

Feedback from the Independent Review Panel

Review Round June 2016

27 June 2016

Dear Caroline Harper,

Many thanks for submitting your INGO Accountability Charter report. In times of conflict and climate change, when civil society organisations (CSOs) have an increasingly important role to play, the space for civil society is shrinking in many parts of the world. Strong accountability and the demonstration that we “walk our talk” have never been more important. It is also against this background that the Charter has initiated an alliance with eight 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 Sightsavers

Sightsavers' fifth accountability report on 2015 was submitted very timely (only five months after the end of their financial year) and thereby shows a great example of on-time accountability practice. It is overall again a very good, crisp and comprehensive report.

Strong **institutional commitment** to accountability – focusing on good stakeholder engagement processes as well as having good data and evidence to demonstrate whether CSOs are delivering on promises – is highlighted in the CEO's opening statement. It is appreciated that Sightsavers proudly presents Charter membership on their governance website – including the Charter logo and the most recent report (see [here](#)).

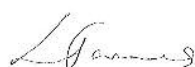
As recommended in previous Panel feedbacks, more **evidence** is provided that policies and procedures work well in practice and Sightsavers shares interesting examples to underline their impact (even exceeding self-set targets). Some policies and documentation which are not published online were moreover shared with the Panel. In addition, comprehensive and clear interlinkages between the different indicators are appreciated by the Panel. The following answers are seen as **Good Practice** for other CSOs: Sightsavers' very thorough MEL system closely aligned with its strategic objectives and including the commendable SIM card (NGO3), publication of all policy positions on their website (NGO5), and the visualised partnership framework including individual toolkits for the three phases (NGO6).

On the other hand, smaller weaknesses remain and are summarised in the **Improvement Analysis** which is shared jointly with this letter: Workforce training (LA10), the current performance development process (LA12), and workforce grievances (NGO9). This forms the basis for the interim report on 2016 before another full report will be required on 2017. Please let the Panel know how you prioritise these identified areas.

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 29 July 2016.

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

Yours sincerely,



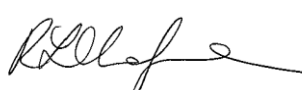
Louise James



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Sightsavers

Review Round June 2016 Cover Note on Accountability Report 2015

PROFILE DISCLOSURES	
I. Strategy and Analysis	
1.1	<p>Statement from the most senior decision-maker <i>Fully addressed</i></p> <p>Caroline Harper, the CEO of Sightsavers, provides again a very strong and far-sighted institutional commitment to accountability. According to her, having good stakeholder engagement processes as well as having good data and evidence to demonstrate whether CSOs are delivering on promises is the “bedrock of accountability”. Accountability is featuring more and more in UK press and the crucial trust in CSOs is under threat. Accountability is thus needed to show positive impact to the public.</p> <p>The Panel further appreciates Sightsavers’ high relevance of accountability towards their partners, donors and beneficiaries. Progress made on a refreshed SIM card and unified website as well as the positive employee survey (97% response rate with over 90% “proud to work at Sightsavers”) are positively noted. Sightsavers openly states that they need to improve in the employment of people with disabilities.</p> <p>Finally, it is positively noted that previous Panel feedback has stimulated the launch of a new fundraising policy. Future improvements in the areas of data protection and external communications will be very welcome.</p>
II. Organisational Profile	
2.1 – 2.7	<p>Name of organisation / Primary activities / Operational structure including national offices / Headquarter location / Number of countries / Nature of ownership / Target audiences <i>Fully addressed</i></p>
2.8	<p>Scale of organisation <i>Fully addressed</i></p> <p>Sightsavers provides a comprehensive overview of the organisation’s scale, including relevant financial and staff figures. As in previous years, the majority (68%) of incoming resources comes from a gifts-in-kind donation of Mectizan ® form Merck and Co. Inc.</p>
2.9	<p>Significant changes <i>Fully addressed</i></p> <p>Sightsavers lists numerous changes in 2015 (e.g. restructuring of the Communications department, implementing an embedded HR structure, launching the Empowerment and Inclusion framework, moving to quarterly reporting, renewing the SIM card, strengthening their cyber security) which will be partly discussed in more detail throughout the report.</p>

2.10	<p>Awards received <i>Fully addressed</i> Sightsavers can be commended for having won two awards in relation to their fundraising work.</p>
III. Report Parameters	
3.1 – 3.4	<p>Reporting period / Date of most recent report / Reporting Cycle / Contact person <i>Fully addressed</i></p>
3.5	<p>Reporting process <i>Addressed</i> Sightsavers demonstrates that different organisational functions feed into the accountability report and that the report is internally circulated together with the Panel feedback. The Transparency Working Group, set up in 2014 to strengthen cross-organisational understanding of transparency and accountability, is a commendable approach. However, has there been any feedback from staff or this working group and how has this actually shaped the report? Please ensure a proper two-way communication / process.</p> <p>The 2013 report was disseminated globally throughout the organisation and areas of focus in the Improvement Analysis were discussed in depth with the responsible teams. The 2014 report is uploaded to Sightsavers' website. With reference to improving the external benefits of this reporting, the example of Educo's executive summary of their 2014 report offers a more user-friendly report, which may be of interest.</p>
3.6 – 3.7	<p>Report boundary / Specific limitations <i>Fully addressed</i> Sightsavers is part of a partnership called WillAid, which is a group of UK charities to undertake fundraising around the creation of legal wills by solicitors. This partnership is not included in the report. Moreover, there are still no systems to allow reporting on carbon emissions relating to energy usage by offices outside of the UK (EN16).</p>
3.8, 3.10 – 3.11	<p>Basis for reporting / Reporting parameters <i>Fully addressed</i></p>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	<p>Governance structure <i>Fully addressed</i> Sightsavers provides comprehensive information about their governance structure including Board committees, different authority levels and risk management. They describe this structure as “highly flexible and responsive to changing conditions, whilst conforming all operations to an over-arching vision and mission”; thus optimally supporting their strategic priorities.</p>
4.2 – 4.3	<p>Division of power between the governance body and management / Independence of Board Directors <i>Fully addressed</i></p>
4.4	<p>Feedback from internal stakeholders</p>

	<p><i>Fully addressed</i></p> <p>While there are no formal mechanisms for employees to provide direct feedback or direction to Trustees, they can do so via the senior leadership team. Moreover, the employee survey 2015 shows positive responses to questions relating to confidence in the organisation's leadership which are even higher than in 2013. Was there any kind of negative feedback received as well? An additional question in the employee survey 2017 could be: Did staff feel they have a chance to meaningfully impact on decision-making where this is relevant?</p>
4.5	<p>Compensation for members of highest governance body</p> <p><i>Addressed</i></p> <p>Sightsavers outlines the processes for deciding on organisational salaries. It is unclear, however, if Trustees are remunerated. More information can also be found in Sightsavers' Annual Report and Financial Statements 2014: "As at December 2014 the Chief Executive's salary was £114,128. There is no bonus scheme or car allowance, and she has the same pension rights as all other UK staff. All UK staff are paid at least the living wage, including interns. The ratio of the highest paid person to the lowest in the UK is approximately 6:1, and the ratio of highest to median is 3:1" (page 45).</p>
4.6	<p>Conflicts of interests</p> <p><i>Fully addressed</i></p>
4.10	<p>Process to support highest governance body's own performance</p> <p><i>Fully addressed</i></p> <p>Relevant information is provided on the Trustees' appointment, term limits and responsibilities. Individual Trustees are evaluated by the Chair and Vice Chair every two years; the Council usually evaluates itself every other year. Sightsavers is encouraged to provide evidence that these performance evaluations have been used to further improve the effectiveness of the body.</p>
4.12	<p>Social charters, principles or other initiatives to which the organisation subscribes</p> <p><i>Fully addressed</i></p>
4.14	<p>List of stakeholders</p> <p><i>Fully addressed</i></p>
4.15	<p>Basis for identification of stakeholders</p> <p><i>Fully addressed</i></p> <p>Sightsavers has a robust system of policies and guidelines which outline minimum criteria applied in the selection of partners and when not to enter into partnerships (Programme Partnership Policy, Partnership Framework, project design process, Research Strategy, Global Fundraising and Donations Acceptance Policy or Corporate Engagement Policy). Direct links to the policies or guidelines or concrete examples would be interesting in the next report.</p>

PERFORMANCE INDICATORS	
I. Programme Effectiveness	
NGO1	<p><i>Involvement of affected stakeholder groups</i> <i>Fully addressed</i></p> <p>Sightsavers provides detailed information on donors, country offices, affected stakeholders, governments, partners and local actors being engaged in the design (beginning at context analysis and concept stage) and implementation of programmes and advocacy work as well as the development of Sightsavers policies. The organisation is commended for tracking the engagement of its stakeholders through its new SIM Card. What has been the achievement against the global indicator for measuring progress on stakeholder engagement in 2015?</p> <p>The positive results from the Project Cycle Management and Thematic Quality Standards Assessments Tools are well noted. The Panel moreover commends Sightsavers for the Neglected Tropical Disease work which is indeed a good example of community leadership in public health programmes.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i> <i>Fully addressed</i></p> <p>The Complaints Policy is now fully operational. A direct link has been established between this policy and Sightsavers' internal control and assurance mechanisms. Internal and external complaints now influence the organisation's approach to assurance and testing as well as internal audits ensure that operational changes in response to complaints are adequate in order to mitigate future.</p> <p>While it is stated that no complaint has been reported at country offices level, it is not clear if the headquarter in UK has received any complaints in 2015. The Panel is even more interested to learn about kinds / areas of complaints received, how complaints are dealt with and how this will improve stakeholder feedback to be used by decision-makers. What are positive response rates in this regard?</p> <p>Finally, information relating to internal complaints should be reported under NGO9.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i> <i>Fully addressed</i></p> <p>Sightsavers describes a very thorough MEL system closely aligned with its strategic objectives. All programmes are monitored using the Strategy Implementation Monitoring (SIM) card and the Programme Portal system; the latter was launched in early 2015. The organisation has changed its reporting frequency to quarterly basis which has led to improved targeted controls and quality of data. The systems are described as user-friendly for all staff globally.</p> <p>As for the publication of results, it is very much appreciated that Sightsavers will again publish all evaluations and executive summaries on their website in 2016. Moreover, the annual summary of all evaluations conducted (submitted as an annex to the Panel) is a commendable approach. Finally, Sightsavers is committed to be engaged with the rest of the sector via peer learning and knowledge sharing.</p> <p>As in previous years, the answer can be overall seen as Good Practice for other CSOs, including the numerous examples and evidence provided.</p>

NGO4	<p>Gender and diversity <i>Fully addressed</i></p> <p>Sightsavers' Empowerment and Inclusion Strategic Framework was launched in 2015 to provide a framework on social inclusion and to identify the main areas of the organisation's future work. The strategic alignment process (SAP) allowed for the conceptualisation of this framework. Sightsavers can also be particularly commended for the data disaggregating efforts – be it pilot project tests in India and Tanzania or influencing those responsible for developing methodologies to measure SDG implementation. Their own data shows over achievement of set targets and led to similarly ambitious aims going forward.</p> <p>While the organisation will continue to explore how to engage with other marginalised groups, the short- to medium-term focus will be on gender and disability.</p>
NGO5	<p>Advocacy positions and public awareness campaigns <i>Fully addressed</i></p> <p>A commitment is made to research- and evidenced-based policy positions derived from within the organisation and from outside. It is very much appreciated that, to ensure continued consistency in this area, a Policy Development Guide (shared with the Panel) was rolled out in 2014. It aims at promoting good practice in policy development and seeks to draw a closer link between the policy change desired and the policy paper. The Panel looks forward to the final policy which is managed by the Policy and Global Advocacy Directorate (PGA).</p> <p>No corrective adjustments took place in 2015 and Sightsavers plans to develop an exit strategy as part of their 10-year campaign vision.</p> <p>Finally, it is regarded as Good Practice that Sightsavers publishes all policy positions on their website.</p>
NGO6	<p>Coordination with other actors <i>Fully addressed</i></p> <p>Engaging with and leveraging their strategic networks is a strategic priority for Sightsavers. The SIM card also shows great progress so far. They describe the different categories of partners and how they work to improve their evidence-base to demonstrate that partners have the increased capacity to sustain programme activities.</p> <p>The visualised partnership framework (page 21) including individual toolkits for the three phases is seen as Good Practice for other CSOs. It is assumed that due diligence described in this project also ensures that partners meet the Charter's accountability criteria.</p>
II. Financial Management	
NGO7	<p>Resource allocation <i>Fully addressed</i></p> <p>Sightsavers' strong resource allocation and financial control framework was mapped out in detail in the 2013 report. Structural changes were made in 2014 to strengthen programmatic strategic alignment and allocation of resources. The new programme database (Programme Portal) provides quarterly reporting of</p>

	output statistics and enables progress assessment of both financial and programmatic outputs in tandem. Actual figures would underline the narrative.
NGO8	<p>Sources of Funding <i>Fully addressed</i></p> <p>Sightsavers has a strategic objective of growing and diversifying income, e.g. increasing income from institutional donors, driven by a desire to increase organisational activity and maximise impact. This has been successful in recent years as one can see in the narrative and figures provided.</p> <p>68% of Sightsavers' overall income comes from a gift-in-kind contribution from Merck and Co. As asked in 2014, in light of how Merck might present their charitable contribution, it would be interesting to know if the value listed are the actual market prices or the value prices that Merck provides.</p>
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations <i>Fully addressed</i></p> <p>Sightsavers can be overall commended for significantly reducing their greenhouse gas emissions – particularly due to moving to a more energy-efficient office building in 2014. The figures provided only apply to the head office in the UK and the Panel looks forward to improvements in the overseas offices. Sightsavers has also committed to aggregate missing data in regard to e.g. water supply, travel by rail/bus/sea or direct emissions in regard to their overseas vehicles.</p>
EN18	<p>Initiatives to reduce emissions of operations <i>Fully addressed</i></p> <p>An Energy Audit was conducted at the head office in 2015 which has helped to identify ways for further energy reductions. Moreover, the Panel welcomes that Sightsavers plans to implement an Environmental Management System (EMS) in the near future.</p>
EN26	<p>Initiatives to mitigate environmental impact of activities and services <i>Fully addressed</i></p> <p>Interesting initiatives are listed to reduce or mitigate the organisation's environmental impact (e.g. multi-passenger vehicles, remote IT infrastructure, bicycle lockers, timer settings etc.). Sightsavers hopes to receive emissions reports from DHL to report on those omitted by their transportation supply chain.</p>
IV. Human Resource Management	
LA1	<p>Size and composition of workforce <i>Fully addressed</i></p> <p>Sightsavers provides interesting figures broken down in contract types, region and specifics on volunteers. It would moreover be helpful to see the ratio between different responsibility levels within the organisation.</p>
EC7	<p>Procedure for local hiring <i>Fully addressed</i></p> <p>As asked two years ago, a link to the described Global Diversity and Equality Policy, making the commitment to employ a workforce that reflects the diversity of local contexts and culture, would be welcome in the next full report. Moreover, while the Panel is aware of market forces, which guidance does Sightsavers</p>

	<p>follow in order not to undermine the local CSO or public sector? For example, openly sharing information as well as joint assessments, trainings and evaluations can help to break down any barriers between Sightsavers and local organisations.</p> <p>Overall, Sightsavers can be commended for high percentages of locally hired staff (between 78% and 100% of senior managers throughout the different regions).</p>
LA10	<p>Workforce training <i>Addressed</i></p> <p>Training needs are identified at the individual level, i.e. through Development Reviews, and through the HR Operations Team and HR Business Partners. In 2015, the average spend on training was 2.5% of total salary cost which was over the 2% target. The target was now set to 3% for 2016. Apart from the volunteers mentioned in LA1 – how many staff members have received training in 2015?</p> <p>Does Sightsavers have evidence that their mechanisms for staff development work well in practice and have yielded as envisaged improvements?</p>
LA12	<p>Global talent management <i>Addressed addressed</i></p> <p>The employee survey 2015 highlighted the need to improve Sightsavers' current performance development process and the Panel welcomes progress in this regard. Might this dissatisfaction be the reason that only 57% of Performance and Development Reviews (PDRs) have been returned for 2015? Please provide an explanation for this low number in the next report.</p>
LA13	<p>Diversity of workforce and governance bodies <i>Fully addressed</i></p> <p>While the overall gender ratio is almost even (56% male vs. 44% female staff), the imbalance at management level is higher with 69% being male. Ethnicity is better balanced throughout the organisation. Is there data for people with disabilities available? The newly launched Empowerment and Inclusion Strategic Framework is supported in regard to scaling up efforts to achieve greater diversity in the workplace. Is there a concrete target?</p>
NGO9	<p>Mechanisms to raise grievances <i>Addressed</i></p> <p>Sightsavers has a grievance procedure in place which includes an organisational policy (reviewed in 2014) and process for handling grievances. Relevant documents were shared with the Panel in 2015 and it is still suggested to make these publicly available.</p> <p>Were there any concerns raised in 2015 (e.g. to the two new HR Business Partners who support managers to resolve grievances) and if yes, were these resolved satisfactorily in practice?</p>
V. Responsible Management of Impacts on Society	
SO1	<p>Managing your impact on local communities <i>Fully addressed</i></p> <p>The organisation has a Project Design Process (PDP) launched in 2015 and a Reflection, Oversight, Analysis and Review group in place who are the basis for entering new countries or partnerships.</p>

	<p>The process for strategic alignment led to a number of projects identified for exit as outlined in the report. Moreover, Sightsavers provides very interesting insights of the country withdrawal process from Sri Lanka. The disengagement strategy and the summary report highlighting key learning points and good practice are very helpful and it is suggested to share these with the wider public.</p> <p>Finally, the Panel looks forward to progress on the revised Child Safeguarding policy and related training modules planned for 2016.</p>
SO3	<p><i>Anti-corruption practices</i> <i>Fully addressed</i></p> <p>Sightsavers describes a systematic risk analysis including regular fraud and abuse risk assessments which will be further developed to include the risk exposure to anti-terrorism funding and money laundering. The Panel looks forward to being informed on progress in this area.</p> <p>As reported in previous years, Sightsavers does not have a stand-alone training programme for employees on the anti-corruption procedures that have been adopted but rather includes the relevant organisational policies regarding fraud, money laundering and corruption into general staff inductions. The increased number of both referrals on alleged fraud and abuse as well as enquiries indicate an increased level of awareness among staff and partners.</p>
SO4	<p><i>Actions taken in response of corruption incidents</i> <i>Fully addressed</i></p> <p>Sightsavers can be again commended for a very good management of anti-corruption activities – including internal reporting lines and responsibility levels, as well as disclosure and acknowledgement of incidents of corruption.</p> <p>15 allegations of fraud and abuse have been received and investigated since 2013 which involved a financial loss exposure of under 40,000 GBP. Monies paid were recovered and staff involved was formally disciplined or ceased to be employed. In addition: What kind of general measures were implemented to prevent similar cases in the future?</p>
VI. Ethical Fundraising	
PR6	<p><i>Ethical fundraising and marketing communications</i> <i>Fully addressed</i></p> <p>Sightsavers adheres to a broad number of legal national standards and voluntary codes. The Panel appreciates that, as a follow-up to previous Panel feedback, a Global Fundraising and Donations Acceptance Policy was developed in 2015 (and approved in 2016). It is furthermore commendable that Sightsavers' governance webpage includes a focused section on their 'fundraising promise' for transparency and accountability to supporters and beneficiaries.</p> <p>The number of complaints received, broken down in great detail by activity for 2015, is provided. It is positively noted that these complaints are made transparent in line with the Fundraising Standards Board (FRSB) – see here. All complaints received in 2015 were resolved satisfactorily by the Customer Care team.</p>