

Feedback from the Independent Review Panel

Review Round November 2015

15 December 2015

Dear Dave McComiskey,

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

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

Getting fit for the digital age

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

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

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

Globalisation / National level accountability

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

Inclusion and diversity

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

to a human rights based approach, but may also improve results by tapping into a wider base of experience. For further advice, click [here](#) on the outcome of a Charter webinar on inclusion or [here](#) to look at some good practice examples of Charter Members.

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

Organisation-specific feedback to CBM

CBM's sixth accountability report to the Charter is a concise interim report based on last year's Improvement Analysis along with the Independent Review Panel's feedback letter.

Overall, CBM has taken the Panel's recommendations on board, provided a very good analysis of and demonstrated progress in the identified areas for improvement. This includes the establishment of a feedback mechanism for the International Advocacy and Alliances (IAA) department (NGO5) and the redesigning of performance appraisal forms to make them more user-friendly (LA12). Other issues such as targets for diversity improvement (LA13) remain areas where the Panel is hoping to see progress in the coming years. It is also hoped that CBM will be able to general evidence demonstrating practice throughout the next full report.

As in previous years, the report's opening statement provides a strong but generic commitment to demonstrating accountability towards CBM's target group, partners, donors, the public, and peer organisations. The Panel would welcome some further information on which *specific* role accountability plays in achieving CBM's operational and strategic aims. CBM is encouraged to use this feedback letter as well as the one for the last full report in the preparation for their 2015 full report.

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

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

Yours sincerely,



Louise James



Michael Röskau



Jane Kiragu



Rhonda Chapman



John Clark



Saroeun Soeung

Review Round October 2015
Cover Note on Accountability Report

CBM – Christian Blind Mission

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

EVIDENCE

CBM followed up on the Panel’s recommendation to provide more evidence that procedures and policies described in the 2013 report actually work in practice. Examples of such evidence include recommendations to Member Associations, following a donor complaint on a partner, or particular learnings and effects through capacity development support in Cameroon (pages 3/4). The Panel looks forward to similar evidence in other areas of next year’s full report.

While the processes for making complaints, alleging fraud and airing disputes are clear, the 2013 report did not give any information on what complaints and feedback was received and how this was resolved. CBM is encouraged to provide this level of detail in their 2015 report.

PROFILE DISCLOSURES

Strategy and Analysis

1.1	<p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>The interim report’s opening statement from CBM’s President Dave McComiskey provides a strong commitment to demonstrating accountability towards CBM’s target group, partners, donors, the public and peer organisations. However, as already mentioned last year, the statement would profit from a short explanation of what accountability means in practice to CBM and which <i>specific</i> role it plays in achieving operational and strategic aims.</p> <p>The Panel looks forward to hearing more in the full report on mentioned topics such as the developed Policy for the Prevention of Corruption and Fraud, the newly implemented Anti-Corruption Training Software, the implementation of the Red Flag System and CBM’s roll-out of the Dispute Resolution Process (DRP) in 2015.</p>
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PERFORMANCE INDICATORS

Programme Effectiveness

NGO4	<p>Gender and diversity <i>Addressed</i></p> <p>It is stated that “due to CBM currently undergoing major structural and programmatic shifts, it is thought to be more sensible for the Gender Policy development process to commence once major shifts are concluded”. In the meantime, a Position Paper refining CBM’s programmatic approach to Gender and Disability is being drafted and the Panel appreciates that this will be included</p>
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	<p>in next year's full report. It is positively noted that some of CBM's sub-offices and partners have drafted Gender Policies for their regions.</p> <p>Moreover, the Panel would like to commend CBM for having made considerable investments in 2014 in improving their internal qualitative Monitoring, Evaluation, and Learning Instruments in becoming gender and disability sensitive. The organisation is very open that the lack of previous detailed quantitative data as well as the lack of detailed global data on Gender and Disability prevent the application of detailed numeric indicators so far. Yet, with current monitoring systems becoming more gender and disability sensitive, CBM is positive to be able to build further data out of which measurable indicators can be developed in the coming years. The Panel looks forward to advancements in this regard.</p> <p>Finally, it is assumed that the word "detrimental" in regard to the promotion of gender equality is a spelling mistake (page 5).</p>
NGO5	<p><i>Advocacy positions and public awareness campaigns</i> <i>Fully addressed</i></p> <p>The Panel welcomes the establishment of a <i>permanent</i> feedback mechanism from the International Advocacy and Alliances (IAA) department – how does this work in practice? CBM actively seeks alliances; the Panel would appreciate more details on developments and usage in practice in the full report. This mechanism provides the IAA with the ability to make adjustments or stopping certain activities. However, the majority of advocacy programmes and campaigns are conducted under by CBM's Member Associations, who bear the responsibility for corrective actions. How does CBM International work with Member Associations to ensure that there is oversight, that amendments are taken when required and that there are uniformly high standards of governing advocacy across CBM? Is there a globally agreed strategy for any given topic?</p>
Human Resource Management	
LA12	<p><i>Global talent management</i> <i>Partially addressed</i></p> <p>The Panel appreciates that CBM redesigned their performance appraisal forms and made them more accessible. It is hoped that this will lead to a higher implementation rate. The Panel looks forward to results from this pilot after the envisaged 2015 appraisal cycle.</p> <p>Progress on streamlining the performance appraisal process and basing it firmly on the Competency Model is positively noted. CBM is encouraged to provide more details on the introduction of the Individual Development Dialogue as a tool in 2015 – how does this differ from performance appraisals and how are they linked? Most importantly how does CBM track if performance appraisals improve the coherence and effectiveness of staff in achieving strategic goals?</p>
LA13	<p><i>Diversity of workforce and governance bodies</i> <i>Addressed</i></p> <p>CBM does not have an explicit overall policy or guideline on diversity or inclusive HR in place although it is embedded in most HR core processes such as recruitment. A new internship programme was put in place that requires 50 percent of interns to have a disability. What is the rationale or narrative behind such numbers? While it is understood that targets for diversity will only be set</p>

	<p>after the new CBM Family Strategy is finalised by 2016, the Panel encourages CBM to start initiatives to address this in the interim and to provide information demonstrating how the inclusion of diversity in core HR processes leads to diversity in the workforce and on governance bodies.</p>
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