Sightsavers

INGO Accountability Charter Annual Report 2015

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Reporting format

Sightsavers has moved to bi-annual reporting following recommendation from the Independent Review Panel in the 2013 report feedback letter.

This full report describes changes that have occurred within organisation during the reporting period, as well as progress updates against the areas identified by the panel in the 2013 and 2014 report feedback.

1.   Strategic Commitment to Accountability

1.1 Statement from the most senior decision-maker of the organisation

In the two years since I wrote my last statement much has changed – both positively (the SDGs having been agreed – including extensive references to disability), and negatively (in the UK there has been much consternation about fundraising techniques and some of the media have attacked the government's approach to development funding).

Our priorities over the last couple of years (and indeed for 2016) look particularly at the SDGs.   Previously we were of course looking to influence them, now we are looking to ensure that our programmes (and indeed our whole organisation) are designed so as to help make them a reality. Our drive for inclusive programming is a thread that runs through everything we do and we have been developing a number of programmes to investigate and demonstrate how best to disaggregate data, something that is a pre-requisite for understanding whether people with disabilities are being 'left behind'. Having good data to demonstrate whether you are delivering on promises is the bedrock of accountability.

Our work on neglected tropical diseases continues apace, with a record number of treatments supported last year. We manage major grants, working with as many as 24 other organisations on some contracts, so accountability to a wide range of stakeholders is of fundamental importance to us. Each organisation in such a coalition is accountable to the others, to the ultimate donor and of course to the beneficiaries we serve. We have set up a number of systems to achieve this, and have been pleased with the reaction received.

We have launched a new fundraising policy (stimulated in part by the comments of the Independent Review Panel), which includes a 'fundraising promise' to donors, as well as a policy on acceptance of donations. We think this is really important in the current climate.   We are also reviewing our data protection processes as the new European Directive emerges, along with strengthened cyber security. We are very mindful of the importance of protecting our donor's data, particularly bank details (we don't hold any data on beneficiaries).

Over the last year we refreshed our SIM card – the fundamental building block of our performance measurement and hence strategic decision making. It is important that we keep this up to date as it is a primary tool for holding ourselves accountable and sharing that with others. It is now reflective of our new social inclusion strategy, our NTD work and the SDGs.   We consolidated our websites so we now have a single corporate website – which includes our SIM card results and details of fundraising policy and financial framework. This is of course the first place people go to when looking for information so it is essential that it is of high quality.

We undertook an employee survey last year – which had astonishingly high levels of engagement (97% response rate with over 90% 'proud to work at Sightsavers').   The key area we need to work on is ensuring we 'practice what we preach' in the employment of people with disabilities.

We are constantly looking at better ways to engage with stakeholders of all kinds and to be as transparent as we can in a meaningful way. This, together with the provision of evidence to back up what we do is fundamental to accountability.   So much data is now generated that one of our challenges is how to communicate with stakeholders so they

understand our impact and can access what they need without drowning in a flood of information.

Over the next two years we will be looking to improve our external communication – not least with the introduction of a new Director of News, starting mid-2016, who has a wealth of media experience.

Caroline Harper
CEO, Sightsavers

2. Organisational Profile

2.1 Name of the organisation
The organisation is known as Sightsavers.

2.2 Primary activities
Sightsavers' primary operating model is to work with partners from the countries in which we work. We work together with these partners to deliver our programmes and provide a mixture of grants, capacity building, training and technical expertise as well as ensuring that the work is well managed and beneficiary and supporter requirements are met. Our primary partners on health and education are the relevant line ministries or organisations providing services within the systems overseen by the ministry. In social inclusion work, we work with organisations providing services for people with disabilities as well as organisations representing the interests of people with disabilities in advocating for improvements to lives and livelihoods or access to rights.

The core operational aim of all Sightsavers' projects is twofold: to directly contribute to our four change themes, and to demonstrate what can be achieved so that others (whether it be governments or in some circumstances other players) can take this work to scale. To achieve this second aim, we have increasingly invested in our capacity to undertake research and gather evidence to ensure that our programmes make an impact and are cost effective, so that the advocacy undertaken to support the demonstration approaches has a strong foundation. Advocacy is usually done with partners or other coalitions as this is more effective. In Sightsavers' social inclusion work, supporting blind and disabled people's organisations to advocate for their members' rights is emphasised, as this is more powerful than operating just as Sightsavers.

Sightsavers collaborates with a wide range of international agencies working in development, including the World Health Organisation, World Bank, UK Department for International Development, UN Secretary General's office and the US Agency for International Development; both to fund our programmes, and to influence changes in broader development processes and systems. We also have a growing range of strategic alliances with other international non-governmental organisations with similar objectives, for example, the Fred Hollows Foundation, Helen Keller International, the Carter Center, Light for the World and others.

Thematic strategies exist for eye health, education, social inclusion and research which guide our programmatic approach to delivering programmes across these thematic areas.

2.3 Operational structure of the organisation

Sightsavers is an international non-governmental organisation headquartered in the UK. Sightsavers is governed by a Council of Trustees, who oversees operations whilst delegating day to day management to the management team.

The management team structure consists of a series of leadership groups, covering specific areas. This ensures the right people are involved in the right areas of decision-making i.e. that they have the correct knowledge or skill base and not just levels of seniority. Leadership groups exist for Strategy, Management and Operations, People and, External communications. Core membership consist of cross department directors and managers

Country level management is split into four regions ECSA, West Africa, South Asia and India (which has its own board and CEO), and below this, by country/area. Details of the countries in which we operate are contained within section 2.5 below.

Sightsavers has a number of subsidiary undertakings, established to facilitate alternative fundraising activities in the UK or to expand our fundraising operations and establish a permanent presence overseas. These are:

- Sightsavers (Trading) Limited – UK registered. The key activities of the company are sales of Christmas cards, merchandise and receipt of corporate sponsorship.
- Sightsavers International Inc. (DE) and Sightsavers Inc. (MO) – registered in the USA.
- Sightsavers International (Ireland) – registered in Ireland.
- Sightsavers International (Italia) – registered in Italy.
- Sightsavers Middle East – registered in the UAE
- Sightsavers Sweden – registered in Sweden
- Sightsavers Norway – registered in Norway
- Sightsavers India – registered in India

Each of these entities has a formal legal structure under the relevant country laws including a board of directors or trustees. Sightsavers exercises aspects of financial or programmatic control of these entities by virtue of conditions in their founding documents, or under licensing or management services agreements.

2.4 Location of organisation's headquarters

Sightsavers' head office is located at 35 Perrymount Road, Haywards Heath, West Sussex, RH16 3BW, United Kingdom. The contact telephone number is +44 (0)1444 446600.

2.5 Number of countries where the organisation operates

Sightsavers currently works in 39 countries in Africa, Asia and the Caribbean (see map below). There are regional offices based in Senegal (West Africa), Kenya (East, Central and Southern Africa) and India (for India as a region) with management oversight of the South Asia region reporting directly into the Finance and Performance department. There are country offices in 24 of the countries. Where we do not have an established country office, Sightsavers' staff are embedded with the partner organisation. Sightsavers also has funding and marketing activities based in Ireland, Italy, India, Sweden, the United States and the United Arab Emirates.

Where we work

Legend: Where we have programmes; Regional and support offices

Map labels: Haiti, Antigua, St Lucia, Jamaica, Belize, Guyana, Mali, Burkina Faso, Benin, Senegal, The Gambia, Guinea Bissau, Guinea, Sierra Leone, Liberia, Cote d'Ivoire, Ghana, Togo, Cameroon, Nigeria, Chad, Sudan, Ethiopia, South Sudan, Uganda, Kenya, Tanzania, Democratic Republic of Congo, Zambia, Malawi, Zimbabwe, Mozambique, Pakistan, India, Bangladesh, Sri Lanka

2.6 Nature of ownership and legal form

Sightsavers is the working name of Royal Commonwealth Society for the Blind. Originally founded in 1950, we are now a company incorporated by Royal Charter dated 28 February 1990 as amended on 8 July 2009 (company number RC000706) and are a charity registered in England and Wales (207544) and Scotland (SC038110). Sightsavers is regulated by the UK Charities Commission.

The relationship of Sightsavers and our related entities is complex and varies according to the legal requirements in the respective locations:

- Sightsavers owns the whole of the issued share capital of Sightsavers (Trading) Limited and the taxable profit is gift aided to Sightsavers.
- Sightsavers International Inc. and Sightsavers Inc. are incorporated as non-profit organisations in Delaware and Missouri, USA, respectively. The organisations do not have any capital stock, but the incorporation documents and registration with the US Internal Revenue Service establish that they exist to support Sightsavers.
- Sightsavers International (Ireland), Sightsavers International (Italia), Sightsavers Sweden and Sightsavers Norway are each limited companies registered as charities in their respective countries.
- Sightsavers India is registered as a charitable trust in India
- Sightsavers Italia is a registered non-profit association in Italy.
- Sightsavers Middle East is a marketing company registered in the Dubai Silicon Oasis Freezone and with the International Humanitarian City
- Sightsavers Zambia is a non-stock company wholly owned by Sightsavers and registered as an NGO in Zambia. Apart from its company status, it operates effectively as a branch office in the same manner as our other African country offices.

All other country and regional offices are branches of Sightsavers, and are registered under the laws of their respective country of operation.

2.7 Target audience and affected stakeholders

Sightsavers' beneficiaries are the general population in need of eye health services, people with or at risk from, neglected tropical diseases and people with disabilities. Sightsavers works in developing countries, the precise geographic breakdown of this work is shown on the map in section 2.5, whilst section 2.2 outlines the primary activities undertaken to deliver for our beneficiaries.

Other affected stakeholders include our partner organisations; other NGOs that we collaborate with; donors and supporters and those governments and institutions and organisations that we seek to involve in or influence through our work. These stakeholders are primarily based in the countries in which we operate, but may be located anywhere in the world.

Our stakeholder group includes private sector organisations, supporting in the delivery of our interventions, consortium partners and our strategic alliances and networks.

2.8 Scale of the reporting organisation

As of 31 December 2015, Sightsavers had 463 employees and 40 active volunteers. Our employees are based in each of the locations described in section 2.5 and undertake all functions to allow us to deliver our programmes. Our volunteers are UK based and contribute to fundraising and awareness raising activity in their local communities. In addition, we had 158,000 UK, and 32,010 non-UK (excluding Italy and India) individual supporters who made one or more donations in 2015.

A detailed breakdown of Sightsavers' financial results for 2015 can be found in the Annual Report and Accounts, which is published on the website (2015 will be available online from June 2016). In summary, total incoming resources were £198.3m (2014: £187.6m), of which £134.4m (£134.3m) was gifts in kind (primarily the donation of Mectizan ® from Merck and Co. Inc.). Total resources expended were £196.9m (£185.7m), split primarily between costs of generating funds £17.5m (£14.6m) and charitable activities £179.3m (£170.5m). Sightsavers' net assets at 31 December 2015 were £13.3m. This is the net of £22.9m assets and £9.6m liabilities.

In 2015, Sightsavers operated over 150 projects. These supported many millions of beneficiaries (12,712,812 people examined and 334,156 operations performed) and full details of our output statistics can be found in the annual report and accounts. In 2015, we supported the distribution of 141,998,557 NTD treatments.

2.9 Significant changes during the reporting period regarding size, structure, governance or ownership

Significant changes that occurred during the reporting period relating to size, structure and governance of the organisation are as follows:

- SIM card - Following the SIM card indicator review, data was collected for 2014 which served as a baseline for setting targets for the remainder of the current strategic period (2015 – 2018). Full year data for 2015 shows 84% of lag indicators either on or approaching target. The SIM card dashboard is published on our website at the following link http://www.sightsavers.org/about-us/governance/how-we-measure-our-progress/

- A new Chair, Martin Dinham, took over in July 2015. With Lord Nigel Crisp becoming Vice Chair for his last year of tenure. Martin also sits on Sightsavers' governance and remuneration committees, and is a member of the Programme Expert Group (advisory).
- The departure of our Director of Strategic Communications in September 2015 led to a restructure of our Communications department. The new structure has led to the communications function being embedded within specific departments, ensuring resources remain as close to the business as possible, enabling those who are focused on delivering the strategy (as set out in our SIM card) to be most effective. Embedded communications within departments will allow employees in this area to increase their knowledge and enable them to better support delivery.
- The HR structure transitioned from having a designated HR department to adopting an embedded HR structure, to better align provision of support with the operational needs of the business (described in more detail under indicator NGO9). This change has seen the recruitment of two HR Business Partners, one based in the Policy and Programme Strategy department (also supporting NTDs and Global Fundraising teams) and one reporting into Finance and Performance (also supporting our overseas offices). The primary function of the Business Partners is to provide HR expertise and knowledge to their specific departments. The HR operations team now reports into the Finance and Performance department. This team provides the first point of contact for any day to day and high volume employee queries as well as supporting the HR Business Partners as they deliver the overall HR service into the directorates.
- Our Empowerment and Inclusion framework was launched in June 2015 and rolled out across the organisation at the Annual Meeting. This strategic framework clarifies what disability inclusion means for Sightsavers and sets out how we can embed it throughout our organisation. The strategy is described in more detail under indicator NGO4.
- The strategic alignment process in 2014 provided an opportunity to review our project design processes and a new framework was launched in 2015. The project Design Process (PDP) is to establish a framework for project conceptualisation and design, as well as a set of minimum requirements that a project must meet before it moves to implementation. The PDP also aims to identify the roles and responsibilities of global and country level teams at each stage of the process to ensure joint ownership and accountability. This process is further detailed under indicator NGO1
- The Programme Portal was rolled out in January 2015. This development signified an important shift in the organization's reporting as it moved from annual to quarterly reporting. Quarterly reporting allows the organization to pro-actively respond to challenges, share best practice and manage risk.
- We initiated a strategic alignment process focused on our NTD portfolio, which aimed at reviewing our core NTD programme to understand where each project currently is in relation to the elimination agenda for each country. This process was undertaken to ensure we were targeting available funds in the most effective way. The result of this process also highlighted gaps in our portfolio so that any future increases in grant funding for NTDs could be targeted effectively.
- We brought together our three websites into a single website at the end of 2015, and have been working on developing resilience in our e-commerce area. The whole area of cyber security will be a big focus for 2016 as it is a growing risk to organisations across the globe.

2.10 Awards received in the reporting period

During the reporting period, Sightsavers won 2 awards relating to our direct marketing fundraising activities, specifically the Million Miracles campaign. They were awarded by the Institute of Fundraising.

- Best Use of Digital Fundraising
- Most Powerful Insight from Traditional Methods of Data Analysis

3.   Report Parameters

3.1 Reporting period for information provided

The reporting period is the calendar year 2015

3.2 Date of most recent previous report

The most recent report was produced for the calendar year 2014

3.3 Reporting cycle

Sightsavers has moved to bi-annual reporting following recommendation from the Independent Review Panel in the 2013 report feedback letter and submit full reports on a biennial basis. Summary reports are submitted for interim years, detailing any material changes that have occurred within the organisation during the reporting period, as well as progress updates against the areas identified by the Panel in the Improvement Analysis document.

3.4 Contact person for questions regarding the report or its contents

Questions regarding the report or its contents should be directed to Alicia Cummins, Head of PS2 Operations and Planning, at the head office address.

3.5 Process for defining report content and using reporting process

This report has been developed in alignment with the Accountability Charter reporting guidelines, based on the GRI NGO Sector Supplement 3.0 Level C template

The report has been produced with contributions from various functions within the organisation including, HR, Global Fundraising, Finance and Performance, Research and Evidence, Programme Systems, Policy and Advocacy and the NTD teams.
This ensures accountability is embedded within the organisation to deliver against areas of commitment highlighted in the report.

The report is circulated internally within the organisation together with the feedback received from the Independent review panel. The transparency working group, set up in 2014, meets quarterly to track and ensure efforts to engage with transparency and accountability initiatives within the organisation are joined up and disseminated. Membership of this working group represents both programme and finance and operations departments with the aim of strengthening cross organisational understanding of transparency and accountability and to embed it into policy and practice.

We make this report publicly available through the governance section on our website (http://www.sightsavers.org/about-us/governance/) and believe it also has the capacity to be an additional mechanism for our beneficiaries, partners and key stakeholders to hold us to account.

3.6 Boundary of the report

The report covers activities of all associated entities listed in section 2.3 above. We are party to one partnership agreement, and that entity is not included within this report. It is a partnership called WillAid with a group of UK charities to undertake fund-raising around the creation of legal wills by solicitors

3.7 Material content limitations of the report

The only material content limitations of the report relate to indicator EN16. At present the systems do not exist to allow reporting on carbon emissions relating to energy usage by offices outside of the UK.

3.8 Basis for reporting on national entities, joint ventures, subsidiaries, outsourced operations, or other entities

As described in section 3.6, Sightsavers has included the activities of subsidiaries within the boundary for reporting purposes. These entities operate integrally with the core organisation, so their reporting for this report and their performance reported are equally integrated.

3.11 Significant changes from previous reporting periods in the scope, time frame, boundary, or measurement methods applied in the report.

As outlined in section 3.3 Reporting Cycle, Sightsavers submits full reports on a biennial basis. The scope of these reports is aligned with the reporting guidelines that were updated by The Charter in May 2014.

4.   Governance Structure and Key Stakeholders

4.1 Governance structure and decision making process at governance level

Sightsavers has a governing Council of Trustees which consists of 15 trustees. The Council is committed to maintaining a high standard of corporate governance. Details of our trustees can be found on our website. Sightsavers' governance structure is conceived and managed to allow us to be highly flexible and responsive to changing conditions, whilst conforming all operations to an over-arching vision and mission. The Council has global authority for the organisational strategy, which is implemented by our staff. All of our charitable services are performed in developing countries where programme management is structured on a branch office basis.

Authority is delegated through the Project Design Process and a Financial Policy and Control Framework, which are under regular review by the charity trustees. The directors of regional and country offices report to senior management at headquarters. Independence from specific governments, political parties and the business sector are assured by employing performance indicators that focus our work, and the expectations of our partners, on our global mission.

We raise funds or engage in informational marketing in Europe, the Middle East, India and the United States. In these countries, charitable or non-profit organisations with independent boards of directors operate under the Sightsavers brand through licensing and management agreements.

There are clear distinctions between the roles of Council and the leadership teams, to which day to day management is delegated. Matters such as policy and strategic plans are prepared by them for consideration and approval by Council.

There are four committees of Council: Audit monitors, audit activities, risk and control framework and process effectiveness; Investment monitors, investment performance and

treasury activities; Remuneration monitors remuneration policy and key salary decisions; and Governance advises on overall governance structure, monitors legal and registration issues in the countries where Sightsavers operates and advises on the appointment of trustees and honorary officers. Committees may include specialists who are not members of the Council but who volunteer to use their expertise to assist the committees on an on-going basis. Risk management and the maintenance of the risk register is the direct responsibility of the Chief Executive reporting into Council. The senior management group and Audit Committee, respectively, review and update the risk register on a quarterly basis. All relevant policies, partner contracts and control processes require compliance with relevant laws and regulations.

4.2 Division of powers between the highest governance body and the management and/or executives

The Chair of the Council of Trustees is not an executive officer of Sightsavers. The most senior executive officer within Sightsavers is the Chief Executive, who reports to the Council. As described in section 4.1, the roles of the Council and management team are clearly defined and distinct from one another. In broad terms the trustees are concerned with:

- prescribing the ends
- setting the boundaries of management authority
- monitoring the results

Trustees thus focus on the Society's purpose and what we can reasonably achieve in a given context and time period. Trustees set the parameters, policies and values within which management and staff are free to act. Once the parameters are set, employees are empowered to make reasonable judgements about planning and organising the work to achieve the agreed aims. The trustees' role is then to monitor performance. They have their own version of the SIM card, which is based on the roles and responsibilities of trustees as set out by NCVO, and which includes KPIs which assist in performance management.

The trustees look to management for high quality, well informed advice on which to base decisions about the organisation's objectives, evaluation processes and the like. Management rely on the trustees to provide objective and challenging feedback from a non-executive perspective. This interdependence between trustees and management recognises the fact that while trustees are legally responsible for the charity's activities, both trustees and senior management are morally responsible for the way in which the Society conducts itself.

4.3 The number of members of the highest governance body who are independent and non-executive.

There are currently 15 members of the Council of Trustees, all of whom are independent.

4.4 Mechanisms for internal stakeholders to provide recommendations or direction to the highest governance body.

Sightsavers key internal stakeholders are employees and volunteers. We do not have established formal mechanisms for employees below executive level to provide recommendations or direction to the Council of Trustees. Opportunities are provided by informal opportunities to meet, with employees often attending and presenting at board meetings and awaydays.

Formal mechanisms do exist for employees to provide recommendations and direction to the Strategic Management Team. An employee survey is held every two years that examines the relationship of employees with the organisation and the senior directors. The 2015 survey reported a 97% overall response rate, which is the same level as 2013. Responses to questions relating to confidence in Sightsavers leadership, including trustees were all above 75% and all increases in positive responses in comparison to 2013. Additionally, 69% of staff who completed the survey agreed that 'The organisation practises open and honest communication and shares information and that information sharing systems in the organisation are effective'.

Volunteers do not have a direct mechanism to provide feedback to the highest governance body, but are encouraged to provide feedback after each completed engagement. During this informal process, we encourage volunteers to provide comments on any aspect of their experience.

4.5 Compensation for members of highest governance body

Sightsavers' principle on remuneration is to ensure the reward package is competitive with other equivalent organisations in the areas where it works (both geographically and by type of role), so it is able to attract and retain staff. We see our ability to recruit and retain key staff as fundamental and it is a key organisational risk. Salaries are compared across other INGOs and, where appropriate, other types of organisations, and we look at medians as the basis of pay. This is not rigid as there are times when there is a need to offer more, and times when an individual is still growing into a role so less is offered. A number of different survey providers are used and, where appropriate, a direct comparison with other similar NGOs is undertaken. The remuneration committee sets the salary for the Chief Executive, approves the salaries of her direct reports and the overall reward structure and policy. Our audited and published Annual Report and Financial Accounts provide a breakdown of salary levels as required by the SORP. http://www.sightsavers.org/about-us/governance/annual-accounts/)

4.6 Conflicts of interest for governing bodies

Sightsavers has the following mechanisms and processes in place to ensure that conflicts of interest for governing bodies are identified and managed responsibly:

- Registers of interest and meeting declarations of conflicts - The Council of Trustees maintains a register of declarations of interests and related parties that is updated each year. At each Council or committee meeting, a regular agenda item is the declaration of interests that any member may have with respect to any matter on that meeting's agenda.
- Code of conduct - Sightsavers employees and Trustees are required to comply with the organisation's code of conduct and related policies
- The Council of Trustees has a Conflict of Interest policy and a Related Party Transactions policy. These are reviewed by the Trustees annually.

4.10 Process to support the highest governance body's own performance

Council members, all of whom are wholly non-executive, are drawn from diverse, international backgrounds and bring a broad range of relevant experience and skills to Council discussions. Trustees are elected to Council by other trustees for a maximum total term of eight years (they must be re-elected after the first term of four years). All trustees attend an induction programme to familiarise themselves with their statutory responsibilities, their role within the Council, the governance framework and Sightsavers' objectives.

The Council of Trustees evaluates itself typically every other year. The evaluation does not cover the Council's economic, environmental, and social performance separately from that of the organisation as a whole. Sightsavers has an extensive and highly advanced programme and outcome measurement system; the determinants and review of which are the direct responsibility of the Council.   Individual trustees are evaluated by the Chair and Vice Chair every two years.

Trustees serve up to two terms of four years each. No trustee has been dismissed from the Council, but the governing documents provide a process to do so for a range of reasons. The Council appoints new trustees from time to time as trustees reach the end of their terms. The process for appointment may involve advertising, consultant search, and other forms of candidate recruitment, and includes interviews and consideration by the Governance Committee prior to Council appointment. There are currently 15 trustees.

4.12. Externally developed environmental or social charters, principles or other initiatives to which the organisation subscribes.
Sightsavers subscribes to or endorses the following external charters/principles:
- INGO Accountability Charter - we became a member of the charter in 2011 and have submitted annual reports since that year. Our CEO Caroline Harper is Vice Chair of the board.
- International Aid Transparency Initiative (IATI) – we have published to the voluntary IATI registry on our activities from 2012 and now publish quarterly.
- People in Aid (PIA) - Sightsavers joined the voluntary PIA Code of Good Practice in 2006 and were awarded the PIA Quality Mark in 2009.
- Fundraising Standards Board (FRSB) – we have been a member of FRSB since 2007. Membership is voluntary and requires compliance with a code of conduct with respect to accountability and transparency to donors and regulatory bodies, and implementation of a formal complaints process.

4.14 Stakeholder groups engaged by the organisation
Sightsavers engages both internal and external stakeholders to achieve the strategic objectives of the organisation. Internal stakeholder groups and the mechanisms for engaging them are discussed in section 4.4. The external stakeholders groups are identified below.

Our external stakeholders include those partner organisations we work with to deliver programmes (including local and international civil society, government ministries and the private sector) and those agencies, networks and institutions working in health, eye health, education, social inclusion and development more broadly; with whom we collaborates in programmes, in research, in advocacy and in procurement.

Sightsavers external stakeholders also include those individuals and organisations that fund or are prospective funders of our work and those organisations that regulate Sightsavers in the UK or elsewhere. Most importantly, our stakeholders also include those women and men, girls and boys, who are blind, have low vision or are at risk of becoming so.

4.15 Identification, selection and prioritisation of key stakeholder groups
Our Programme Partnership Policy sets out the principles behind our approach to partnership and how these are operated in practice. This policy defines multiple stages of partnership, including "Exploration", which sets out how an initial interest is identified and what minimum criteria we apply in the selection of partners. Specifically, the policy

guidelines outline certain situations in which Sightsavers will not enter into partnership with an organisation. We track the development of our partnerships in line with the policy and use internally developed tools to assess the capacity and financial competence of partners. In 2015, to accompany the Partnership Policy, a Partnership Framework was developed. Designed to mirror and align with the project life-cycle, the framework and tools ensure that appropriate implementing partners are selected. In addition, detailed situation analysis is conducted through the project design process (PDP) and identifies key stakeholders at the national level which need to be prioritised for engagement during project design and implementation.

Our Research Strategy, launched in 2015, sets out the governance principles for all research activities that we support and provides guidance to staff, consultants and partners on the entire research process; including conceptualisation, design, partner selection, implementation, analysis and dissemination.

Our donors are actively solicited from the general public in the UK and the rest of the world, particularly Ireland, Sweden, Italy and the United States. Our Global Fundraising and Donations Acceptance policy was developed in 2015 (and agreed by Council in March 2016, see indicator PR6 for more information) and, along with our Money Laundering Policy, sets out the key issues to be considered in accepting a donation from an individual, corporation or foundation. The engagement with corporate donors specifically is also governed by our Corporate Engagement Policy. We also solicit and accept donations from governmental and institutional funders. Engagement with these donors is considered on a case by case basis.

Our engagement with women and men, girls and boys, arises from the circumstances of the programmes supported and our role and that of our partners, and flows largely from the decisions made with respect to the partners with who we collaborate.

I.   Programme Effectiveness

NGO1 Involvement of affected stakeholder groups in the design, implementation, monitoring and evaluation of policies and programmes

Sightsavers SIM card remains the central tool used to track involvement of affected stakeholder groups in the design, implementation and evaluation of our policies and programmes. Sightsavers ultimate aims focus on sustainability, government ownership and empowerment of people with disabilities to participate equally in society Organisational objectives at beneficiary level have been developed across the thematic areas in which we work, whilst objectives focused on effective partnerships, advocacy and strategic alliances describe what we need to excel at as an organisation in order to deliver for our beneficiaries. In addition to the SIM card, internal policies and procedures govern how we engage with our different stakeholder groups, including the Partnership Policy and Framework (NGO6) where feedback from partners helped shaped the due diligence tools, Global Fundraising and Donations Acceptance Policy (PR6), Complaints Handling Mechanism (NGO2), Policy Development Guide (NGO5), all of which are described in detail under relevant sections of this report.

Sightsavers' thematic strategies in eye health (2013), Education (2014) Empowerment and Inclusion (2015), and Research (2015) (available on our website http://www.sightsavers.org/policy-and-research/) set out our programmatic approaches which will lead to achievement of our strategic aims. Introduction of the thematic strategies, coupled with the organisational restructure in 2013, has placed responsibility of programme design with Global Technical Leads (responsible for thematic strategy and

strategic direction of global portfolio) and country teams, with emphasis on co-design and co-accountability. Implementation of projects is led by country teams, with the various functions from across the Finance and Performance and Policy and Programme Strategy teams, supporting both design and implementation of projects.

The strategic alignment process in 2014 provided an opportunity for the organisation to review its project design and implementation frameworks. The Project Design Process (attached as an annex to this report) was launched in 2015 and places emphasis on project design being critical to address how projects will be implemented, how results will be monitored and measured and how learning from successes and challenges will be achieved.

Partner involvement in project design begins at context analysis and concept stage, where key stakeholders are mapped and engagement begins. In accordance with the thematic strategies, projects align with national government plans (where available) and a crucial stage of context analysis is scoping out the policy context in order to develop advocacy objectives, linked to the thematic theories of change. Means of verification within the Project Cycle Management and Thematic Quality Standards Assessment Tools require representative stakeholders, including beneficiaries, to be invited to participate in project design. (Available on IAPB website https://iapblive.blob.core.windows.net/resources/69_2014-Quality-standards-manual_defining-minimum-effective-practice-for-Sightsavers-supported-programmes.pdf?width=150&height=150). This structure and delivery system has seen positive results:

- Increased ownership and buy in from partner, country and regional teams at design and implementation of projects
- Shared global understanding of direction of the global programme portfolio and project specific goals
- Opportunities for learning on specific programmatic themes/systems
- Improved quality of reporting and documentation of evidence and learning.

Strategic review and decision making on the direction of the portfolio is managed by the Reflection, Oversight, Analysis and Review (ROAR) group. The purpose of this group, which meets quarterly is to review and analyse the multiple sources of evidence generated by our programmes and use these to assess progress against implementation of the thematic (eye health, social inclusion, education) and technical (e.g. research, influencing) programme strategies and agree the shape of the future programme portfolio. The group will use a variety of data sources (QSATs, SIM data, research articles, evaluations, output statistics, annual reports etc.) to undertake this assessment. ROAR also provides a top-level mechanism for programme accountability and delivery assurance, providing a support function to the Strategy leadership group and the Programme Expert Group led by the Chairman.

In our Neglected Tropical Disease work, one of the primary approaches we have developed alongside governments, and which is now globally adopted, is the Community-Directed Treatment approach. The central theory behind this approach is that communities themselves are the best-placed to judge how to effectively reach the treatment targets set by the WHO for NTDs. Community distributors, who are trained and provided with the tools required, work with community leaders and primary health care workers to develop and implement plans for regular Mass Drug Administration. The effectiveness of this approach in the huge reduction in transmission of onchocerciasis in

many countries, is well-documented. It is a clear and leading global example of community leadership in public health programmes.

In 2015, we replicated the participatory research project Voices of the Marginalised (previously carried out in Bangladesh, with IDS, HelpAge International, ADD and Alzheimer's International) in Tanzania. The study uses community based participatory research methods to understand what people with disabilities experience in their daily lives and unpick the myriad of factors contributing to their personal circumstances. The study highlighted that daily life for people with disabilities is complex, with participants routinely experiencing stigma and discrimination, but also empowerment. The findings of this research come at a crucial time when governments are looking into how they will universally implement the 2030 Agenda.

Finally, over the reporting period we have continued to work closely with several umbrella bodies of disability organisations, including sitting on the board of , the International Disability and Development Consortium, have an increasingly close partnership with the International Disability Alliance, as well as working with individual INGOs UK working in our sectors based disability organisations. This has proved to be an effective way of capturing the views of affected stakeholders in making submissions to policy consultations.

NGO2 Mechanisms for feedback and complaints in relation to programs and policies in response to policy breaches

Sightsavers' Complaints Policy is now fully operational and a direct link has been established between our complaints policy and our internal control and assurance mechanisms. Complaints that are received, both internally and externally, now influence our approach to assurance and are featured in our audit programme. Testing has been incorporated into internal audits to ensure that operational changes in response to complaints are adequate in order to mitigate future grievances. There are plans to audit the complaints policy and procedures structure in 2017

The complaints Policy is made available on the 'Governance' and 'contact us' sections of our website (http://www.sightsavers.org/about-us/governance/) and a dedicated area on the organisation's internal intranet has been developed for employees to engage with, which includes the Global Complaints Policy. The complaints policy and procedure forms part of core employee induction and the internal roll out has ensured that all staff are aware of its existence. Guidance procedures on how to handle complaints and process documentation to be completed when a complaint arises is available on our intranet. The policy is supported by an internal Complaints Handling Procedure, which provides staff with practical guidance on how to implement the policy.

This includes how to identify legitimate complaints under the Policy and how to identify those which are not relevant or are vexatious. Full details of when Sightsavers will not respond to a complaint are included in the Policy. We have not placed a restriction on the way in which complaints may be made but, once received, all will be managed through the same process. This includes reporting of the complaint to a central administrative team who monitor the progress in responding to the complaint and maintain a central record of all complaints received. The responsibility for responding to complaints sits with the relevant line director, with the possibility for escalation to the CEO, Chair of Trustees or relevant external bodies if necessary. We have committed to acknowledging complaints within 14 days and responding within 30 days.

Our current mechanism for consolidating complaints received at country office level is managed by our Corporate Services team. Country Offices submit a quarterly complaints return and during the reporting period no complaints were received. A review of the country level complaints mechanism has been added to the 2016 internal audit programme to assess whether the current process is robust and providing accurate data. In relation to complaints at partner level our Partnership Due Diligence tool and Thematic Quality standards require implementing partners to have adequate policies and protocols in operation which allow beneficiaries to provide feedback on services.

As previously reported, we have two formal mechanisms in place for internal stakeholders to raise issues which are the Grievance Policy and the Whistle-Blowing Policy. Under these policies, employees are protected from any victimisation or discrimination as a result of their disclosure, provided they act in accordance with the policy. All complaints raised through these two procedures are escalated to the HR Business Partners or the CEO. Employees may also email direct to a dedicated email address. During the reporting period one internal complaint was made through the grievance process. Through implementation of the grievance policy the complaint was resolved satisfactorily and further evidences that the policy is both well known by employees and fit for purpose. A Complaints mechanism is also included within the child protection policy, which is being updated in 2016 and further information is provided under indicator SO1.

Details of the complaints process and types of complaints received in relation to fundraising activities are provided under indicator PR6.
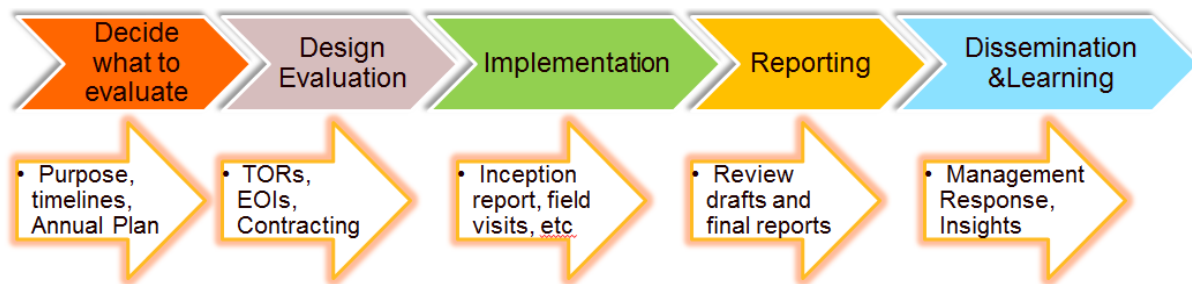
NGO3 System for program monitoring, evaluation and learning
Globally, all programmes are monitored using our Strategy Implementation Monitoring (SIM) card and our programme portal. All individual projects within Sightsavers contribute to our global strategic objectives and our M&E approach roots the organisation in evidence based decision making allowing us to identify gaps and learn and adapt in response to the challenges and achievements experienced during programme implementation. Enabling us to assess high level outcome and impact results, ask ourselves the right questions and build institutional knowledge based on evidence and learning, this framework ensures we remain accountable to our beneficiaries, partners and donors. Our M&E framework (attached as an annex to this report) is inclusive, participatory and transparent. Operating on both a project and organisational level, M&E has been integrated into the three key parts of project cycle management: design, inception & implementation and evaluation & project close out. Standardised tools, guidance and systems are in place to support the creation and implementation of project M&E frameworks. Throughout the reporting period all projects continued to be designed and monitored using the logical framework approach.

The Programme Portal system was launched in January 2015 to coincide with the annual output statistic reporting process. A series of regional training sessions were conducted in country and the organisation has now moved to quarterly dating reporting for all service delivery indicators. This change in reporting frequency and format has led to improved targeted controls and quality of data. The system is user friendly and can be accessed by staff globally. Its reporting function has greatly improved the availability of easily accessible project level data and it has also increased our ability to analyse our data, for example to disaggregate by gender and age nd take an overview on the impact of our programme on women and men, girls and boys.

Output statistics are a key method of tracking the implementation of Sightsavers' project work. They are collated and published at an organisational level and are also used internally to monitor the progress of projects. Output statistics provide key data on performance and enable us to ask key organisational performance questions, it is vital that the output statistics are accurate and verifiable.

Evaluations are conducted as a systematic, impartial and objective assessment of our projects, in order to generate insightful, credible information that can be used to inform decision-making, future planning, and to report on and communicate results and achievements. Our evaluations team supports the commissioning and delivery of robust and meaningful evaluations, working to ensure the active use of evaluations to inform our work, improve project design and lead to wider learning.

Decide what to evaluate	Design Evaluation	Implementation	Reporting	Dissemination &Learning
• Purpose, timelines, Annual Plan	• TORs, EOIs, Contracting	• Inception report, field visits, etc	• Review drafts and final reports	• Management Response, Insights

Sightsavers evaluations criteria include the 5 DAC criteria and 2 additional Sightsavers criteria *(Relevance, Effectiveness, Efficiency, Impact, Sustainability, Coordination/Coherence, Scalability/Replicability).*

Management responses are developed for all evaluations. Evaluations are currently not published on our website, due to the website redevelopment which occurred at the end of 2015. In 2016 we will again publish all Evaluations and executive summaries on our website. In 2015 for the first time we published an annual summary of all evaluations conducted during the year (attached as an annex to this report). This summary was discussed and approved at the Programme Expert Group and will now also be shared annually with the Sightsavers Ireland board, a good example of improved analysis informing management and governance level discussion and decision-making. We already have an internal evaluations page on our intranet and evaluations and management responses are published externally via IATI, along with other project data including financial information. IATI aims to make information on spending on aid more accessible to governments, organisations and citizens of developing countries. By making this information available and transparent it aims to stimulate effective partnerships and increase ownership and accountability. http://d-portal.org/ctrack.html?publisher=GB-CHC-207544&tongue=eng#view=publisher

We continue to learn using various approaches such as, research and learning seminars and specific learning events held globally or in our regions. In 2015 we held our first reflection workshop which focused on refractive error and aimed to consolidate learning and experience from across our projects in this technical area. The workshop determined Sightsavers' key principles in refractive error and school screening, which provide overarching guidance as well as key principles. The workshop also produced a finalised sustainability statement. A learning event focused on education and social inclusion approaches was also held in West Africa in September 2015.

Teams also use appropriate approaches in line with our quality standards on learning. Externally, the organisation continued to engage with the rest of the sector through

various forums to share its learning, including presentation at webinars and international Conferences, Publications in peer-review journals and improvement of our learning and research pages as part of the website redevelopment.

NGO4 Measures to integrate gender and diversity into program design, implementation, and the monitoring, evaluation, and learning cycle

The most important achievement in 2015 is the launch of our empowerment and Inclusion Strategic Framework. This key document provides our framework on social inclusion and identifies our main areas of future work. It explains our rights-based approach of mainstreaming disability throughout our programming and operations, and it also explains our aim to support targeted interventions which redress the inequalities experienced by people with disabilities in the countries where we work. Programmatic objectives under this strategy focus on; mainstreaming inclusion - through our health, education and NTD projects; empowerment of women and men with disabilities – through voice, agency and participation, addressing stigma and discrimination and economic empowerment; and cross cutting objectives focusing on equal rights for women and girls with disabilities.

Gender and diversity dynamics are central components of the new project design process and require articulation of how gender and disability will be included and strengthened as part of project implementation and the longer term sustainability of our work. We will continue to explore what level of engagement we can effectively have with other marginalised groups, but our focus in the short to medium term will be on gender and disability.

Sightsavers also considers issues of gender and diversity in programme monitoring with all projects reporting disaggregated output data by gender. To achieve this we work with our partners to ensure adequate systems are in place to collect this information within our projects. The project portal requires disaggregated targets and results to be input and the reporting tool allows disaggregated data to be visualised and reported on, helping to measure the impact of programmes on beneficiaries of different diversity groups.

As reported in 2013, Sightsavers, in 2014, launched a pilot project to test disaggregating data by disability in India and, in 2015, in Tanzania. Aiming to address a globally identified gap in availability of accurate and comparable data on disability , the purpose of these projects is to understand what does and doesn't work and to share learning and evidence in the wider development sector. We have consolidated experience and learning which has been disseminated through reports, policy briefs and presentations at international conferences and meetings including those hosted by UN agencies, which focus on global data and methodologies for collection. We are sharing our experiences with the agencies who are responsible for developing methodologies for measuring the SDGs and are members of the UN's Global Network on Monitoring and Evaluation on Disability in Development. More information on these projects can be found on our website http://www.sightsavers.org/everybodycounts/

The Empowerment and Inclusion framework includes an objective to scale up efforts to achieve diversity in the workplace and approaches to set about reaching this goal is explained as part of performance indicator LA13.

Finally, an outcome of our SIM card indicator review in 2014 was the introduction of new indicators assessing projects with clearly defined strategies to improve access by people with disabilities and to reach a higher number of females than males. Data reported

against these indicators showed over achievement of set targets for the baseline year and work will be carried out in 2016 to ensure future targets remain ambitious and meaningful to achieving our strategic ultimate aims.

NGO5 Processes to formulate, communicate, implement, and change advocacy positions and public awareness campaigns

As reported in 2014, Sightsavers has in place a developed sign off process for developing policy, which is managed by the Policy and Global Advocacy Directorate (PGA). We aim to ensure that our policy and advocacy work is consistently of a high standard and informed by research and evidence, both, from within the organisation and from outside. To ensure continued consistency in this area the Policy Development Guide (attached as an annex to this report) aims at promoting good practice in policy development. The guide seeks to draw a closer link between the policy change desired (the intended outcome) and the policy paper (the output). This in turn should enable the organisation to meet its SIM card objective, of delivering effective joined-up advocacy, more effectively. Our SIM card indicator '% of Policy and Global Advocacy objectives which have demonstrated significant progress in annual self-assessment' allows us to track progress against set objectives and results for the reporting period show 83% achievement against a target of 80%

It is critical that our relevant policy and advocacy positions on social inclusion accurately reflect the experiences of people with disabilities. The Voices of the Marginalised pilot project (described under indicator NGO1) has been carried out in Bangladesh and Tanzania. This participatory research project (achieved in collaboration with HelpAge International, ADD International) draws on the real-life stories of people with disabilities and older people in Bangladesh and Tanzania, providing valuable testimony of the considerable equality and poverty challenges they face. The recommendations made by the participants have been reflected in multiple policy activities with the objective to ultimately "leave no one behind" as agreed in the 2030 agenda.

In terms of corrective adjustments, in 2015, we undertook an evaluation with the purpose of assessing the effectiveness and achievement of Sightsavers' Put Us in The Picture campaign in a way that provides robust analysis of the policy outcomes associated with the campaign and Sightsavers' contribution to them. The evaluation has been completed and provides key findings and recommendations which have been incorporated into planning the policy, political and public facing aspects of phase two of the campaign. A summary document is currently being prepared for publication on our website. No corrective adjustments have taken place in 2015. Our 10 year campaign vision sets out our goals for this time period. As part of this plan we will develop an exit strategy for our campaign work however this process has not yet been initiated.

We remain committed to ensuring that our public voice is fair, balanced, evidence-based and in accordance with our vision, mission and objectives. Significant strategic importance is placed on the quality of research and evidence and in disability, where there is a clear paucity of global, regional and national level data, care is taken to use verifiable sources. This means that our voice, where we do make public criticisms, reflects the known evidence. The development of the Policy Development Guide, as highlighted above, will further strengthen stakeholder engagement and scrutiny in this area.

Finally, our policy positions are published on our website and internal intranet (http://www.sightsavers.org/policy-and-research/). In the UK, policy positions are

disseminated to key targets in Westminster and Whitehall and used as a basis for additional briefings (for example to brief MPs or Peers in advance of relevant Parliamentary debates). At international level, policy and advocacy materials are disseminated to a range of other critical advocacy targets including, but not restricted to, governments in the countries where we work, UN agencies, bi-lateral and multilateral agencies, the World Health Organisation, other Non-Governmental Organisations and Disabled People's Organisations.

NGO6 Processes to take into account and coordinate with the activities of other actors

Engaging with and leveraging our strategic networks and alliances is a strategic priority for Sightsavers. Our SIM card indicator in this area allows us to monitor progress against agreed goals and objectives for each of our strategic alliances in the areas of eye health, NTDs, education and social inclusion. In 2015 we reported 83% of alliances where progress towards reaching these goals and objectives has been achieved, against a target of 80%. Sightsavers Programme Partnership Policy sets out the principles behind our approach to partnership and how these are operated in practice. We are committed to developing relationships where the partner organisations can collaborate beyond programme work, both formally and informally. With increasing complexity within our partnership network, partners can be categorised into:
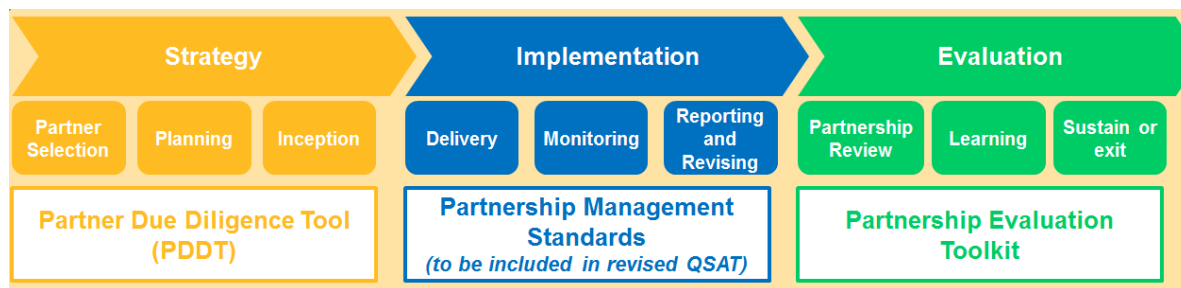 1. Global strategic alliances
 2. International programme partnerships
 3. Implementing project partnerships

Our global strategic alliances include international bodies and professional associations that we actively support to coordinate efforts to influence change and share learning. Our international programme partnerships directly support programmatic work through co-design, learning, and support to implementation.

Our implementing partners include local NGOs, CBOs and government ministries, in the countries where we work. These partners are involved in all aspects of project design, implementation, and monitoring/evaluation. We aim to increase the capacity of our partners to deliver sustainable programmes through supporting training, processes, and infrastructure development where needs are identified. We believe that strengthening partner capacity will support the sustainability of the programmes after the financial support from Sightsavers has ended.

During the reporting period we have been working to improve our evidence-base to demonstrate that the partners have the increased capacity to sustain programme activities. As described under indicator SO1, we have taken key learnings from our 2013 & 2014 strategic alignment process and rolled out a comprehensive project exit process, incorporating tools and guidance for risk assessment and financial management, as well as have a more systematic approach to building sustainability into project design from the outset. We have also gained learning and experience from the Sri Lanka country withdrawal process, also described in more detail under indicator SO1.

In 2015, to accompany the Partnership Policy, a partnership framework was developed and rolled out. Designed to mirror and align with the project life-cycle, the framework outlines the three key stages that the majority of programme partnerships will progress through.

Strategy	Implementation	Evaluation
Partner Selection · Planning · Inception	Delivery · Monitoring · Reporting and Revising	Partnership Review · Learning · Sustain or exit
Partner Due Diligence Tool (PDDT)	Partnership Management Standards (to be included in revised QSAT)	Partnership Evaluation Toolkit

This framework helps ensure that we develop appropriate partnerships, that the project is properly planned and implemented, that performance is monitored against agreed key measures, and that a regular review of the partnership's performance is undertaken to take stock of learning and make decisions about its future. Through partnership due diligence and quality standard tools we assess capacity with the partner organisations in order for both parties to understand their strengths and weaknesses and how these will affect delivery of the projects. The due diligence tool was piloted with partners in 3 regions and feedback was collated from both partners and the country office team which identified areas for change and improvement and fed into the finalised version.

A series of tools support the three phases of the framework.
- Partner Due Diligence tool (PDDT) - a comprehensive tool that enables assessment and baselining of partners for capacity (human resources, project management, safety & protocols, infrastructure etc.), strength of financial frameworks and accounting mechanisms and partner credibility and track record assessment. There is a light touch and in-depth version for Government partners, BPO/DPO or other community- based organisations and National NGO/international NGO/private sector organisations. Results of this assessment are linked to project design criteria so that capacity needs of partners can be considered and planned for within a project.
- A new Partnership module will be added to the QSAT tool - to enable ongoing assessment of partner strengths and weaknesses, following the baseline assessment carried out in the PDDT.
- Partnership review survey - a short survey focusing on the relationship and collaboration between the partners based on the seven Partnership Principles.
- Partnership Learning Capture: captures important learnings from the partnership such as key success factors, challenges and lessons learnt for future initiatives
- Exit Planning toolkit: Includes tools and templates including exit planning guidelines, exit checklist, risk assessment template partner communication guidelines

II.   Financial Management

NGO7 Resource allocation, tracking and control
Sightsavers continues to maintain the strong resource allocation and financial control framework that was mapped out in detail in our 2013 report. It remains a multifaceted approach incorporating: governance; organisational structure; appropriately skilled, qualified, accountable and supervised managers and staff; documented corporate policies, established internal procedures and processes and external monitoring including audit.

With regards resource allocation, we have continued to strengthen our processes so that allocations are increasingly driven by strategic priorities. We undertook the strategic alignment process in 2014 resulting in the closure of a number of projects, and the

development of a range of new programmes and projects, designed to further the achievement of strategic objectives. Structural changes in the organisation were made to underpin this drive to strengthen programmatic strategic alignment. Programme development and resource allocation was separated from existing programme implementation so that decisions taken on programme priorities for the future and subsequent funding could be made from an organisational perspective rather than being driven by the programmatic status quo within specific countries or regions. Thematic strategies for eye care, social inclusion and education have been developed to provide frameworks for this strategic decision making.

Formal structures have been built to guide the process. Technical experts identify thematic gaps and opportunities and work with country teams to develop programme responses. A strategic decision making body (the ROAR group described under indicator NGO1) meets quarterly to review the options put forward and decide which can move forward to implementation. Resources allocations for programmatic activity made during the annual planning process flow directly from this review and decision making.

We continue to use our balanced score card (the SIM Card) to track overall organisational strategic performance and feed any performance issues back into the process. As reported in 2014, we felt that some of the indicators being used to track objectives were no longer providing us with appropriate insight. We subsequently reviewed objectives and indicators, replacing some and refreshing and tightening criteria for others. Our new indicators now provide the insight required to assess performance and influence resource allocation.

We have continued to maintain a focus on value for money and efficiency. Concerns of increasing costs in support functions have been addressed. We have scaled down our regional offices, removing administrative complexity and duplication through the role out of global systems, such as direct financial payments to partners and some suppliers from the central finance team, and have embedded human resource activity within core departments improving performance and saving approximately £250k per year.   The revised HR structure will also save substantial amounts of money.

The main elements of our control environment outlined in our previous report have been maintained and strengthened in a number of ways. We have strengthened our organisational assurance framework, overseen by our Internal Audit Manager. The oversight work carried out by our Regional Finance Managers has been reviewed by Internal Audit and the scope and structure of their work is such that it can be used formally as part of our overall assurance reporting.

We have also implemented a programme database, the Programme Portal, which now provides quarterly reporting of output statistics and enables us to routinely assess progress of both financial and programmatic outputs in tandem. For large grant funded projects we have implemented specific quarterly oversight reporting which brings together key stakeholders to review and assess progress and performance and highlights and addresses programmatic or financial issues.

NGO8 Sources of funding by category

Sightsavers has a strategic objective of growing income, driven by a desire to increase organisational activity and maximise impact. We have historically had high levels of voluntary income from individuals, corporates and trusts, but we have focussed in recent years in investing in capacity to raise and manage institutional funding. This has been

highly successful. As lead agency in wider consortia, we have been awarded a number of significant institutional grants for the implementation of our work in Neglected Tropical Diseases across a number of countries. In total these grants and contracts, funded by DFID and the Queen Elizabeth Diamond Jubilee Trust, amount to over £100m and are playing a significant role in our push for elimination in a number of these diseases including trachoma and onchocerciasis.

Across 2014 and 2015 we have also invested significantly in our capacity to raise voluntary income so that we can continue to benefit from the flexibility that such income provides for the organisation. We have increased activity in core markets, primarily the UK and Ireland, but have also expanded geographically setting up fundraising operations in India, Scandinavia and increasing investment in Italy. Initial returns are promising with growth year on year in each of these markets, though we will continue to assess performance carefully and adjust allocation accordingly.

Overall we continue to see increases year on year with 2015 income at roughly £64 million, up by over £10 million on 2014 levels. We have continued to receive a significant gift in kind from Merck and Co. Inc. in the form of Mectizan ® tablets from Merck and Co. Inc. to treat onchocerciasis and lymphatic filariasis (LF). In 2015 this was valued at £134 million, roughly the same level as in 2014. This put our overall income at roughly £198 million.

From the 2015 Annual Report and Accounts, the categories of income are as follows (along with comparative figures for 2014):

Category	2015 £'000	2014 £'000
Gifts-in-kind	134,467	134,272
Individuals	21,791	21,113
Legacies	9,952	7,262
Incoming resources from charitable activities	21,889	12,895
Grants within voluntary income	5,793	6,361
Companies	1,703	2,077
Trusts	2,244	1,254
Community service and other organisations	261	381
Investment income	172	201
Other	31	1,762

2014 'Other' income included funds generated by the sale of Grosvenor Hall, which was Sightsavers' head office. This income stream did not, therefore, continue in 2015.

The largest donors and the value of their contribution are as follows (with comparisons for 2014). This excludes Merck and Co. Inc. as their donation is not cash income for Sightsavers:

Donor	2015 £'000	2014 £'000
UK Department for International Development	16,944	10,092
Queen Elizabeth Diamond Jubilee Trust	6,649	4,088
Irish Aid	1,085	1,221
MB Trust	820	820
USAID (via HKI, JSI and RTI)	775	809

		717	1,509
European Commission		717	1,509
Bill and Melinda Gates Foundation		609	0

Please note that these numbers are still to be finalised and formally approved by Sightsavers Board of Trustees. We are not expecting any significant change but, if there is some movement we will update our report prior to final external publication

III.   Environmental Management

EN16 Total direct and indirect greenhouse gas emissions by weight at the organisational level

Please note: we have followed the Department for Environment, Food and Rural Affairs (DEFRA) guidance on how to report on greenhouse gas emissions.
To understand the forthcoming greenhouse gas figures proportionally, please be advised that Sightsavers' only UK office is our Head Office. It is the largest of all Sightsavers offices around the world, currently accommodating 158 staff. In comparison, our largest overseas office, India, accommodates 54 staff. Our entire number of staff overseas totals 305.

Scope 1: Direct greenhouse gas emissions

Sightsavers' owned vehicles - In previous reports Sightsavers has non-intentionally misstated that we have no direct greenhouse gas emissions. However, from undertaking an Energy Audit in 2015 (described in more detail under EN18) has educated us in that emissions from Sightsavers' owned vehicles are considered in this manner. As Sightsavers does not own any vehicles in the UK our total greenhouse gas emissions in the UK remain null. At this time we are unable to present accurate figures for direct greenhouse gas emissions by weight in relation to overseas vehicles, due to a lack of data captured on engine size, mileage and cost of diesel per litre. We will aim to provide accurate data in this area in our next full report and in 2016 will be implementing a Vehicle Management System, mentioned in more detail under EN18. However we are able to highlight a 42% decrease in total fuel expenditure since 2013, including a further 28% reduction since 2014, which denotes a significant decrease in direct and indirect greenhouse gas emissions.

Scope 2 - Indirect greenhouse gas emissions

Energy: Electricity - The table below relates to the UK head office location only. All conversions to CO_2 (tonnes) are reported based on information provided by our energy provider or management company at the time.

CO_2 (tonnes) Electricity – UK only	2015		2014		2013	
	KWH	CO2	KWH	CO2	KWH	CO2
Gas	0.0	0.0	16468.2	3.0	24833.0	4.5
Electricity	255570.0	109.9	258252.0	127.6	306656.0	148.3
Total	**255570.0**	**109.9**	**274720.2**	**130.7**	**331489.0**	**152.8**

As previously reported, in April 2014 we relocated our UK head office to more modern, energy efficient premises where we no longer use gas. This has positively resulted in a 16% decrease in total carbon emissions since 2014. Currently, we are unable to collate

data from overseas offices in respect of indirect greenhouse emissions devising from energy usage as many of their local energy providers lack the facility to calculate the emissions resulting from energy generation. We will continue to monitor this position with the aim to report when data is made available.

Energy: Gas and Water – As a result of the UK head office relocation in April 2014, the decision was taken to discontinue using gas as a source of energy, resulting in zero related emissions. Our water usage is concealed in the total usage of the building; therefore as there are 6 floors with a maximum capacity of 13 organisations we are regrettably unable to report on our greenhouse gas emissions for our water supply or water treatment.

Scope 3 - Indirect greenhouse gas emissions
Organisational travel by rail, bus and sea - We are pleased to report a 4% reduction in total expenditure between 2014 and 2015 on global rail, bus and sea travel. As we do not yet capture data on total miles travelled on these methods of transport we are unable to provide approximate emissions by weight, however this is an area that we are aiming to develop in order to better monitor our environmental impact.

Organisational travel by air - The majority of Sightsavers' organisational related air travel (globally by value[1]) is booked via a central process using a travel management company (TMC). We have advanced this approach since our last report and in 2015 all low cost carrier bookings were centralised through the TMC. The TMC provide carbon footprint reports and for Emirates flights, we use an online carbon calculator. A very small portion of air travel is booked by local offices directly in country and, regrettably, there are no processes in place to gather CO_2 data in respect of these locally booked flights. We are exploring options that will enable us to collect this data in future. There has been a significant increase in flights booked and CO_2 emissions in 2015, however this increase in flight numbers was expected. 2014 saw a reduction in air travel to programme countries due to the Ebola outbreak in Liberia, Sierra Leone and Guinea, which resulted in a considerable reduction in travel to/from/within West Africa region. As the situation in 2015 became more stable, travel to this region has resumed at normal levels. The 2014 flight figures were also reduced as the organisation did not hold a Programme Meeting, which brings together a significant number of global staff members. These meetings have moved to biennial frequency and in 2015 this meeting took place.

CO_2 (tonnes) Air Travel Report	2015		2014		2013	
Journey Type	**CO2**	**%**	**CO2**	**%**	**CO2**	**%**
Short haul (Europe) - TMC	25.99	1.96%	12.06	1.23%	16.48	1.14
Short haul (other continents i.e. Africa to Africa) - TMC	59.58	4.49%	56.16	5.75%	42.03	2.91

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[1] *A significant proportion of the business related air travel which is booked via the central process is funded by "Gifts in Kind" made to Sightsavers by Emirates Airlines via their Skywards "air miles" scheme upon which Sightsavers only pays the airport tax element. During the year, Sightsavers utilised 23,562,750 Skywards miles (2014: 19,931,144) for the purpose of 275 related flights (2014: 221). In Sightsavers' annual report and accounts these have a value of £151,659.37 (2014: £157,514.82) based on the lowest economy fare available at the time of travel. It should be noted that tax costs for Emirates have increased significantly.*

Long haul - TMC	915.36	68.92%	668.97	68.47%	606.19	42.03
Total - TMC	*1000.93*		*737.18*		*664.7*	
Long haul – Skywards (donated)	327.14	24.63%	233.51	23.90%	388.73	26.95
Short haul (Europe) i.e. Easyjet	Within TMC	0%	6.37	0.65%	388.73	26.95
Total	**1328.07**		**977.06**		**1442.16**	

Paper consumption and recycling - In 2015 we installed software on all printers in the UK head office which capture usage and enable us to report the environmental impact of our in house printing, scanning and photocopying. The software requires staff to use a programmed pass in order to release any print jobs, ensuring paper is not wasted. In addition, our default print settings are set for duplex, grey scale printing to further reduce the number of sheets and energy used. Against the known average of 10,000 printed sheets per employee per year, Sightsavers is pleased to present an average of 1,580 sheets per head office employee totalling 1.124 tonnes of CO_2.

Environmental Impact	Measure	2015
Total Printed Pages	Pages	396,974
Total Printed Sheets	Sheets	249,676
Trees Consumed	Trees	3.1
Equivalent Bulb Hours	Hours	70741.5
Total CO2 Produced	**Tonnes**	**1.124**

EN18 and EN26 Initiatives to reduce and mitigate environmental impacts of operations and reductions achieved

Energy saving opportunities and environmental management

The government led Energy Savings Opportunity Scheme (ESOS) in 2015 helped us to identify cost-effective energy saving measures through conducting an Energy Audit at our UK head office. Our primary action has been to schedule the replacement of our current lightbulbs with more energy efficient LED bulbs, once lamp failure has occurred. We are also looking at ways to encourage staff engagement with our energy practices to further ensure we are being as energy conscious as possible. As a result of this, Sightsavers is currently devising plans to implement an Environmental Management System which aims to all encompass all of our country offices. We hope to be able to report on our early achievements in our next full report.

Sightsavers' owned vehicles

We are currently creating a Vehicle Management System which will establish key data on individual vehicle mileage and service history. Whilst this heavily relates to our health and safety policy, this will allow us to effectively report on greenhouse gas emissions by weight and also enable us to devise ways of reducing these figures in the future. As reported in 2013, we began a programme in 2011 to replace all office vehicles with safer, fuel efficient and low-emission Ford Ranger vehicles. We also endeavour to ensure vehicles used in Sightsavers' projects (not owned by Sightsavers) are of a similar standard. There are currently 61 vehicles owned by Sightsavers globally. Powered by

diesel, these vehicles attract less vehicle tax than petrol equivalents due to their superior CO_2 performance resulting in approximately 15% less CO_2 than petrol. This programme of vehicle replacement runs until 2017/18 where it is likely to be renewed due to its successes.

Since 2014 we have been implementing a driving course for Sightsavers country office drivers or drivers employed under specific projects. The course principally focuses on road safety and security whilst also highlighting methods for improved fuel efficiency and environmentally minded refuelling (including how to avoid cross-contamination of water sources). At end of 2015 our entire West Africa region had completed the course, with plans for all drivers in other regions to complete by Q3 of 2016. This course will be undertaken by new drivers and refreshed every three years.

Courier services

We have nominated DHL as our preferred logistics and transportation provider to globally transport the majority of our project resources and equipment. Consignments for transportation are consolidated wherever possible and, wherever possible, we look to purchase stock in bulk to minimise both cost and the environmental impact omitted through transportation. Whilst Corporate Social Responsibility is integral to DHLs strategy, their environmentally focused Go Green policy is fundamental. DHL now not only offset CO_2 but other greenhouse gases such as methane and nitrous oxide as well, meaning their Go Green programme has progressed from carbon neutral to climate neutral. As of 2016 Sightsavers hopes to receive an emissions report from those omitted throughout our transportation supply chain so we can monitor our impact.

Programmatic and project work

Sightsavers has not yet developed a systematic approach to assessing the environmental impact of our projects in developing countries; we carry out a vast number and variety of projects and work with a large number of partners all over the world which makes the formalisation of such extremely difficult. In addition, we are also bound by strict funding regulations. Whilst we recognise the benefits in collating and evaluating this prospective data, be assured Sightsavers continues to operate in a social and environmentally minded manner in all our operations and never knowingly to the detriment of our beneficiaries. Examples of how we safeguard our environmental impact include using existing infrastructure in all means possible, advertising an accessible, central location to conduct our outreach work (as opposed to driving to each community) and utilising multi-passenger vehicles for transportation.

Additional organisational initiatives implemented in 2015 to reduce and mitigate our environmental impact are highlighted below:
- **e-Procurement** - Our offices continue to utilise our efficient e-procurement system to reduce paper usage.
- **e-Filing** - Our efficient e-Filing System at the UK head office allows us to send, receive and retrieve all paperwork electronically. Any hard copies received are then recycled.
- **Print publicity materials** - Our printing broker CalliMedia continues to monitor our stock of print publicity materials and recycle out of date publications, resulting in reduced paper wastage.
- Water - The bathroom taps in our head office operate on a sensor basis so that water is not wasted.
- **Recycling** - There are adequate recycling facilities within the new head office premises located at printing and kitchen points and staff are encouraged to

deposit all recyclable material when no longer required. The number of general waste bins was reduced to encourage staff to recycle where possible, there are no personal waste bins.

- **Timer settings** - Our heating, lighting and office appliances utilise timer settings to reduce our energy usage. As few as possible electrical and electronic devices are left on or on standby.
- **Virtual meetings** - Wherever possible global staff use email, telephone and virtual meeting facilities such as video conferencing, in replacement of, or to plan activities prior to, undertaking air travel. Adequate training is provided to ensure staff utilise these facilities.
- **Maintenance of HVAC and appliances** - We undertake regular maintenance checks and tests of all of our HVAC and office appliances to ensure they remain in optimum condition and do not create waste unnecessarily.
- **Bicycle lockers** - At our head office we provide ample facilities for staff to safely store their bicycles in a way to encourage carbon neutral travel to work
- Suppliers and contractors - We try to ensure wherever possible that contractors and suppliers comply to BS/EN environmental standards
- **IT infrastructure** - We have ensured that machines in overseas offices are remotely accessible to minimise travel from the UK I.T team. If a problem is not solvable remotely, we make use of local third party IT technicians to minimise travel impact.

IV.   Human Resource Management

LA1 Total workforce, including volunteers, by type, contract, and region
The size and composition of the total workforce at Sightsavers for the 2015 reporting period is detailed in the table below

	Sightsavers	Europe	UAE	WARO	ECSA	India	SE Asia
Full time		160	2	100	82	54	41
Part time		23	0	0	0	0	1
Total	**463**	**183**	**2**	**100**	**82**	**54**	**42**
Permanent		156	2	38	0	0	16
Fixed term		27	0	62	82	54	26
Total	**463**	**183**	**2**	**100**	**82**	**54**	**42**

Sightsavers has approximately 40 'active volunteers' who take part in speaking engagements ranging from talks to community groups to events/conference cover.

Four of the volunteers are Volunteer Coordinators. Volunteer Coordinators will spend an average of 3 – 5 hours per month involved in Sightsavers activity and other volunteers will volunteer up to three hours per month. Volunteers received thorough training in 2011 and are offered refresher sessions when required.

EC7 Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation
Sightsavers' Global Diversity and Equality Policy was updated in January 2016 and continues its commitment to employing a workforce that reflects the diversity of local contexts and cultures.

Sightsavers' recruitment practices promote our commitment to hiring local staff at all levels by advertising all roles via online advertising and local print media. All roles are also advertised internally so that all employees receive notifications of new vacancies and can be considered as an internal candidate. Employees are offered contracts in line with national terms and conditions.

As evidenced below the vast majority of senior managers are hired locally and Sightsavers has a successful record in development of employees and internal promotions. Senior Managers include the Management team, Strategy team, Regional and Country Directors.

Region	Senior Managers 2016	Hired locally 2016	Proportion 2016	Proportion 2013
East, Central and Southern Africa	9	9	100%	100%
India	8	8	100%	100%
West Africa	9	7	78%	90%
South Asia	3	3	100%	100%
Europe	8	8	100%	100%

LA10 Workforce training to support organisational development

Sightsavers is committed to the learning and development of all employees across our Directorates. Investment in staff development is monitored via the SIM card which identifies the expenditure spent on staff development as a percentage of total salary cost. In 2015, the average spend was 2.52% of total salary cost which was over the organisation target of 2% spend. From Q4 of 2015, the target has risen to 3% which the team will work towards over the course of the year.

The learning and development of employees is managed across the organisation by senior managers and line managers, administrative support is provided by the HR Operations team. Internal coaching has also been available to employees and managers by two HR Business Partners. Employees also have the opportunity to discuss their development needs in the performance development process and with their line managers in regular one-to-ones.

Sightsavers, HR Business Partners and HR Operations team are working towards delivering a preferred supplier list for training providers to be made available to employees and to achieve economies of scale for the organisation.

The E-learning platform has been used to produce a thorough and accessible Global Induction which will be launched in 2016. All employees will be invited to conduct the module which takes approximately two hours in total. Following the launch, all new employees will be asked to complete the module as part of their induction process. This will provide a consistent message to all employees upon arrival in the organisation and will be continually updated to remain up to date with Sightsavers data and communications. In 2016, Phase 2 of the e-learning platform will be utilised to further develop a range of more in-depth modules commencing with security and cyber security.

LA12 performance reviews and career development plans

Sightsavers PDR's were completed for 2015 and submitted in January 2016. These were fulfilled and learning and development opportunities were sought for employees with

managers from these submissions. The table below shows the percentage of people receiving a PDR in 2015 organised by Directorate

Directorate	Total Employees as at 31.12.2014 including leavers	PDR Returned	% returned
Directors	5	2	40.00%
Finance and Performance	280	185	66.07%
Global Fundraising	37	11	29.73%
HR & Organisational Development	9	3	33.33%
NTD's	19	9	47.37%
Policy and Programme Strategies	36	20	55.56%
Strategic Communications Team	12	0	0.00%
Total	**398**	**228**	**57.29%**

The employee survey results of December 2015 identified feedback from employees that the current performance development process needs to be reviewed and improved. This feedback has been taken on board and HR Business Partners are working to improve the process and take into account the feedback received from employees. The performance development process will be improved and implemented in 2016 and we will continue to report on it.

With the new HR team in place, the HR Business Partners work closely to support management in identifying and supporting individual and team development. They advise on bespoke options and plan in the future to deliver sessions via the Knowledge Cafe's and have objectives including creating manager toolkits. In addition to annual performance and development reviews, managers are encouraged to meet employees regularly to discuss performance, review job descriptions and progress against objectives through one-to-one meetings

LA13 diversity in your organisation displayed in the composition of governance bodies and employees

In 2015 Sightsavers launched the Empowerment and Inclusion Strategic Framework which includes an objective focusing on scaling up efforts to achieve diversity in the workplace. Activities undertaken in 2015 to work towards achievement of this objective include running gender workshops for all employees and more targeted recruitment advertising. A working group will be set up (which will be operational in 2016) consisting representatives from across the entire organisation who's remit will be to spearhead internal inclusion efforts.

The HR Information system is now utilised for all HR transactions by the HR Operations team. Wider roll out has begun to train and coach managers and employees and training will be completed in 2016. This will aid transparency across the organisation with employees able to have access to and update their own information. It will further evidence and provide data to support and promote diversity in the organisation. We will report on further work in this area in 2016.

The composition of Sightsavers Management and Strategic Team and Trustees is detailed in the table below.

	Management & Strategic Teams		Trustees	
	2016	2013	2016	2013
Total	**16**	**6**	**15**	**16**
Gender:	16			
Male	11	4	11	12
Female	5	2	4	4
Ethnicity:				
White	12	6	11	12
Black	3	0	2	2
Asian	1	0	2	2
Age:				
Under 30	0	0	0	0
30 - 50 years	9	5	3	4
Over 50	7	1	12	12
Disability	0	0	2	2

	Sightsavers		Europe	West Africa	ECSA*	India	South Asia
	2016	2013					
Total	**463**	**398**					
Gender:							
Male	261	209	119	70	56	39	31
Female	202	187	64	30	26	15	11
Ethnicity:							
White							
White British	127		125		2		
White Other	11		11				
White Irish	11		12				
White Black Caribbean							
Black	3						1
Black African	136		12	72	52		
Black Caribbean							
Asian							
Asian						30	
Asian Other	10		3				7
India	30						
Pakistan	9		2				7
Bangladesh	8						8
Sri Lanka							
Undisclosed	118		23	27	25	25	19
Age:							
Under 30	46						
30 - 50 years	341						
Over 50	76						
Disability	16**		6	2	4	3	1

East, Central and Southern Africa

** *This number represents only staff that have wished to voluntarily disclose having a disability as there is no requirement to do so.*

NGO9 Mechanisms for workforce to raise grievances to management and their resolution

During 2015 Sightsavers transitioned from having a designated HR department to adopting an embedded HR structure, aligned with operational needs of the business. This included recruiting two new HR Business Partners whose primary function is to provide HR representation for specific departments, including supporting managers to resolve grievances should they arise. The HR Business Partners also offer dedicated expertise in each of their areas, for example in policy development and international workforce management, and they work closely with directors, managers and employees in each area. An additional result from the change in HR operating model is the change in reporting lines of the HR Operations team, which now sits under the Finance and Performance department. The operations team continues to work to support employees and managers in a variety of requests. Recruitment into the new HR structure was finalised in Q4 2015 going forward the embedded function will continue to work closely to support the HR needs of the organisation and to improve the employee experience. Key initiatives that have been introduced under this new structure are outlined below.

- **Updated policies and procedure** – HR Business Partners and the People team have worked closely to bring policies up to date and in line with current best practice. These updated policies and procedures have been made available to employees via the intranet. These include the Grievance and Whistleblowing procedure that employees can access and make use of. The policies form part of the core induction process for all employees.
- **Knowledge cafes –** Managers and employees receive coaching and training in informal settings at regular intervals and have been given the opportunity to feed in requests for knowledge cafes. This has also meant that employees from different Directorates are coming together for learning seminars and working closely together. Virtual knowledge cafes were also held for employees in differing country offices.
- **HR Newsletter –** Employees receive a regular HR newsletter which updates on the initiatives underway and their progress.
- **2015 Employee Surveys –** The 2015 Employee Survey was completed and results were shared with all employees. The employee survey provides an opportunity for staff members to provide feedback to the organisation in a broad range of areas. The response rate was high at 98%, a 4% increase on 2013 survey. Over 94% of employees reported that they are proud to work at Sightsavers.
- **Manager toolkits –** Will be launched in 2016 with written materials, instructions and advice for managers. Newly promoted managers and newly employed managers also receive one-to-one sessions with HR Business Partners in their first weeks with the organisation.
- **HR Business Partners and HR Operations team –** Each area is supported by a HR Business Partner. Employees also work closely with and have access to the HR Business Partners and the HR Operations team. There are a number of communication mediums employees can use to engage with HR and seek support.

V. Responsible Management of Impacts on Society

SO1 Impact of activities on the wider community

The Project Design Process, detailed under indicator NGO1, sets out our approach to project design, including how decisions are made on entering new countries, projects and partnerships. The Reflection, Oversight, Analysis and Review group is responsible for strategic review and decision making on direction of our global programme portfolio. Decisions to implement new projects is taken by this group, who's function is to assess gaps in portfolio and delivery of our thematic strategies based on evidence and financial review Decisions to enter new countries will be escalated to the Strategy leadership group (described under indicator 2.3) and will be approved by Council.

Child Safeguarding policy

At the end of 2015 Sightsavers initiated a process to revise the Child Safeguarding policy to ensure that it remains aligned with international standards and best practice and relevant for Sightsavers mandate and programmes. In addition to the revision of the policy, work will also be carried out in 2016 to identify contextually appropriate approaches and practices which key stakeholders in our programmes (including teachers, caregivers, health professionals and social workers) can adopt to ensure safeguarding of children participating in Sightsavers' work. This will also include development of a short training module to raise awareness of child safeguarding approaches and practices, to be delivered by in-country trainers. We will provide details on progress in our 2016 report.

Withdrawal from Sri Lanka

Sightsavers mid-term strategy review identified that the process of integration of eye health and social inclusion components in the national plans of Sri Lanka was on course with the ability to sustain these interventions. A working group, consisting of key global and in country staff, was convened to manage the country withdrawal process and a detailed terms of reference was developed, incorporating objectives and clarifying specific roles for individuals responsible for implementing the withdrawal. It was decided that a two year timeframe, January 2014 to December 2015 was required to ensure the withdrawal programme was managed in an appropriate, informed and supportive manner to maintain and ensure sustainability and the significant progress made in the eye health and social inclusion sectors in Sri Lanka. A disengagement strategy aimed at ending the channelling of Sightsavers' resources from agreed areas of work/programmes took place, while independently supporting partners to reach a state of organisational development and capability. This helped to work towards the objective of adoption and replication by partners which is a central element in the strategy of Sightsavers. The withdrawal programme included a review of local laws covering employment, audit, tax-payments and de-registration from the NGO Secretariat, while consultations were held with the Commissioner of Labour. A formal report summarising the key learning points and good practice emerging from the Sri Lanka withdrawal has been developed to inform future project design and any subsequent country exits and is attached as an annex to this report. A consolidation of useful external resources identified from the wider sector on managing project and country exit has been completed. Finally, the Sri Lanka withdrawal process was audited as part of Sightsavers internal audit programme with the Head of Internal Audit able to provide a high level of assurance in relation to this process. Key findings include a high degree of confidence amongst our partners that the Primary Eye Care and Low Vision Programmes will continue and that the withdrawal closure model we have developed is robust and one that we can develop and re-use in other territories as and when the need arises.

Project exit

As described in the 2013 report, Sightsavers began a process of strategic alignment to bring its global portfolio of programmes in alignment with the organisational and thematic strategies. The strategic alignment process extended into 2014 and results of this process led to a number of projects identified for exit. Exit guidance was developed to support country offices and partners to ensure consistency of approach in implementing and managing the project exits. Whilst exit work is overseen from the centre, country offices are ultimately responsible for leading the exit process, including communication with partner organisations, identification and mitigation of potential risks, documentation of close-out considerations such as asset management, financial arrangements, and final reporting.

At the end of 2014 learning and informal feedback was gathered from key stakeholders involved in implementing the exit process, which led to finalisation of the tools and guidance and formal adoption of the process as part of Sightsavers programme cycle management process. The exit process and guidance is available to all staff via our intranet. In addition, planning for exit and sustainability is a core requirement of the Project Design Process (PDP) launched in 2015.

SO3 Process for ensuring effective anti-corruption policies and procedures

The most recent formal fraud and abuse risk assessment was conducted in 2014, and was reported to Audit Committee. At its April 2016 meeting, the Audit Committee requested that a further assessment analysis is completed and, going forward, for these to be completed annually. The next report will be submitted to the Audit Committee in September.

Sightsavers' External Auditors as part of their annual report, and based on information provided by Internal Audit and other testing, include a formal fraud risk assessment, which is considered by the Audit Committee each year in April. As part of Sightsavers' response to and in support of Financial Action Task Force (FATF) recommendation 8 this will include a specific assessment of the risk exposure to anti-terrorism funding and money laundering across the territories in which we operate.

Sightsavers has an embedded Fraud and Anti-corruption policy that is updated annually and approved by the Audit Committee. It was last reviewed and updated in September 2015 (policy attached as an annex). Staff are reminded of its existence and it is available on our intranet. Business partners are informed about the policy as part of our contracting arrangements and methodology. As part of their induction, all new members of staff are informed of our policies and associated procedures with respect to fraud and zero tolerance is effectively communicated. An electronic training package has been developed for use by all staff. Completion of this package will be continuous on a rolling programme basis and key staff (for example those working in financial roles) will be required to work through the package every 12 to eighteen months, with all other staff updating their training every 24 to 36 months.

In 2015, Sightsavers developed a separate policy and process on Anti-Terrorism funding which is currently being promulgated. The associated system, supported by an IT package, includes more detailed checking of key staff, partners and suppliers to ensure that we mitigate our risk exposure.

The Financial Framework is fully embedded across the organisation, as previously reported, and forms the principle mechanism for control and the prevention and detection

of fraud. A range of structured controls and measures operate to deter and stop abuse. Internal audit, external audit and Regional Finance Managers play a specific role in monitoring the performance of these systems, and specifically the controls to prevent abuse. The Financial Framework is currently being fully updated, in line with existing policy, and this will include a review of the fraud and abuse control framework to ensure that the latest developments in thinking and practice are properly incorporated and included. As part of the above Sightsavers is making increased use of PROACTIS as the main procurement management tool. The embedded stratified control features and reporting mechanisms are contributing to our fraud management framework.

During 2015 our Partnership Management Arrangements were reviewed and introduced across the business. The updated process has strengthened the management control framework – to drive greater management accountability and more robust assessment from the due diligence perspective on the probity, integrity, suitability and effectiveness of the partners with whom we do business.

In 2015 we strengthened and enhanced our controls to prevent and detect e-commerce fraud and abuse, which included extended embedded controls in our business systems as well additional manual technical and test checking and reporting. Moving forward, as we continue to develop our cyber risk management strategy and response, fraud and abuse prevention and detection will form a key component especially around protecting funds: protecting our valuable data; our mechanisms for transferring funds internationally and our donors.

Both the level of referrals and enquiries have been increasing over the period, both of which are strong indicators that the policy and process is embedded across the business. Enquiries can take the form of asking whether a particular event or occurrence should be reported as abuse; or, actually anticipating an issue (deterrence) asking whether some proposed activity is appropriate and in accord with policy and procedure – recently there was an enquiry regarding the propriety/legality of our ability to acquire vehicles on behalf of another entity. All of this indicates increased levels of awareness. What has been particularly encouraging have been the increased number of referrals from partners on alleged fraud and abuse, which demonstrates that they are aware of the policy and contractual obligation; and, that their internal systems are operating. The investigation mechanism and inter-partner liaison on this is working effectively.

SO4 Actions taken in response of incidents of corruption
All incidents in relation to fraud are formally reported to the Head of Internal Audit (HIA) and the Director of Finance and Performance. The data is captured on registers maintained by the HIA, who is designated as the primary investigator into all allegations. These are used to inform Internal Audit and Regional Finance Manager annual review programmes.

Sightsavers' Audit Committee has a fixed agenda item on Fraud and Abuse. The HIA reports all incidents to the Audit Committee, including the outcomes of any investigations. The role of the Audit Committee is to satisfy itself that incidents and allegations have been appropriately investigated and addressed; it decides whether any particular incident needs to be escalated to full Council because of its seriousness and reputational risk implications; and, whether to recommend that an issue or allegations needs to be reported to external regulators. Specific incidents would be highlighted internally to the management team, especially a control weakness that is potentially systemic across the business. The HIA discloses instances fraud to the INGO Heads of Internal Audit meeting

(along with other HIA's) to highlight potential weaknesses that might be impacting other INGO's so learning can be communicated across the wider INGO family. A similar approach is adopted at the Charities Internal Audit Network (CIAN) meeting.

Since 2013 some 15 allegations of fraud and abuse have been received and investigated, which involved a financial loss exposure of just under £40,000. They were discovered by internal audit reviews; management checks and anonymous allegations/whistleblowing. These comprised a wide range of abuse which include false invoicing; soliciting improper payments from beneficiaries; submitting "inflated" data on surgeries (claiming for work not done); laptop and other valuable equipment theft; and, conflict of interest involving undisclosed employment of relatives etc. None were reported to the police (apart from the laptop thefts). A variety of penalties were imposed: monies paid were recovered or re-imbursed and staff were either formally disciplined or ceased to be employed.

VI.   Ethical Fundraising

PR6 Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising, including advertising, promotion, and sponsorship
As described in the 2013 report, Sightsavers and its entities operate in compliance with a number of internal guidelines and a broad range of legal national standards and voluntary codes. The requirements of these standards and codes, along with our internal procedures, govern how we manage fundraising activities and report against complaints that are received.

In response to a gap highlighted by feedback from the Independent Review Panel on our 2013 report, Sightsavers, in 2015, developed a Global Fundraising and Donations Acceptance policy (approved by Council in March 2016). The policy development process was led by the Director of Individual Giving and Director of Major Giving, in consultation with key stakeholders from across the organisation. The policy covers our global fundraising operations in India, the Middle-East and Europe. The key principles of the policy are to provide guidance and clarity for staff, trustees and other volunteers, ensure compliance with the law and Charity Commission guidance and to protect Sightsavers' reputation. For internal procedure, the policy describes who has authority to take decisions in regard to donation acceptance and its existence ensures that decisions taken are consistent and based on the needs of the organisation. The policy has been rolled out globally, to all fundraising and country offices and will form part of the core induction for new employees. For transparency and accountability to our supporters and beneficiaries, the governance page on our website includes a focused section on our 'fundraising promise'. This webpage sets out the key principles of the policy, provides detail on our membership to the FRSB, Direct Marketing Association and the Institute of Fundraising, and provides contact details for directing queries relating to fundraising activities. http://www.sightsavers.org/about-us/governance/our-fundraising-promise/.

Information on major institutional gifts and gifts in-kind are fully disclosed in our annual report and accounts. This is audited financial information which is published on our website http://www.sightsavers.org/about-us/governance/annual-accounts/

As described under indicator NGO2, Sightsavers' has a complaints policy which is publically available via our website http://www.sightsavers.org/about-us/us-contact-us/. Sightsavers' Customer Care team is responsible for handling all direct complaints and responses differ depending on the fundraising activity. In 2015 all complaints were resolved satisfactorily by the Customer Care team without escalation to senior

management teams being required. In addition, complaints raised to Sightsavers via the FRSB complaints process (http://www.frsb.org.uk/complaints/the-complaints-process/) in 2015 were all resolved within tier 1 of the complaints procedure.

In 2015, the number of complaints recorded in relation to fundraising activities are detailed below, broken down by type of activity. Complaints are reported annually to Fundraising Standards Board (FRSB) and are published on their website at the following link (http://www.frsb.org.uk/organisation/sightsavers/).

Type of fundraising	Volume	Complaints
Telephone fundraising	29,625	8
Addressed pieces of direct mail	1,523,429	136
Email fundraising	1,238,456	9
Television adverts	26,194,000	0
SMS fundraising	5034	0
Press advertising	3,110,585	0
Magazine / Newspaper inserts	4,362,705	0
Prospect face to face fundraising	850,347	33
Outdoor events	9	0
Raffles	173,761	0
Fundraising from business	240	0
Trusts and foundations	1250	0
Major donor fundraising	1470	0
Online fundraising	24,822,240	3
Volunteer fundraising 'on behalf of' events	1	0

Annexes

1. Project Design Process narrative, Sightsavers internal, 2015

2. M&E framework, Sightsavers internal, 2015

3. 2015 Evaluation summary, Sightsavers, 2016

4. Policy development guide, Sightsavers internal, 2014

5. Partnering for success - key learnings from the Sri Lanka withdrawal programme, Sightsavers, 2016