

## Feedback from the Independent Review Panel Review Round November 2014

Berlin, 09 December 2014

Dear Dave McComiskey,

Many thanks for submitting your accountability report to the INGO Accountability Charter. Before providing specific feedback on your organisation's report, let us highlight three areas of general concern that occurred in most of the 12 reports submitted for the fall review round:

### 1.) **Be clear on why accountability is important for your organisation**

For Charter reports to be meaningful, it is important to start with a clear description of the organisation's *specific* understanding of accountability and how this shapes strategic decision-making and operations in regard to governance, finance, programme, fundraising, campaigning, HR etc. Be clear about whom you are most accountable to and how communication with them improves achieving your strategic goals. Find [here](#) on our website the Charter's currently used definition. Throughout the report, let us know how you use accountability to continuously add value to your organisation.

### 2.) **Moving from "GAP Analysis Table" to "Improvement Analysis"**

It is the key aim of the INGO Accountability Charter to support continuous organisational improvements. Against this background the GAP Analysis Table was introduced to showcase at a glance where progress has been achieved and which areas need to be further addressed. We observed that this worked quite well for some, but not for all organisations. One difficulty being that it became overloaded with information without differentiating important and much less important issues. We therefore suggest that organisations for which this instrument has worked well, keep it as a very good internal document to follow up on progress. For the purpose of the reporting and vetting exercise, however, we suggest having a much more succinct "Improvement Analysis", capturing only the most relevant issues that need to be addressed. The Panel has tried to summarise these areas for your organisation at the end of this Feedback Letter. If this does not reflect your own priorities, please let us know. The "Improvement Analysis" is also considered to be the basis for the very brief interim reports of those organisations moving to biannual reporting.

### 3.) **Level of Evidence**

Our sector is often criticised for having very good intentional language, but few facts and figures to prove its claims. It is against this background that the Panel asks for compliance to be proven on three levels: (i) having a written policy, (ii) providing evidence that the policy is known and applied by staff and (iii) assurance that it leads to positive management response and helps improving effectiveness in achieving your organisation's goals. While much progress has been made at the policy level, evidence for application in practice and better impact is still relatively low. While we do acknowledge that it is not an easy task to provide this evidence for very large, international organisations, we have also seen some very good attempts. Some examples include: (a) reporting the percentage of national entities which comply with certain standards, (b) leveraging existing surveys that provide relevant hard data, (c) thorough globally set parameters, evidenced by random national level controls or d) illustrative case studies.

Please ensure that all the three points listed above are taken into consideration when collecting data for the next INGO Charter report.

## Organisation-specific feedback to CBM

CBM's fifth accountability report to the Charter can be generally seen as very good, comprehensive, complete, very accessible, and having improved from previous reports.

The report's opening statement provides a strong **institutional commitment** to accountability which is underlined by CBM publishing all accountability reports on its website, describing the Charter (including the logo) and linking to the Charter website (see [here](#)). It is positively noted that CBM's Global Programme Strategy-II (2014-2018) will have a stronger emphasis on including rights-holders and on strengthening the voice and participation of persons with disabilities right from the community to the global level.

Many areas in the report can be regarded as lessons learnt for others. The following areas can be particularly seen as **Good Practice** for other organisations: CBM's cross-functional reporting process (3.5); a strategic and programmatic partnership approach that takes accountability indicators into account (NGO6); a robust and effective resource allocation and monitoring system (NGO7); and a detailed breakdown of diversity of workforce and governance bodies (LA13).

Areas of improvement include providing **evidence** that described procedures actually work in practice, e.g. how stakeholder, partner or staff feedback has positively shaped decision-making. It is appreciated that CBM submitted an updated **GAP Analysis Table** along with its accountability report. Progress has been noted, e.g. in the areas of complaints handling mechanisms, an anti-corruption policy, and the Panel looks forward to future developments.

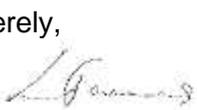
As explained in the generic part of this feedback letter, the Panel decided to replace the old format of the GAP Analysis Table with a more succinct "**Improvement Analysis**". Based on this report's assessment, we have written this for you and you find it attached to this letter. From now on we will use this format serving also as a baseline for you to summarise progress made in these areas and covered in more detail in the full report. Please feel free to adjust and complement this analysis from your perspective.

Overall CBM is commended for a very high level of transparency and accountability to its key stakeholders and the Panel suggests **reporting every two years against Charter commitments from now on**. In a very brief **interim report** the Panel would like to see only information on progress identified in the attached "Improvement Analysis".

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 10 January 2015.

If you have any other feedback or comments on our work, please share them with us by sending them to the Charter Secretariat. We look forward to hearing your views.

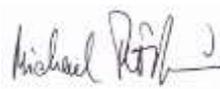
Yours sincerely,



Louise James



Wambui Kimathi



Michael Röska



Jane Kiragu



Rhonda Chapman



John Clark



Saroeun Soeung

Review Round October 2014  
Cover Note on Accountability Report

**CBM – Christian Blind Mission**

*Reporting period: Calendar year 2013*

PROFILE DISCLOSURES	
<b>I. Strategy and Analysis</b>	
1.1	<p><b>Statement from the most senior decision-maker</b> <i>Fully addressed</i></p> <p>The report's opening statement from CBM's President provides a very strong commitment to accountability, understood as meeting good practice standards in operational, financial and programmatic excellence at all levels of the organisation, and demonstrating accountability towards their target group, primary stakeholders, partners, donors and the public. However, the statement would profit from a short explanation of what accountability <i>exactly</i> means to CBM and which <i>specific</i> role it plays in achieving the described aims and developments.</p>
<b>II. Organisational Profile</b>	
2.1 – 2.7	<p><b>Name of organisation / Primary activities / Operational structure / Headquarter location / Number of countries / Nature of ownership / Target audience</b> <i>Fully addressed</i></p> <p>Very sound information is provided in all answers, often supported by visuals and graphs which make the information very accessible and easy to understand.</p>
2.8	<p><b>Scale of organisation</b> <i>Fully addressed</i></p> <p>The answer gives detailed figures about CBM's scale, including numbers of employees, finances, supporters and donors, partners, projects, and various activities. The multiple activities, including medical treatments and trainings, are broken down very accurately and it would be interesting to know which method/system is used to arrive at these figures.</p>
2.9	<p><b>Significant changes</b> <i>Fully addressed</i></p>
2.10	<p><b>Awards received</b> <i>Fully addressed</i></p> <p>CBM can be commended for having received plenty of awards for CBM supported projects in the reporting period. This is an impressive success.</p>
<b>III. Report Parameters</b>	
3.1 – 3.4	<p><b>Reporting period / Date of most recent report / Reporting cycle Contact person</b> <i>Fully addressed</i></p>

3.5	<p><b>Reporting process</b>  <i>Fully addressed</i></p> <p>As in last year's report, the answer given provides again well laid out information about the process for defining report content and is considered to be <b>Good Practice</b> in the way the report is institutionalised and used to engage all functions of the organisation to think strategically about accountability as a key quality assurance tool. The Cross-functional INGO Accountability Report Team works closely with the Executive Management Team (EMT) which prioritises the identified key issues. Panel feedback is disseminated via departmental workshops, discussed and followed up upon. Moreover, the reporting process is accessibly visualised (p.11). Finally, the Panel encourages CBM to follow-up with the readers of the report and receive their feedback in the future.</p>
3.6 – 3.7	<p><b>Report boundary / Specific limitations</b>  <i>Fully addressed</i></p>
3.8	<p><b>Basis for reporting</b>  <i>Partially addressed</i></p> <p>It is understood that CBM does not have global statistics on HR, advocacy effectiveness and environmental performance for the entire CBM Family (see 3.6). However, it would be critical to know what systematic assurance CBM has in place that the Member Associations comply with the accountability commitments in these areas.</p>
3.10 – 3.12	<p><b>Reporting parameters / Reference table</b>  <i>Fully addressed</i></p>
<b>IV. Mission, Values, Governance, and Stakeholder Engagement</b>	
4.1	<p><b>Governance structure</b>  <i>Partially addressed</i></p> <p>The answer given provides relevant information about the governance structure, different committees and decision-making processes. However, CBM is strongly encouraged to state if there is effective risk management in place that ensures compliance of the organisation's governance model with relevant regulations in the different jurisdictions. Moreover, the Assembly and Supervisory Board only meet once a year and the Panel would like to know how CBM ensures a strong oversight on management in the meantime and if there are sub-structures in place that ensure effectiveness in such a large organisation.</p>
4.2 – 4.3	<p><b>Division of power between the governance body and management / Independence of Board Directors</b>  <i>Fully addressed</i></p>
4.4	<p><b>Feedback from internal stakeholders</b>  <i>Fully addressed</i></p> <p>CBM can be commended for various mechanisms to engage internal stakeholders – e.g. bi-annual global employee satisfaction surveys, staff councils, staff meetings, organisational strategy workshops, and Peer Reviews between Member Associations and Board members. It is stated that results</p>

	from these mechanisms are included in action plans; however, no concrete evidence or example is given that staff and/or Member recommendations have shaped decision-making of the EMT.
4.5	<b>Compensation for members of highest governance body and executives</b> <i>Addressed</i> The Panel encourages CBM to be more explicit on salary rates.
4.6	<b>Conflicts of interests</b> <i>Fully addressed</i>
4.10	<b>Process to support highest governance body's own performance</b> <i>Partially addressed</i> CBM is encouraged to describe how results from the mentioned annual self-reviews of Board performance are used to further improve the effectiveness of this body. Moreover, it would be helpful for the reader if there was either a direct link to the Articles of Association or if the relevant part on term limits etc. was clarified in this answer.
4.12	<b>Social charters, principles or other initiatives to which the organisation subscribes</b> <i>Fully addressed</i>
4.14	<b>List of stakeholders</b> <i>Fully addressed</i> CBM can be commended for a very detailed and comprehensive breakdown of its stakeholders.
4.15	<b>Basis for identification of stakeholders</b> <i>Fully addressed</i> The Panel very positively notes that CBM applies strict partnership criteria as outlined in the answer and published on their website. However, more information how these criteria result in good partnerships and on the prioritisation of key stakeholder groups could be given. Furthermore, the Partnership Framework Memorandum (PFM) should rather be included in NGO6 of this report.
4.16 – 4.17	<i>Moved to NGO1.</i>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<b>Involvement of affected stakeholder groups</b> <i>Addressed</i> It is highly appreciated that CBM's Global Programme Strategy-II (2014-2018) will have a stronger emphasis on including rights-holders and on strengthening the voice and participation of persons with disabilities right from the community to the global level. The organisation's Project Cycle Management (PCM) follows an inclusive and transparent approach and puts focus on joint planning, partners' ownership and community involvement. However, specific formats/tools of engagement are not reported on, although the Panel notes that there are no one-

	<p>size-fits-all solutions. Finally, evidence that the current stakeholder engagement processes have positively affected the decision-making would be welcome in the next report and the Panel looks forward to results from first Inclusive Project Cycle Management (IPCM) trainings.</p>
NGO2	<p><b><i>Mechanisms for feedback and complaints</i></b>  <i>Addressed</i></p> <p>The answer provides relevant information on newly implemented and comprehensive anti-corruption measures (“The Red Flag System”), a Whistle-blower System and a Programme Development Feedback System (the two latter ones being implemented in 2014). These mechanisms are very commendable but should be better reported on under indicator SO3. As for the Programme Development Feedback System, the Panel looks forward to be informed on the kind of complaints CBM receives, how these have been resolved and if there is evidence for positive management response. The position of a Programme Development Feedback Manager is positively noted.</p>
NGO3	<p><b><i>Programme monitoring, evaluation and learning</i></b>  <i>Partially addressed</i></p> <p>CBM can be regarded as a learning institution. The answer provides interesting updates on the development of CBM’s thorough tools and monitoring framework allowing for flexible contextualisation. The Panel looks forward to lessons learnt from the first pilot phase on the new Monitoring on Inclusion system and to the extension of the log frame-based quarter report pilot (Project Progress Report) in the next report. CBM is encouraged to demonstrate how programme adjustments are put into effect and if the monitoring framework has overall led to positive management response.</p>
NGO4	<p><b><i>Gender and diversity</i></b>  <i>Partially addressed</i></p> <p>CBM’s core mandate is Disability Inclusive Development which aims at placing the overall project planning, implementation, monitoring and learning cycle on a sound, empowering and equitable understanding of gender and diversity. The Panel supports CBM in investing further in evidence building on the intersectionality of gender and disability with other aspects of diversity. It would be interesting to know if CBM has got a specific policy in place and if they set any guidelines or targets that can be verified objectively in this regard.</p>
NGO5	<p><b><i>Advocacy positions and public awareness campaigns</i></b>  <i>Partially addressed</i></p> <p>Similar to the previous one, this report provides convincing information with regard to including affected stakeholders in the policy formulation process through “self-advocacy” and ensuring that CBM’s messages are meaningfully based on the positions of the disability movement. However, information on a process for corrective adjustment of advocacy positions or exiting a campaign where necessary is missing.</p>
NGO6	<p><b><i>Coordination with other actors</i></b>  <i>Fully addressed</i></p> <p>The revised Global Programme Strategy strengthens CBM’s collaborative approach in the programme work at country level which also helps to identify key stakeholders and partners at the local level. The Strategy also focuses on the</p>

	<p>quality of partnerships, including in the area of accountability that becomes a mutual commitment between CBM and its partners. This approach and partnership criteria can be seen as <b>Good Practice</b>. Nevertheless, evidence that these systems work well in practice and how success is tracked are welcome in the next report. Finally, the Panel appreciates CBM's website on capturing complexities with partners and co-workers.</p>
<b>II. Financial Management</b>	
NGO7	<p><b>Resource allocation</b> <i>Fully addressed</i></p> <p>The report outlines a very robust effective resource allocation and monitoring system that is aligned to CBM's strategies and includes strong controls in place at the programme, admin and finance level. This can be seen as <b>Good Practice</b> for other organisations. However, the Panel would be interested in the reasons for <i>not</i> publishing the annual financial report on CBM's website.</p>
NGO8	<p><b>Sources of Funding</b> <i>Fully addressed</i></p> <p>CBM International cannot report on the five largest donors since this information that is specific to Member associations. On the positive side, CBM followed up on the last Panel feedback and provided information on the types of donors and amounts. CBM is again commended for a highly autonomous income basis from individual funders (68%).</p>
<b>III. Environmental Management</b>	
EN16	<p><b>Greenhouse gas emissions of operations</b> <i>Fully addressed</i></p> <p>CBM is commended for providing emission data from CBM EU Office (Brussels) and Central East Asia Office (Thailand) additionally to the International Office this year. The Panel strongly supports CBM's plans to include all remaining Regional Offices in the 2014 Accountability Report. The increase over 2012 is due to increase in business travel.</p>
EN18	<p><b>Initiatives to reduce emissions of operations</b> <i>Fully addressed</i></p> <p>An Environmental Sustainability Advisory Working Group is currently developing an Environmental Management System (EMS). Interesting initiatives to reduce emissions include commuting, web conferencing tools, minimising paper use and water consumptions.</p>
EN26	<p><b>Initiatives to mitigate environmental impact of activities and services</b> <i>Fully addressed</i></p> <p>Initiatives to mitigate environmental impacts of CBM's activities include moving into a new more energy efficient head office building and creating case studies with people with disability in their communities. CBM is piloting a new intersectional approach which assesses its environmental impact prior to carrying out activities and plans to incorporate environmental enhancement opportunities together with programme opportunities.</p>
<b>IV. Human Resource Management</b>	
LA1	<p><b>Size and composition of workforce</b></p>

	<p><i>Fully addressed</i></p> <p>It is advised to merge the tables on p.39 and on p.42/43 to provide more comprehensive information, e.g. on the percentage or relation of workforce with disabilities.</p>
EC7	<p><b>Procedure for local hiring</b></p> <p><i>Fully addressed</i></p> <p>Detailed numbers for expatriate and local staff members in the different offices are provided under LA1 (p.39). In order to underline CBM's commitment to promote local recruitment, the Panel recommends putting a formal policy into place.</p>
LA10	<p><b>Workforce training</b></p> <p><i>Addressed</i></p> <p>78% of staff have participated in at least one training course in 2013. The Panel welcomes more information on how CBM identifies training needs and if there is evidence that staff training is successful in the next report.</p>
LA12	<p><b>Global talent management</b></p> <p><i>Partially addressed</i></p> <p>Although numbers have increased from 2012, the Panel would be interested to know if and how CBM plans to further improve the percentages for performance review (64%) and objective setting (77%) at the International Office and Regional and Country Offices. Moreover, the Panel looks forward to progress in regard to the described Competency Model which will help to identify structured development needs.</p>
LA13	<p><b>Diversity of workforce and governance bodies</b></p> <p><i>Fully addressed</i></p> <p>CBM provides a very useful and self-critical breakdown and analysis of diversity factors (gender, nationality, age, persons with disabilities) according to different governance and management levels. This can be seen as <b>Good Practice</b>. The Panel would be interested in any set targets in the next report.</p>
NGO9	<p><b>Mechanisms for workforce to raise grievances</b></p> <p><i>Addressed</i></p> <p>All employees can provide feedback in the global employee satisfaction survey which is conducted every other year. Employees of the International Office can furthermore use the staff council to raise complaints. Is there evidence that raised concerns were resolved satisfactorily? Moreover, the Panel looks forward to first outcomes from the Dispute Resolution Process for Regional and Country Offices that was launched in the beginning of 2014.</p>
<b>V. Responsible Management of Impacts on Society</b>	
SO1	<p><b>Managing your impact on local communities</b></p> <p><i>Partially addressed</i></p> <p>CBM gives an interesting example how they developed a useful training resource to empower parents who care for children with disabilities. General information is, however, missing on CBM responsibly assesses and manages its impact on the wider community and if there are exit strategies in place if necessary.</p>
SO3	<p><b>Anti-corruption practices</b></p> <p><i>Fully addressed</i></p>

	<p>Newly introduced mechanisms like the Red Flag System, Whistleblower System and the Programme Development Feedback System as well as the Critical Project List help to ensure effective and very robust anti-corruption procedures. CBM states that a policy to prevent corruption and fraud in its activities and operations was approved and implemented in the beginning of 2014. The Panel looks forward to being informed if this policy is well known and used by staff.</p>
SO4	<p><b><i>Actions taken in response of corruption incidents</i></b>  <i>Fully addressed</i>            The answer provided gives an overview of incidents occurred in 2013 (detected through the Red Flag System) and describes two examples in detail. Are such incidents published anywhere else?</p>
<p><b>VI. Ethical Fundraising</b></p>	
PR6	<p><b><i>Ethical fundraising and marketing communications</i></b>  <i>Partially addressed</i>            CBM provides thorough information in regard to fundraising practices and codes in the respective Member Associations' countries. A link to the mentioned policy on the ethical and respectful use of pictures would be welcome in the next report.</p>

## CBM

### Gap Analysis Table – Areas of Commitments and Progress achieved

Accountability is a process of continuous improvement. Each year Charter Members in their accountability reports identify and prioritise areas for improvement and corrective actions they plan to take. As of reports submitted in 2014, Members are asked to capture these commitments in this Gap Analysis Table. The Independent Review Panel may suggest the Member to add further issues when reviewing the Member's report. Each year following, the table shall be submitted along with the accountability report and will then be used as a basis to demonstrate progress. The table will be published on the website along with the accountability report and the feedback from the Panel.

*NOTE: The Panel decided to replace the old format of the GAP Analysis Table with a more succinct “Improvement Analysis”. Based on this report’s assessment, we have written this for you and you find it attached to this letter. From now on we will use this format serving also as a baseline for you to summarise progress made in these areas and covered in more detail in the full report.*

GRI - Performance Indicators	Reporting year 2010	Reporting year 2011	Reporting year 2012	Reporting year 2013
<b>General</b>				
1.1 Strategy and Analysis.		<i>“It is our objective to provide transparent information on the CBM Family globally. This implies the development of global standards and an alignment of HR processes. While the work on this has started, the results will be included in next year’s report.”</i>	Work in progress reported and implementation promised for 2013.	<i>CBM developed its Global Programme Strategy in 2013. This was an inclusive and participatory approach to developmental programming. Executive Management reviews and reports to the Board (against agreed targets) annually on strategy implementation.</i>
<b>Programme Effectiveness</b>				
NGO1: Involvement of affected stakeholders.				<i>“In 2014-15, Inclusive Project Cycle Management trainings will be rolled out to our Regional Offices (...).”</i>
NGO2: Mechanisms for feedback and complaints.		<i>“The organisation’s processes to raise complaints are under revision, and the organisation will implement a whistleblower process in 2013.”</i>	<i>“The concepts [feedback and complaints mechanisms] were initiated within the reporting period and will be further developed in 2013 for their</i>	<i>“Fully functioning whistle-blower system rolled out in early 2014 to manage complaints from our internal and external stakeholders with particular focus on managing fraud, corruption,</i>

			<p><i>launch and gradual roll-out.”</i></p> <p><i>“CBM International is working on the introduction of a global Whistleblower process (...).”</i></p>	<p><i>mismanagement, and situations of gross mismanagement.”</i></p>
<p>NGO3: System for programme monitoring, evaluation and learning.</p>		<p><i>“A framework for monitoring, evaluating and learning is being developed.”</i></p>	<p><i>“In 2012 a [new] monitoring framework was designed. (...) 26 partner programmes were selected for the pilot roll-out in 2013 up to end of 2014. Based on the results (...), necessary changes/ amendments and a decision in regard to a global roll-out will be made.”</i></p>	<p><i>“Being at the early stage of the pilot phase, data or evidence were not yet available to conclude on how the Monitoring on Inclusion system could inform and influence our work quality improvement, our strategic decisions, our policies and approaches. First lessons learnt and key findings and recommendations should be collected at the end of the first pilot phase from the reflection stage at the end of June 2014. As the 3-year pilot phase is being planned until April 2015, the results of the Monitoring on Inclusion system will only be known at that stage, which should allow CBM to endorse it and then implement it more broadly.”</i></p> <p><i>“The extension of the Log frame-based quarter report pilot (Project Progress Report) was postponed to 2014-15.”</i></p> <p><i>“The draft version of the Reference Guides shall be produced by the end of 2014 (...).”</i></p>
<p><b>Economic</b></p>				
<p>NGO7: Resource allocation.</p>			<p><i>“In 2012 CBM started to develop an industry standard whistleblower system and anti-corruption measure called the “Red Flag system”. Both are planned for roll-out in 2013.”</i></p>	<p><i>“CBM is committed to acting with integrity and we have implemented effective systems like the Red Flag System to detect and report on all incidents of corruption during the reporting year. At the time of writing this report we have already activated BKMS® Whistleblowing System and the Programme Development</i></p>

				<i>Feedback System.”</i>
EC2: Financial implications for the organisation’s activities due to climate change.			<i>“The ‘Green Office’ project will pilot its work in 2013 at CBM offices in Germany, Belgium, and Thailand in alignment with CBM Australia.”</i>	<i>“In 2013 we implemented phase one of our energy efficiency management programs. This included calculating our carbon footprint at CBM offices in Germany, Belgium, and our Regional Office in Thailand, purchasing energy efficient equipment, online document filing to reduce paper use, etc. Phase two of the carbon footprint management programme involves reducing emissions from business travel by developing a new travel policy for reducing the number of trips for business related travel and use of video-conferencing facilities.”</i>
<b>Environmental</b>				
EN16: Direct and indirect greenhouse gas emissions by weight.  EN18: Initiatives to reduce greenhouse gas emissions and reductions achieved.  EN26: Initiatives to mitigate environmental impacts of products and services.		<i>“We acknowledge our environmental responsibility and we are developing tools, systems, and processes for the assessment of our environmental footprint leading to an environmental sustainability plan. (...) The results will be the focus of our report in 2014.”</i>	<i>“CBM has developed ... the tools and processes to establish a carbon footprint report following the principles of the Green House Gas Protocol (GHGP). The collaboration enabled us to report on our carbon footprint one year ahead of our commitment.”</i>  <i>“CBM International Office will be moving in 2015 to a new building which will increase energy efficiency to reduce carbon emissions.”</i>	<i>For our environmental footprint, we have reported only for CBM International Office in Bensheim, the CBM Brussels office in Belgium and ASC (CBM Regional office in Thailand). The operational boundary of our environmental footprint assessment includes an analysis of premises' energy use, waste production and disposal, business travel and staff commuting habits...using GHG Protocol. Data is collected across locations, buildings, facilities and assets, using invoices, bills and travel logs.”</i>  <i>“(...) we have plans to include remaining Regional Offices’ emission data in our 2014 Accountability Report.”</i>  <i>“As a long-term solution, we are investing in a new international office building along</i>

				<p><i>with our Member Association CBM Germany to minimize the environmental impacts of our activities. We agree that the design of our new office building affects the environment, and our employee productivity. Through the design of a new office building, we are focusing on minimizing energy use in all stages of the building's life cycle, by making our new office building more energy efficient, comfortable, and less expensive to run. The work on our new office building has already started and we hope to move into the new building in 2015."</i></p>
<b>Labor</b>				
LA1: Size and composition of total workforce.			<p><i>"We promised earlier that data for locally employed staff would be available as of 2012, but the implementation of the worldwide HR database is unfortunately delayed. We expect that the required data will be available for staff contracted in the regions for the 2013 report."</i></p>	<p><i>"Contract details for locally employed staff are not fully available at the International Office, only for some staff that receives a top-up from CBM International is available, hence, the headcount in the respective line item for local staff in regional and country offices is not complete."</i></p>
NGO9: Workforce feedback.				<p><i>"CBM International is well aware of the fact that there is no formal way for expatriate employees and employees of Regional and Country Coordination Offices to lodge a complaint, and hence we have developed the Dispute Resolution Process that was officially launched only in January 2014. The outcome of this new process will be shared in our 2014 report."</i></p>
<b>Society</b>				
SO3: Percentage of employees trained in	<i>"With January 2012 we are</i>	<i>"The organisation's anticorruption policies and</i>	<i>"In 2011, all anti-corruption policies, procedures, and</i>	<i>"We have been working on a policy to prevent corruption and fraud in our</i>

<p>organisation's anti-corruption policies and procedures.</p>	<p><i>planning to have one trainer for administrative standards globally."</i></p>	<p><i>procedures are under revision."</i></p>	<p><i>measures (...). The project will continue into 2013 (...)."</i></p> <p><i>"New training initiatives on CBM specific financial controls to address fraud are planned for 2013 and 2014."</i></p>	<p><i>activities and operations during the reporting year. The draft policy was presented to the board for approval in November, 2013. The board has approved the policy and it was implemented beginning of 2014."</i></p> <p><i>"We have planned a project to equip key Regional Office personnel with background knowledge in anticorruption measures. The project will also see the development of online training modules on anticorruption measures. The project will take place in 2014."</i></p>
<p><b>Product Responsibility</b></p>				
<p>PR6: Ethical fundraising.</p>			<p><i>"CBM took the decision in 2012 to hire a Marketing Director (planned for 2013) with the task to ensure brand coherence and adherence to standards across the CBM family."</i></p>	<p><i>CBM Member Associations adhere to national standards of accountability and are members of National accountability bodies.</i></p> <p><i>CBM monitors communication to ensure adherence to internal standards (picture usage, respectful/accurate language).</i></p>