharing mutually defined responsibilities.

The Charter has initiated the *Digital Accountability* project and Amnesty International, Greenpeace, Oxfam, Transparency International and others are already intensively involved in this project. We look forward to more cooperation with and among Member organisations on this particular issue and for these issues to be addressed more in future reports.

Globalisation / National level accountability

Decentralisation processes usually place more responsibility and capacity at the national level. To ensure an ICSO presents a unified, coherent voice and can protect its brand, a strong and globally shared understanding of mutual accountability is key. Thus, decentralisation often goes hand in hand with a stronger mandate for the ICSOs' global accountability mechanisms. These should help national entities build capacity in the accountability practice, and also demand stronger delivery on global commitments. Charter Members are encouraged to ensure that all their entities adhere at least to the following minimum standards: transparency, effective and independent oversight, involving people we serve, coordination with partners, sound financial management and impact focus.

Inclusion and diversity

Many Charter Members still focus mainly on gender when demonstrating their accountability in terms of diversity. This is a lost opportunity. As we all know, there is also discrimination on the basis of disability, age, ethnicity, etc. Actively reaching out to these constituencies will strengthen their rights and their participation. For example, positive action can increase the employment of those with disabilities or from minority ethnic groups. Such inclusion is central to a human rights based approach, but may also improve results by tapping into a wider

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base of experience. For further advice, click here on the outcome of a Charter webinar on inclusion or here to look at some good practice examples of Charter Members.

Please ensure that all points listed above are taken into consideration when further developing your accountability practices in the coming months and collecting data for the next INGO Accountability Charter report.

Organisation-specific feedback to Sightsavers

Sightsavers' fourth accountability report to the INGO Accountability Charter is a concise interim report based on last year's Improvement Analysis, which came along with the Independent Review Panel's feedback letter.
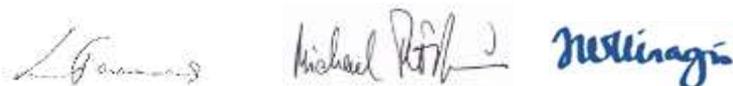
Institutional commitment is highlighted in the CEO's opening statement. It is appreciated that Sightsavers proudly presents Charter membership on their governance website (see here); however, Charter Members are also encouraged to publish the Charter logo (as Sightsavers did in the past). This visualisation would strengthen their commitment to accountability more prominently in its digital communication.

As recommended in last year's feedback, **evidence** that policies and procedures work well in practice is more frequently provided in this report. Policies which are not published online are moreover shared with the Panel. In light of previous Panel feedback, Sightsavers will also look into the development of an overarching Fundraising Policy. Overall, it is clear that Sightsavers takes the Panel feedback seriously and tries to incorporate it into ongoing or new initiatives or reviews. Finally, Sightsavers' often commended SIM card (Strategy, Implementation and Monitoring Card) is currently being reviewed and the Panel looks forward to learning more in this regard. The SIM Card can again be highlighted as a model of **Good Practice** in organisational learning and oversight and the interim report itself is a commendable model for this new format.

Our intention is that this letter, and any response you may wish to provide, is made publicly available on the Charter website along with your report. You can find the reports that were previously reviewed on our website. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 20 January 2016.

If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat. We are also available for bilateral conversations with Members' senior leadership team and look always forward to hearing your views.

Yours sincerely,

Louise James	·	Michael Röskau	·	Jane Kiragu

Rhonda Chapman	·	John Clark	·	Saroeun Soeung

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Sightsavers

Interim Report 2014
(Based on the Improvement Analysis for the 2013 Report)

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	***Statement from the most senior decision-maker*** *Fully addressed* Caroline Harper, the CEO of Sightsavers, provides again a very strong institutional commitment to accountability. She highlights how Sightsavers has invested in strong alliances with partners like the Gates Foundation, DFID or other disability CSOs to improve collective impact. Transparency and mutual accountability are paramount for these partnerships to be effective. Besides improving Sightsavers' direct organisational accountability in regard to more transparency on their website, reducing the carbon footprint and increasing management efficiency, she highlights the importance of scanning the horizon to optimally tap into opportunities and strategically align with stakeholders outside of their organisation. This shows a concept of accountability that is very strategic and far sighted for Sightsavers but also for the sector in general. Accountability is featuring more and more in UK press and the crucial trust in CSOs is under threat. Sightsavers states that accountability could not be more important nowadays and is at the centre of their decisions. Finally, the Panel positively notes that their objective feedback is appreciated and complements stakeholder comments.

MATERIAL CHANGES
The Panel commends Sightsavers for undertaking a review of its Strategy Implementation and Monitoring (SIM) Card in 2014. Beyond this being a strategic review, it was envisaged to replace indicators that were not providing sufficient / relevant evidence. The changes should be adopted at the January 2015 Council meeting. Unfortunately, the provided link to the SIM Card does not work but it is easy to find on Sightsavers' governance page (see SIM Card and Dashboard) and is excellent. Other developments include the strategic alignment process (SAP) which allows making better informed decisions by providing a global lens across each of Sightsavers' thematic areas and thus a better way of identifying gaps and opportunities for Sightsavers to add value in the broader scheme of things. The SAP also allowed for the conceptualisation of an organisational Empowerment and Inclusion Strategy (roll-out in 2015) and the Programme Portal which is a new system for monitoring project implementation which should enable Sightsavers to collect output data on a quarterly basis improving oversight and performance management. How can this Portal be user-friendly to collect all relevant data? This is all very positively noted by the Panel who look forward to progress updates in the 2015 report.

EVIDENCE
Sightsavers followed up on the Panel's recommendation and will provide more links to policies in the 2015 report. Some policies were also shared along with the report to the Panel. However, the Panel's request for more evidence throughout the report is not so much geared towards evidence of existing policies, but rather evidence that they are well known by staff and show good effects in practice. The Panel appreciates that Sightsavers aims at translating its policies into effective implementation which is supported by the SIM Card review, but would like to see evidence of results in the next report.

III. Report Parameters	
3.5	**Reporting process** *Fully addressed* This interim report overall shows that previous Panel feedback was taken into account and led to organisational changes and initiatives such as a Transparency Working Group, a global transparency resource in their intranet or mainstreaming accountability in the newly developed Project Design Process and Partnership Framework review. The 2013 report was disseminated globally throughout the organisation and areas of focus in the Improvement Analysis were discussed in depth with the responsible teams. What role does the report play within these different internal groups? Is the report and Panel feedback also actively shared with external stakeholders?

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO2	**Mechanisms for feedback and complaints** *Fully addressed* The Complaints Policy (rolled out in 2014) has been running successfully for one year and a direct link has been established between Sightsavers' Complaints policy and their internal control and assurance mechanisms. However, the link they provide to the Complaints Policy does not work, and an advanced Google search of both .org and .net websites yielded nothing either complaints portal or policy. Internal and external complaints now influence the organisation's approach to assurance and testing as well as internal audits ensure that operational changes in response to complaints are adequate in order to mitigate future. Sightsavers was last year commended for the Global Complaints Policy itself, the fact that there are no restrictions how complaints can be made and the timeliness (responding within 30 days). However, such a policy is meaningless unless those who may have a complaint know what the policy says and how they can easily forward a complaint. Finally, as also mentioned in the previous feedback, the Panel is interested to hear more information on the number and kinds of complaints received, how complaints are dealt with and how this will improve stakeholder feedback to be used by decision-makers.
NGO5	**Advocacy positions and public awareness campaigns** *Fully addressed* A commitment is made to research- and evidenced-based policy positions derived

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from within the organisation and from outside. It is very much appreciated that, to ensure continued consistency in this area, a Policy Development Guide (shared with the Panel) was rolled out in 2014. It aims at promoting good practice in policy development within the Policy and Global Advocacy Directorate (PGA) and seeks to draw a closer link between the policy change desired and the policy paper. This in turn should enable Sightsavers to meet its SIM card objective, of delivering effective joined-up advocacy more effectively.

IV. Human Resource Management

NGO9 | **Mechanisms to raise grievances**
Addressed
Sightsavers has a grievance procedure in place which includes an organisational policy (reviewed in 2014) and process for handling grievances. Relevant documents were shared with the Panel and it is suggested to make these publicly available.

Sightsavers is again encouraged to provide evidence in the next report that concerns raised were resolved satisfactorily.

VI. Responsible Management of Impacts on Society

PR6 | **Ethical fundraising and marketing communications**
Fully addressed
Sightsavers does not have an organisational policy on fundraising but the organisation and its entities adhere to a broad number of legal national standards and voluntary codes. The number of complaints received, broken down by activity for 2014, is provided. It is positively noted that these complaints are made transparent in line with the Fundraising Standards Board (FRSB) – see here. However, these reports and different types of complaints are not made public either via the FRSB website (the Panel has written to FRSB about this) or placed on Sightsavers' website. In 2014, all complaints received were resolved satisfactorily by the Customer Care team without escalation to senior management teams being required. The FRSB has its own complaints handling mechanism and all complaints raised to Sightsavers were resolved in 2014.

Finally, it is very much appreciated that the Panel's recommendation to implement an overarching Fundraising Policy is fed into the review of Sightsavers' Donations Acceptance Policy. The Panel looks forward to hearing more in this regard in the 2015 report.

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