



**Accountable
Now**

GLOBAL STANDARDS LOCAL TRUST



Sightsavers Independent Review Panel Feedback

**Accountability Report 2017
Review Round August 2018**



Sightsavers

Feedback from the Independent Review Panel

Review Round August 2018

13 September 2018

Dear Caroline Harper,

Thank you for submitting your accountability report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below.

Sightsavers' seventh accountability report is again comprehensive, demonstrating a strong **institutional commitment** to accountability, championed by CEO Caroline Harper and expressed in a convincing opening statement.

Examples of how some policies and processes are applied serve as useful **evidence** of how these work in practice. The Panel has requested similar examples for areas such as minimising negative impacts on stakeholders and stakeholder feedback.

Previous feedback has been taken on board, and the Panel is pleased to see more policies made available on Sightsavers' [website](#) as well as improvement in the areas of staff development and grievances.

Examples of **good practice** include Sightsavers' approach to learning (B2), sustainability and capacity building (E4), policy regarding Complaints and Grievances (J3), transparency (G1), and fair staff recruitment, development, and working environment (H1 and H2).

Areas for improvement are information on key likes/dislikes from beneficiaries (E3), how stakeholders are involved in the advocacy process (F2), and feedback from country offices regarding complaints at the programme level (J3).

Promotion of Accountable Now membership on the Sightsavers [website](#) and reference to Accountable Now's oversight of members' complaints handling in their [Complaints Policy](#) is commended.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with



your report – as it is the case with all previously reviewed reports. 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 any comments or amendments by 11 October 2018. If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Mihir Bhatt

John Clark

Elodie Le Grand

Jeremy Sandbrook



Sightsavers' Accountability Report 2017

Review Round August 2018

Comments on the Executive Summary Report

The executive summary report addresses each of Accountable Now's 12 Commitments, and provides a concise overview of Sightsavers' efforts on each one. The Panel believes this would be useful to share with Sightsavers' stakeholders, and recommends including links to relevant policies/web pages to ensure they are aware of where to access information such as on Sightsavers' strategy, SIM Card, or feedback and complaints mechanisms. For sharing with a general audience we recommend including a glossary of terms and acronyms used (readers may not know what SIB, EC, OECD DAC and perhaps the SIM card are).

Comments on the Full Report

Opening Statement from the Head of Organisation

The report opens with a strong statement from CEO Caroline Harper, highlighting the importance of accountability, particularly in the face of the recent scandals in the aid sector. She points out that Sightsavers has been working to improve its accountability – which is seen as a fundamental requirement for the existence and success of the organisation – for a long time, and highlights key steps taken in the past two years.

The Panel notes positively Sightsavers' efforts to improve the participation of beneficiaries and communities in all stages of its programmes, increase impact, better work with partners, strengthen internal processes, and be more open about failures as well as successes. It is also pleased to see attention being given to the new issue of cyber crime/security - which will become an increasingly important concern for the sector, and hence other AN members will doubtless be interested to learn from your experience.

Cluster A: Impact Achieved

A. The impact we achieve

1	Mission statement and theory of change Sightsavers' vision and operational aim are presented. Four thematic areas have their own strategies, overall there is a focus on working in partnership to
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	increase impact, and it is appropriate that more weight is being given to MEL and research.
2	<p>Key strategic indicators for success</p> <p>Sightsavers' uses its SIM card, which the Panel previously identified as an example of good practice, to track progress against its strategy, with organisational objectives at beneficiary level as well as objectives focusing on partnerships, advocacy, and strategic alliances. Were beneficiaries and communities (Sightsavers' key stakeholders) involved in the process of developing these objectives?</p> <p>Key internal policies and procedures guiding Sightsavers' engagement with different stakeholder groups are also mentioned. The Panel notes positively that partners were involved in shaping the due diligence tools in Sightsavers' Partnership Policy and Framework.</p>
3	<p>Progress and challenges over the reporting period</p> <p>Performance results against SIM card indicators are publicly available on Sightsavers' website. Overall, Sightsavers has achieved many successes in 2017, with significant improvements in several areas compared to 2016 results. These successes are mainly in the areas of inclusivity of women, girls, and those with disabilities, suitability of projects for replication, Neglected Tropical Diseases, and influencing national policies/planning.</p> <p>Key challenges encountered have been mostly due to lack of government funding and commitment.</p> <p>The report also outlines several achievements in terms of external recognition, and the Panel commends Sightsavers on these.</p>
4	<p>Significant events or changes regarding governance and accountability</p> <p>In 2017 three new trustees joined the board of Sightsavers. Programmatic operations in Sri Lanka and the Caribbean were concluded. Sightsavers was also awarded Independent Research Organisation status, allowing the organisation to establish a Research Centre in the future.</p>
B. Positive results are sustained	
1	<p>Sustainability of your work</p> <p>The report states that Sightsavers' primary operating model is to work with partners and to increase the capacity of its partners to deliver sustainable programmes.</p>



	<p>Sightsavers' partnership policy (more under indicator 4.1) defines key principles guiding their work, which are central to ensuring sustainability. The Panel notes positively that Sightsavers' Project Design Process emphasises the importance of integrating sustainability and exit considerations into project design from the start.</p> <p>Useful examples of Sightsavers projects which have had sustainability successes are provided.</p>
2	<p><i>Lessons learned in the reporting period</i></p> <p>Sightsavers has several approaches in place to learn from its successes and failures, including learning reviews, evaluations, learning seminars, and learning events.</p> <p>An example of a learning review conducted in 2017 is provided, and the Panel commends Sightsavers on reviewing the draft report with staff, co-creating recommendations, and disseminating findings through a learning seminar.</p> <p>The Panel also notes positively that project evaluations are used to inform decision making and future planning. Evaluations are publicly available on Sightsavers' website.</p> <p>Ongoing monitoring and oversight of programmes also allows immediate feedback loops into programme management – an example of corrective action taken upon identification of a human resources gap in a project is provided.</p> <p>Sightsavers has also shared its learnings with peers in the sector through presentations, publications, and improving the learning and research sections of their own website.</p> <p>Overall, the Panel sees Sightsavers' approach to learning as a good practice.</p>
<p>C. We lead by example</p>	
1	<p><i>Leadership on strategic priorities</i></p> <p>The report points to high employee satisfaction with leadership and management by the CEO and senior directors, and outlines how internal stakeholders are updated on strategic developments.</p> <p>More information on how Sightsavers provides leadership externally on its strategic priorities would be welcome in the next report (e.g. participation</p>



	<p>in/coordination of international working groups/forums, production of research).</p> <p>It is stated that government and non-governmental partners value Sightsavers as a technical partner, and an example of the Sierra Leonean government requesting Sightsavers' assistance in data collection is provided. Is there evidence that affected populations welcome Sightsavers' efforts?</p> <p>Sightsavers' new Independent Research Organisation status is external recognition of the high-quality research carried out by the organisation.</p>
2	<p><i>Inclusivity, human rights, women's rights and gender equality</i></p> <p>Sightsavers' efforts towards inclusivity and equality focus specifically on gender and disability. Their vision and mission statements reflect a commitment to promoting equality of opportunity for people with disabilities, and the Panel notes positively that the organisational strategy and the SIM include indicators to meet this commitment (with 2017 results showing that targets have been exceeded).</p> <p>A rights-based approach is taken to mainstreaming disability throughout Sightsavers' programmes and operations, with a dedicated Empowerment and Inclusion Strategic Framework. An annual inclusion report highlight both successes and failures and is shared with internal and external stakeholders (available online).</p> <p>The Panel appreciates that Sightsavers is working on improving the disaggregation of programme data by disability in order to monitor the inclusiveness of their health programmes, and also on improving the accessibility of information about these. An example of how disaggregated data has allowed Sightsavers to improve the rate of female cataract surgery recipients in Pakistan is provided.</p>
3	<p><i>Minimising negative impacts on stakeholders</i></p> <p>Sightsavers' work is guided by the UN convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities. There are a range of policies and procedures in place (all available online) including a child safeguarding policy, a slavery and human trafficking statement, and a fraud and anti-corruption policy. These are all reviewed and updated regularly, and are accompanied by a code of conduct, which all staff and representatives of Sightsavers are required to sign. All employees complete an eLearning programme as part of their induction or when new or updated policies are introduced, and there are additional trainings relating to specific</p>



	<p>topics (e.g. child safeguarding). The QSAT Tool is used to assess whether projects are adhering to quality standards.</p> <p>An ethical content policy ensures the organisation does not misrepresent stakeholders or perpetuate stereotypes of people living in the developing world. In 2017 an Adults at Risk framework was developed to support the protection of vulnerable adults during Sightsavers activities, and an accompanying policy will be developed in 2018. A detailed overview of how Sightsavers protects the dignity and safety of persons involved in their research studies is also provided.</p> <p>The report highlights the link between Sightsavers' complaints policy and internal control and assurance mechanisms. The policy, and the organisation's approach to gathering information on complaints from country offices, will be reviewed in 2019. The Panel also notes positively Sightsavers' robust Partnership Policy, which stresses the need to work together openly, learn together, build capacities, share resources, and work towards sustainable outcomes.</p>
4	<p><i>Responsible stewardship for the environment</i></p> <p>A comprehensive overview of Sightsavers' efforts to mitigate negative environmental impacts is presented. These include reduction of paper consumption, recycling, energy efficiency, and working with a climate neutral logistics/transportation provider.</p> <p>While negative environmental areas has declined in several areas, the report points out that CO2 emissions due to long haul flights have increased. It is stated that this is due to increased size and scope of projects – is this a trend that is expected to continue? However comparing 2017 with 2015 information it appears that the increased CO2 is due more to SHORT-haul flights, leading overall emissions (due to flights) to be 40% higher - which could perhaps warrant a fuller explanation. Does Sightsavers have any plans in place to reduce the number of flights taken, or offset carbon emissions for flights?</p> <p>It is stated that Sightsavers does not yet have a systematic approach to assessing the environmental impact of its projects in developing countries, but that while they work towards this, the organisation “operates in a social and environmentally minded manner”. The Panel notes that an environmental survey was circulated to all country offices in 2017, and that results and recommendations for improvement (including targets) will be produced by the end of 2018. The Panel looks forward to reading more about</p>



this in the next report, and would like to know whether an environmental policy will be developed.

Cluster B: Stakeholder Involvement

D. Key stakeholders are identified with great care

1	<p>Key stakeholders and how they are identified</p> <p>Sightsavers' main stakeholders are people with disabilities, particularly those who are blind, and with an emphasis on women and girls. The report states that Sightsavers aims to reach a higher number of females than males, as more women than men are affected by blindness. The particular individuals Sightsavers engages with are largely determined by the programmes they support and the partners they collaborate with.</p> <p>A Programme Partnership Policy and Framework guide Sightsavers' approach to partnership, and a situational analysis is conducted during the project design process to identify key stakeholders for prioritisation in projects. A research strategy also provides guidance on how evidence-based research underpins Sightsavers' advocacy and programmes.</p> <p>The report also points to policies guiding engagement with public and corporate donors. Engagement with governmental and institutional funders is considered on a case by case basis.</p>
2	<p>Reaching out to those impacted or concerned by your work</p> <p>The report outlines Sightsavers' feedback mechanisms, and explains how programmes and interventions are designed to best benefit beneficiaries. Behavior change interventions in several programmes are developed through participatory processes, and Sightsavers is testing the collection of beneficiary feedback during quarterly project visits. Partner and beneficiary feedback is also often fed into the work of Sightsavers' evaluations and research team, and qualitative research is often conducted through peer-led and participatory methods.</p> <p>The Panel notes these efforts positively, and would like to know more in the next full report about how beneficiaries and other stakeholders are involved in broader strategic planning (as well as leadership role in the activities and functions of Sightsavers). Furthermore, are there any challenges in engaging particular groups (such as rural low-income families, urban homeless, and migrants or displaced women and children) and if so how does Sightsavers overcome these?</p>



	The response also describes various avenues through which feedback and complaints are collected – the Panel will address these below under indicator J3.
3	<p>Maximising coordination with others operating in the same space</p> <p>Engaging with strategic networks and alliances is a strategic priority for Sightsavers, with a dedicated SIM card indicator. As mentioned in C3 above, Sightsavers has a solid Partnership Policy, which stresses the need to work together openly, learn together, build capacities, share resources, and work towards sustainable outcomes. It is stated that programme partnerships involve co-design, learning, implementation, and monitoring.</p> <p>Details are given of how partnerships operate in different areas of Sightsavers' work, such as global strategic alliances, programmes, and advocacy.</p> <p>The Panel appreciates that Sightsavers works through the National Taskforce for NTDs (neglected tropical diseases) to plan its work together with other stakeholders to ensure there is no overlap, and that lessons are shared between agencies.</p> <p>The Panel notes positively examples of Sightsavers' expertise in leading complex multi-partner programmes and consortia.</p>

E. We listen to, involve and empower stakeholders

1	<p>Stakeholder feedback</p> <p>Sightsavers' beneficiary feedback approaches are covered under D2 above. The Panel would like to hear more in the next full report about specific methods (e.g. surveys, in-person consultations, any methods geared specifically towards children) and how well these work in practice.</p> <p>Sightsavers' award of first place in the charity section and sixth place overall in the UK Top Customer Service Awards indicates top performance in engagement with the public, and the Panel congratulates Sightsavers on this achievement.</p> <p>As for feedback within Sightsavers, an internal Reflection Workshop, for staff to discuss learning, experiences and best practices as well as key challenges, was held in 2017. A management response mechanism enables country staff to discuss strategic evaluations and provide feedback. An over 95% response rate to Sightsavers' employee survey is provided as an indication that staff feel their feedback will be used by management.</p>
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2	<p>Stakeholder engagement</p> <p>The response explains how Sightsavers' partners are involved in project design, from the initial context analysis and concept stage through to implementation and monitoring. Partners are engaged in workshops at the start of projects to agree on implementation plans, budgets and reporting. Feedback is collected throughout the project during monitoring visits and planning and learning workshops.</p> <p>As for beneficiaries, Sightsavers' Project Cycle Management and Thematic Quality Standards Assessments tools require beneficiary participation in project design. In Sightsavers' NTD work, they developed a community-directed treatment approach, which has led to a significant reduction in transmission of certain diseases.</p> <p>The Quality Standards Assessment Tool is also mentioned as a way to ensure stakeholders are engaged in Sightsavers' activities from beginning to end. The Panel looks forward to reading more in the next report about the findings of their recent review of the tool and about how Sightsavers will continue ensuring that stakeholder engagement remains high and that beneficiaries are more fully engaged.</p> <p>Members of communities in which Sightsavers carries out research are also involved in decision-making and ownership through a community-based participatory research methodology. The Panel appreciates the examples of how this approach has shaped Sightsavers' work on education and inclusion.</p>
3	<p>Main likes/dislikes from stakeholders and organisation's response</p> <p>Key positive as well as critical feedback from donors is highlighted in the response. Sightsavers' donors have had positive responses to programmes where beneficiaries' personal stories are highlighted, particularly the transformational impact on their lives. Donors also appreciate Sightsavers' efforts in creating sustainable programmes, and in disaggregating data by gender, disability, age and poverty level, and sharing these findings.</p> <p>Feedback from a donor in 2017 about how Sightsavers could reach more women in their eye health projects was taken on board, and Sightsavers has taken the issue up with country office teams.</p> <p>Similar information about feedback from Sightsavers' stakeholders on the ground – i.e. beneficiaries and partners – was missing, and the Panel requests an update on this in the next interim report.</p>



	<p>The report also outlines the ways in which Sightsavers incorporates the views of internal stakeholders and partners into its work. This includes evaluation report reviews with country staff and partners, and seeking feedback from evaluators to adjust processes and improve relations. Are there any key findings Sightsavers could highlight in the next full report?</p>
<p>4</p>	<p><i>People and partners have gained capacities that last beyond your immediate intervention</i></p> <p>The response states that Sightsavers has been working to improve its evidence base to demonstrate that its partners have capacity to sustain programme activities. Information and feedback on Sightsavers' sustainability efforts in relation to partners, particularly the importance given to sustainability in Sightsavers' partnership policy, can be found under question B1. The response also highlights that where partner due diligence reveals weaknesses, action plans are created to strengthen and support the organisations, with effects often enduring far beyond the project's life cycle.</p> <p>Several examples are provided of projects which have resulted in increased capacities and new skills for both direct beneficiaries as well as healthcare, educational and social work professionals in the communities Sightsavers works in. These are expected to have long lasting and in some cases life changing impacts.</p> <p>The Panel commends Sightsavers on its approach to increasing capacities amongst its direct beneficiaries, communities it works in, and partners, and flags this as a good practice.</p>
<p>F. Our advocacy work addresses the root cause of problems</p>	
<p>1</p>	<p><i>Evidence regarding the root causes of the problems you address</i></p> <p>Sightsavers' approach to evidence-based research is covered to some extent in D1 and E2 above. Sightsavers' strength in this area was officially recognised in 2017, when it was awarded Independent Research Organisation status. Sightsavers' research strategy guides how evidence-based research underpins its advocacy and programmes. Members of communities in which Sightsavers carries out research are involved in decision-making and ownership through a community-based participatory research methodology.</p> <p>Sightsavers also engages with Disabled People's Organisations at national and international level to ensure the organisation understands and can reflect people's views and experiences.</p>



2	<p>Stakeholders support your advocacy work and value changes achieved</p> <p>In the response, the example of Sightsavers' Put Us in the Picture campaign is provided, where members of the public were invited to take actions such as signing petitions and contacting parliamentary candidates. As stated under E2 above, Sightsavers engages communities and beneficiaries in the research it conducts as well as in project design.</p> <p>However the links between the different stages could be clearer. How does community-led research shape Sightsavers' advocacy positions? How are beneficiaries consulted on the actual advocacy development? Are these people then empowered to take action as well (in addition to the calls for action to the general public)? In the next full report, the Panel requests more details on how key stakeholders/beneficiaries are involved throughout the advocacy planning, implementation and evaluation process.</p>
G. We are transparent, invite dialogue and protect stakeholders' safety	
1	<p>Availability of key policies and information on your website</p> <p>The Panel has previously identified Sightsavers' approach to publishing key policies on their website as a good practice. These include Sightsavers' complaints, grievance, and whistleblowing policies, as well as policies relating to safeguarding, diversity and equality, partnerships, and more.</p> <p>The annual report is also available online and includes detailed financial results. Further details on programme finances are published through the International Aid Transparency Initiative (IATI) – and the Panel notes positively that Sightsavers also points users to more accessible presentations of this technical data.</p> <p>The Panel also commends Sightsavers on their transparency about salaries, with the CEO's salary openly published on the “how we're run” section of the website, as well as information about ratios between top and bottom salaries, and the gender pay gap.</p> <p>Sightsavers also adopted an Open Information Policy in 2016, and this is linked in the report – however, it does not seem to be available on Sightsavers' website, and the Panel recommends including it in the list of published policies.</p> <p>Overall, Sightsavers' approach to transparency remains a good practice.</p>



2	<p>Pay scale, gender pay gap and top salaries</p> <p>The Panel commends Sightsavers on the open information about the ratio between highest and lowest paid employees in the UK – the 2017 ratio is 6:1, and the Panel notes positively that this is a decrease from 7:1 in the previous year. Was there specific effort made to achieve this decrease, and is there a target in place?</p> <p>Sightsavers includes the recruitment and retention of key staff as a key organisational risk on its risk log. Reward packages are set competitively with reference to other similar organisations in the areas where it works. The remuneration committee sets the CEO's salary, approves those of her direct reports, and sets the overall reward structure and policy. The number of UK staff members in various salary bands can be found in Sightsavers' annual report (page 89).</p> <p>The gender pay gap at Sightsavers (an analysis of which is available online under the list of policies) sees men earn 1% more than women when the mean is calculated, and 3% more in median. The report states that this compares well with other organisations in the sector.</p>
3	<p>Ensuring privacy rights and protecting personal data</p> <p>Sightsavers' website terms and conditions and privacy policy (available here) details what information Sightsavers collects, what is done with it, how it is kept secure, and how to amend preferences such as cookies or methods of communication.</p> <p>Sightsavers has been working to ensure it is compliant with the EU General Data Protection regulation, and is currently seeking Cyber Essentials accreditation (a UK Government scheme to help organisations defend against online threats).</p>
4	<p>Largest donors and their contributions</p> <p>The report lists (under questions 9.1) the five largest cash donors and their contributions for 2017, with figures for 2016 provided for comparison. It also points out that the two "in kind" donations combined account to over three-quarters of their income. One of these (from Merck) is listed but the other is not.</p>



Cluster C: Organisational Effectiveness

H. Staff and volunteers are enabled to do their best

1	<p>Recruitment, employment and staff development is fair and transparent</p> <p>The report includes a detailed breakdown of staff across Sightsavers based on contract type (full/part time), seniority, local hires (why are figures on UAE not included in this table?), gender, ethnicity and age. The Panel notes that almost two thirds of Europe based staff are female, whereas the opposite is true in most other regions. Does Sightsavers have any targets or processes in place to address this imbalance? It would also be interesting to know the proportion of men and women in management positions.</p> <p>Sightsavers' Global Diversity and Equality Policy makes a commitment to employing a workforce that reflects the diversity of local contexts and cultures. The Panel commends Sightsavers on its efforts to hire locally, with all senior managers hired locally in 2017.</p> <p>An objective in the Empowerment and Inclusion Strategic Framework is to increase efforts to achieve diversity in the workplace (explanation of the different categories would be welcome in the next report, e.g. White British is mentioned; do coloured English staff fall under one of the other listed categories?). This is being pursued by a social inclusion working group which has organised lunchtime talks, training and learning opportunities, and the creation of accessible documents for staff.</p> <p>The response also outlines Sightsavers' efforts to create fair and attractive interview and work environments for people with disabilities. A disability data survey was conducted for the first time in 2017, and it is planned to continue gathering and tracking data to be able to understand the impacts of initiatives in this area, as well as areas for improvement.</p> <p>Overall, the Panel commends Sightsavers on its approach in this area, and recognises it as good practice.</p>
2	<p>Staff development and safe working environment</p> <p>Staff development is managed by senior managers and line managers, and is supported by two HR Business partners. The response details the different development opportunities available to staff, including in-person training, online training through the global eLearning platform, workshops, seminars, and informal mentoring opportunities. There are also dedicated resources for</p>



	<p>managers, such as knowledge cafes and inductions for new managers. All employees have access to a 24-hour confidential Employee Assistance Programme which provides support and advice.</p> <p>Sightsavers' performance review process was updated in 2017, with a new Valuing Individual Performance system introduced. This was developed in a consultative process, and will see staff undergo formal development reviews every 12 months, with reviews conducted on a rolling basis. Sightsavers' 2018 employee survey includes questions relating to performance management, which are hoped to provide insight into how staff engage with the new process compared to the old system.</p> <p>In terms of ensuring a safe working environment, relevant policies include global policies on Discrimination, Bullying and Harassment, Physical Security, and Equality and Diversity. The policies appear to be comprehensive and sound, covering a broad range of behavior, including examples, and making clear that harassment may include behaviours beyond those explicitly stated. Informal as well as formal procedures for resolving complaints are outlined, with reference to the Global Grievance and Whistleblowing policies and procedures; these state employees' right to raise concerns without fear of retribution. The Panel would also be interested in seeing the Code of Conduct mentioned earlier in the report, and suggests this be made available on Sightsavers' website.</p>
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I. Resources are handled effectively for the public good

1	<p>Resources are acquired in line with your values, globally accepted standards and without compromising independence</p> <p>A Global Fundraising and Donations Acceptance Policy (annexed to the report) guides Sightsavers' fundraising operations to ensure compliance with the law and Charity Commission guidelines. The policy covers all third-party donations, and above a threshold of 10,000 GBP, donors are subject to policy guidelines which protect Sightsavers' independence and ensure funds are not obtained in a way contrary to the organisation's beliefs. The policy did not touch on the issue of commercial sponsorship or whether corporate donors are permitted to gain publicity for their gifts or use Sightsavers' logo in any way. Is this covered elsewhere or not relevant to the organisation?</p> <p>Sightsavers is a member of the Fundraising Regulator, Direct Marketing Association, and the Institute of Fundraising in the UK. Membership of other national regulatory bodies is listed in the Fundraising policy.</p>
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	<p>The Panel notes positively reference in the policy, as well as on Sightsavers website, to efforts to protect donors' data, privacy, and communication preferences.</p> <p>Information is provided on different sources of income (individual donations, institutional grants, and gifts in kind) and how these have been increasing year on year.</p>
2	<p>Monitoring of progress and re-allocation of resources</p> <p>A comprehensive overview is provided of how Sightsavers measures progress against strategic objectives, and assesses allocation of funds. The Panel sees the overall approach as being strong.</p> <p>The SIM Card is used to track organisational strategic performance, and strategic priorities drive resource allocation, with the process led by a senior management Strategy Team.</p> <p>Sightsavers' Programme Portal provides quarterly output statistics and enables assessment of programmatic and financial outputs in parallel. The Project Reporting and Oversight process allows for changes to project design and funding during the implementation/monitoring stages. Large grant funded projects are also reviewed quarterly with key stakeholders to discuss programmatic and financial issues.</p> <p>New programmes are planned separately from existing programme implementation to ensure decisions (including resource allocation) are made from a purely organisational perspective. A strategic decision making body meets quarterly to review options put forward by technical experts and country teams, and resources are allocated during the annual planning process.</p> <p>The Panel notes positively Sightsavers' focus on efficiency and value for money. Programme delivery and administrative structures have been streamlined and simplified, leading to savings of around 250,000 GBP per year. Fundraising is driven by an assessment of performance across locations in which Sightsavers operates, with an aim to maximise return on investment.</p>
3	<p>Minimising risk of corruption, bribery and misuse of funds</p> <p>The report details the ways in which fraud/corruption are prevented, detected, and how the organisation responds.</p> <p>Sightsavers' Fraud And Anti-corruption policy (annexed to the report) outlines the definition of fraud, and Sightsavers' approach to prevention,</p>



	<p>detection, reporting and investigation. Both staff and partners are informed about and required to comply with the policy, and staff are required to undergo regular training.</p> <p>Sightsavers' Audit Committee as well as External Auditors assess fraud risk, and the organisation's Financial Framework forms the principal mechanism to prevent and detect fraud. An increase in referrals and enquiries about fraud both from staff and partners indicate that the policies and processes are well known and embedded across Sightsavers and partner organisations.</p> <p>It is stated that the investigation mechanism and inter-partner liaison are working effectively, and the report cites the number of allegations/incidents and what actions were taken in response in recent years. How many of the 21 allegations occurred in the reporting period, and how many of these were substantiated?</p>
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J. Governance processes maximise accountability

<p>1</p>	<p>Governance structure and recruitment of trustees/board members</p> <p>Sightsavers has a governing Council of Trustees with 15 members. Members are listed online under "UK Board". A governance overview on Sightsavers' website also refers to boards in eight other countries, and management and strategy teams. In the next full report, the Panel requests more information about how these different bodies interact with one another. Information on how the Council interacts with management is provided under section 11.1 of Sightsavers' report.</p> <p>Trustees are recruited "based on a review of skills and attributes to ensure a balanced and diverse board". Are there targets in place e.g. relating to gender, disability, age, or geographic representation? If so, how is Sightsavers on track to meet these?</p> <p>The Council of Trustees evaluates itself every other year, and individual Trustees are evaluated by the Chair and Vice Chair every two years. While no trustee has been dismissed from the Council, the report states that governing documents provide a process to do so, for a range of reasons.</p>
<p>2</p>	<p>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</p> <p>Sightsavers' Council of Trustees has global authority over organisational strategy, and it is stated that the governance structure allows flexibility and responsiveness to changing conditions whilst conforming to an overarching</p>



	<p>vision and mission. More information is provided under section 11.1 of the report, outlining the distinctions between the roles of the Council and management and the different committees of the Council and management teams.</p> <p>The report states that while there are no formal mechanisms for employees below executive level to provide recommendations to the Council of Trustees, informal opportunities exist, as well as formal opportunities to provide recommendations to the Management Team.</p>
3	<p>Complaints handling mechanisms and overview of complaints (internal and external)</p> <p>Sightsavers' Complaints Policy for external complainants covers the definition of a complaint, the process including response times and escalation options, and contact details. The complaints handling procedure follows the principles of the UN's 'Protect, Respect and Remedy' framework.</p> <p>Section 4.2 of Sightsavers' report includes more information on the complaints process, and the Panel notes that complaints influence Sightsavers' approach to assurance.</p> <p>It is stated that no complaints were received from programmes at country level in 2017, but that a review of the process determined that the mechanism should be strengthened in 2018 to ensure complaints are not missed. The Panel considers it highly unlikely that there have been no complaints of a programme nature in any country and looks forward to an update on efforts around this, including how Sightsavers makes its complaints policy known (beyond its publication on the website) in the next interim report. The Panel would also like to see information on non-fundraising related complaints received at international level (e.g. those not related to fundraising or country programmes) in the next interim report.</p> <p>An overview of fundraising related complaints is provided, broken down by fundraising category. It is stated that all complaints were resolved satisfactorily by the Customer Care team.</p> <p>Section 4.2 of the report also describes complaints mechanisms for internal stakeholders – the Grievance Policy and Whistleblowing Policy, as well as guidance around acceptable behaviour in the Discrimination, Bullying, and Harassment Policy. One complaint was made through the grievance process in the reporting period and resolved satisfactorily. Were there any complaints under the whistleblowing process?</p>



K. Leadership is dedicated to fulfilling the 12 Commitments	
1	<p><i>The governing body and management are held accountable for fulfilling strategic promises</i></p> <p>The importance of accountability and Accountable Now's 12 Commitments are championed by Sightsavers' CEO Caroline Harper, who is Vice-Chair of Accountable Now's Board. Transparency and value for money are a standing agenda item for the management team, and reflection about and input into the accountability report involves all key managers. Feedback is considered and acted upon by management and the CEO.</p> <p>As covered above under J1, the Council of Trustees undergoes self-evaluations as well as individual evaluations of Trustees by the Chair and Vice Chair every two years. The Council conducts an annual appraisal of the CEO, here she is held accountable for delivery of management objectives. The Council also holds the management team to account on commitments to accountability and transparency.</p>
2	<p><i>Inclusion of staff in discussing progress toward organisational accountability</i></p> <p>The accountability report is produced with contributions from various functions within Sightsavers, ensuring accountability is embedded within the organisation. Are contributors to the report consulted on a draft of the report, and is feedback invited before the report is finalised? This is a strong approach taken by some of Accountable Now's members.</p> <p>The accountability report is circulated internally together with the feedback received from the IRP. Are there follow-up discussions about successes and challenges? Are there examples of how staff input has shaped decision-making or processes?</p> <p>An internal transparency working group (composed of representatives from programme, finance and operations departments) meets quarterly to track engagement with transparency and accountability initiatives within the organisation, and ensure they are linked together and disseminated.</p>
3	<p><i>Scope of this accountability report and influence over national entities</i></p> <p>The report covers the activities of Sightsavers' eight subsidiary entities in addition to Sightsavers International and its regional and country offices. The Panel appreciates this comprehensive approach to reporting. It is mentioned that in 2017 Sightsavers has taken steps to drive the accountability agenda forward internally, exploring the increased incorporation of IATI processes in country offices and programmes. There are</p>



	also plans to introduce partner organisations to IATI reporting. The Panel looks forward to reading about these initiatives in the next full report.
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