

INGO Accountability Charter Annual Report 2011

Completed by:
Jon Farrant
Programme Reporting and Control Manager

Email: jfarrant@sightsavers.org
Telephone: 01444 446704

Information on numbering

As a member organisation of the INGO Accountability Charter, Sightsavers is required to produce an annual report compliant with the Global Reporting Initiative to a Level C standard. A reporting template is provided for this purpose and this template has been used to construct this report.

All sections are taken directly from the original English version of the NGO Sector Supplement and the original reference numbers and page number appear in parenthesis. The NGO Sector Supplement is available for free downloading at www.globalreporting.org

1. Strategy and analysis

1.1 Statement from the most senior decision-maker of the organization [GRI NGOSS: p. 25]

Sightsavers first published a 'Sustainability Statement' in June 2011. Having joined the INGO Accountability Charter at the very end of 2010 we were not yet in a position to make a full report, but wanted to make a clear public statement about our commitment to sustainability – which for us meant being a responsible global citizen, an organisation that people trusted and a great place to work. Obviously we are looking for sustainability in our programming, but this statement embodied a deeper organisational commitment.

Many corporations write sustainability statements to demonstrate how they will endure long term – when of course for Sightsavers the ultimate aim would be for us no longer to be needed. Unfortunately, that situation is unlikely to exist for many, many years, and in the meantime we believe sustainability, certainly as we have defined it, is critical.

Our vision is of a world where no one is blind from avoidable causes, and where visually impaired people participate equally in society. We are an international organisation working with partners in developing countries to eliminate avoidable blindness and promote equality of opportunity for disabled people.

Our strategy is encapsulated by four change themes – divided into 'ultimate aims', which if achieved would mean we had completed our mission, and 'shorter term aims', which we intend to achieve over the planning horizon we have set ourselves (until 2018). In some countries where we work we hope to get close to the ultimate aim during that period, and where we do we will be able to exit from that country.

The four change themes are set out in this report, covering health, education, social inclusion and community development, as they relate to our overall vision and mission. The implementation and management of the strategy is covered by our 'SIM card' (Strategy, Implementation and Monitoring Card), a balanced scorecard which includes a strategy map and indicators and targets for each objective. We have an interactive dashboard on our intranet which captures these measures and is the primary tool used by the senior team for monitoring performance. We intend to put this dashboard on our website in 2012 for full transparency. A copy of the strategy map is attached.

In terms of sustainability, our Statement from last year captured three aspects.

As a **Responsible Global Citizen** we considered our impact on the communities where we work, on the environment and the promotion of ethics in our engagement with others. We set out our environmental policy in brief, including a commitment to develop methods to assess our environmental performance. We committed to development of local staff where possible rather than using expatriates, and to aligning our work with national government plans rather than developing parallel systems. We partner with ministries of health and education in all the countries where we work. We are members of the Inter Agency Procurement Group, which sets out standards we expect our suppliers to follow.

As an **Organisation that People Trust** we outlined our financial policies and procedures (our financial framework is posted on our website), explained how we protect

against and root out fraud (including whistleblowing policies), manage risk and monitor and evaluate programmes and campaigns. Our approach to community participation and accountability to supporters and beneficiaries is briefly described (including our child protection policy). We also set out our governance and leadership structure.

As a **Great Place to Work**, we set out our approach to health, safety, security, equal opportunities, recruitment, learning and development and performance management. We have a biennial staff survey and assessment of our board performance.

The Sustainability Statement is available on our website.

In addition to being signatories of the INGO Accountability Charter, we have committed to reporting under the International Aid Transparency Initiative (IATI) by 2013. We consider the INGO Accountability Charter to be very important as an external benchmark – internal statements are useful but having an externally reviewed report, with the ability to learn from the best practice of other members is invaluable. Because we value the charter I have volunteered to be on the board of the organisation, and was very pleased to be elected onto it earlier this year.

We have set a range of targets for ourselves over the next few years, at the outcome level (as part of our SIM card) and more broadly. Our SIM card targets for the next year are mostly set – one or two are being reviewed at the time of writing of this report. Our goals over the next 12 months are articulated in our Annual report and accounts, which will be posted on our website within the next few months (after our AGM).

In essence we will be looking to stretch ourselves in terms of all fourteen of the SIM card objectives, and specifically our top priorities for the next few years are to

- Become recognised leaders within neglected tropical diseases, both in terms of our reach and delivery to beneficiaries, and in our influence on donors and policy
- Place a major focus on programme quality – undertaking clinical assessments with our partners, improving our programme and grant management capability, developing our M&E, quality and impact assessment systems and accessing more technical expertise.
- Take a more systematic approach to strategic alliancing, to amplify our voice in advocacy, be more effective in our programming and develop more innovative engagement with the private sector.
- Undertake significant work around the ‘value for money’ agenda, in terms of cost effectiveness, cost minimisation and cost/benefit analysis, both to improve our programmes (to do more for less) and to make better investment decisions
- Ensure our governance and management structures and our internal processes remain fit for purpose as the world changes.
- Expand our policy and research work, so we are confident that we speak not just with conviction but on the basis of hard evidence.
- Diversify our funding – expanding internationally, through institutional funding and via a new digital strategy. Whilst maintaining and nurturing our existing markets!

A number of trends will clearly have an influence on our work. In our recent mid term strategic review we identified a number of key ones:

- the global power shift towards BRICS countries (leading us to question how we operate in India in particular), and the challenge of whether to focus on the poorest countries or the poorest people (the LIC vs MIC debate)
- the increasing role of the private sector particularly in health care – how should we engage?
- the question of the longer term role of INGOs (as some donors seek to disintermediate) and changing governance pressures, which lead us to question our place in the world (and which makes the sustainability question very acute)
- Increasing volatility and instability, both economic and political, leading us to strengthen our risk management and mitigation strategies
- Technology development – with opportunities in digital space for fundraising, campaigning and back office support and technological opportunities in our programmes, but also challenges as donor expectations rise (expectations to track every £1 to the ultimate donor?)
- Increasing demands for value for money and impact assessment – whilst we have good core systems we are still not where we would like to be in this arena.

The above trends will have a bearing in both the longer and shorter term, and our strategy must clearly take account of them. Meanwhile it remains important to reflect on what has been achieved over the reporting period, and what the challenges have been.

In essence it was a spectacular year for the organisation, with dramatically increased profile via Comic Relief and a record breaking Financial Times Seasonal Appeal, a 20% increase in income, and the securing of our first PPA from DFID, which was important to us as much for its validation of our new strategy and continuing journey from charity to development organisation as it was for the money.

We have seen dramatic increases in a number of our key outputs, notably around neglected tropical diseases, and have seen improvement in most of our outcomes as measured by the SIM card. We have been pleased at the introduction of a number of new processes, particularly in financial management, which have made huge improvements, and what appears to be a very positive bespoke leadership course for Country Directors (anecdotal evidence – we need to assess this formally).

It has not, however, all been straightforward. We are acutely aware of stresses in the organisation as we move to a more rigorous environment of higher levels of grant funding. We need to improve our programme monitoring and management – some of our more complex programmes were not risk assessed well enough at the outset and we have been slower than we would like in delivering against the logframes. We have at times been over exuberant in our promises to donors and have learned to curb this tendency and be more realistic in what can be achieved and over what timeframe. A new Commitments Management Process has helped here. We have also not used learning as well as we could have across the organisation, and therefore have tended to operate in a more ‘siloesd’ way than is desirable.

We have struggled to retain some key technical staff – as our profile has risen so too has that of some individuals and we have lost a number of them to larger or more specialist agencies. Our social inclusion and education work has lagged behind our eye health work, as we tend to play to our strengths, and until the middle of the year lacked the resource to bring clarity to our programming in these areas. In the same way, we are

behind where we should be on our research and evidence gathering, as it took us a long time to bring on the right Head of Research and then to staff her team. We are, however, making progress in this arena now.

In short, it has been a great year, but there remains much to do, and we are not complacent. As newcomers to the INGO Accountability Charter we expect to learn from others far more than we could teach – but are always happy to share any of our experiences if these can be of help.

Dr Caroline Harper
CEO
Sightsavers

2. Organisational profile

2.1 Name of the organisation [GRI NGOSS: p. 26]

The organisation is known as Sightsavers.

2.2 Primary activities [GRI NGOSS: p. 26]

Globally, 285 million people are blind or have low vision, yet 80 per cent of this is treatable or preventable. Sightsavers' vision is of a world where no one is blind from avoidable causes and where visually impaired people participate equally in society. Through the realization of this vision, Sightsavers hopes to contribute to the achievement of the Millennium Development Goals (MDG).

This vision is implemented through Sightsavers' four Change Themes, which focus on reducing poverty through building health and education systems, supporting disabled people and rooting our work in community development. Each Change Theme has an ultimate aim and specific aims set for the current strategy period, ending December 2018 (see table below). Under these, are 14 objectives to ensure all our efforts contribute to these aims, each of which has at least one lead (process) and one lag (outcome) indicator. The combination of these aims and objectives forms the Strategy Implementation and Monitoring (SIM) Card. This leads on to the Strategy Map (see diagram below).

External aim drivers	Ultimate Aim	Aim to 2018
Change Theme 1 - Blindness increases the likelihood of poverty, exclusion and early death - 75 per cent of visual impairment is preventable - Avoidable blindness is best eliminated by aligning eye health with health systems	Governments ensure good quality eye care is universally available as an integral part of the health system	Sightsavers will demonstrate approaches to eye health which are scalable, adaptable and cost-effective
Change Theme 2 - A third of the 75 million children out of school are disabled yet access for disabled children is not a policy priority in many countries - MDG 2 cannot be reached without the specific inclusion of disabled children - A quality education is key to empowerment and people raising themselves out of poverty	Governments ensure all disabled children receive a quality education within the wider education system	Sightsavers will demonstrate approaches to delivering high quality education for visually impaired children in their local context, which are scalable, adaptable and cost-effective
Change Theme 3 - 20 per cent of the world's poorest people are disabled, yet many governments do not have effective policies to address disability issues - Disabled peoples' organisations (DPOs) are not always strong enough to press effectively for change	Visually impaired people are equal members of society and governments implement obligations under international conventions for	Sightsavers will enable blind and disabled people's organisations to become more effective in pressing for government services

- Disability does not feature prominently in the general development agenda	disabled people	
Change Theme 4 - Communities are not always aware of their own health needs - Visually impaired people are not always included in community development programmes - Eye health programmes reduce poverty and improve the quality of life of individuals	People actively seek eye health services and enjoy a change in quality of life through community development programmes	Sightsavers' eye health and social inclusion programmes will be deeply rooted in community development

Sightsavers works towards those goals set out in the SIM card, collaborating at all times with partners in the countries where it works. Sightsavers works together to deliver the programmes and provides a mixture of grants, capacity building, training and expertise as well as ensuring that the work is well managed and beneficiary and supporter requirements are met.

Sightsavers work involves considerable amounts of service delivery – as a key building block of both health and education systems – but this service delivery is done in the context of local systems, strengthening rather than competing with them. The aim is 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.

Sightsavers gathers evidence that its 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 agencies working in eyecare (many of whom are members of the International Agency for the Prevention of Blindness, who work together with the World Health Organization on the VISION 2020 programme) and increasingly with others such as HelpAge International, African Medical and Research Foundation (AMREF) and WaterAid.

For many years, Sightsavers has been involved with the control of onchocerciasis (river blindness) and trachoma and the strategy is now moving into an elimination phase rather than just control. These diseases are part of an international focus on 'neglected tropical diseases', with diseases amenable to mass drug administration (MDA) being treated together. Sightsavers is deeply involved with this initiative, and is now treating lymphatic filariasis, schistosomiasis and soil transmitted helminths alongside the blinding diseases where they are co-endemic. This is highly effective for the communities concerned and meets the requirements of donors. Sightsavers' approach using community directed treatments is being taken up widely and has great potential for the treatment of other diseases such as malaria. It is however important to recognise that, particularly for trachoma, MDA is not the full answer, with trichiasis surgery a critical part of avoiding blindness, and water and sanitation key to long term success.

Further information on Sightsavers' activities in 2011 can be found in the Annual Review, which is available on the website.

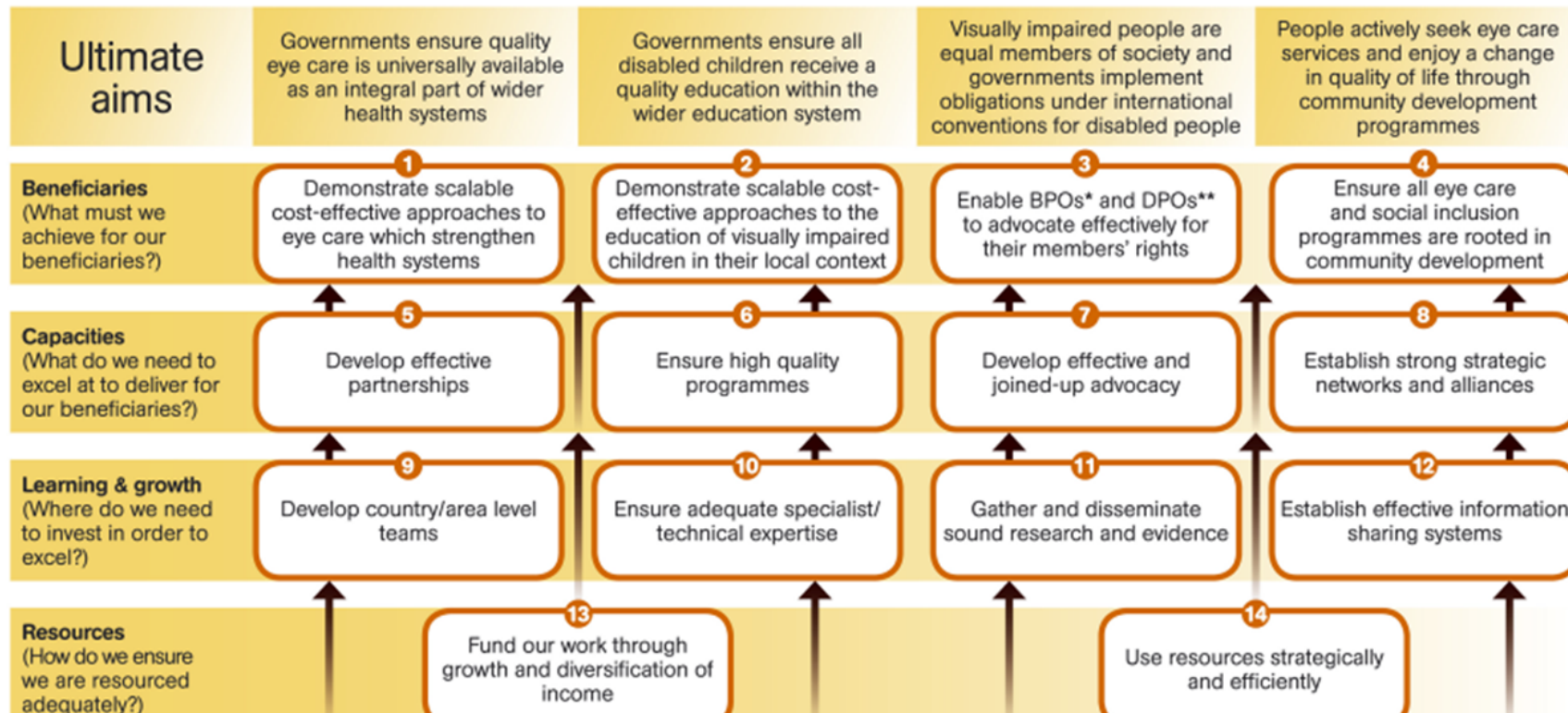


Sightsavers

The Sightsavers SIM Card (Strategy Implementation and Monitoring Card)

The Strategy Map

Our vision: No one is blind from avoidable causes; visually impaired people participate equally in society
Our mission: To eliminate avoidable blindness and promote equality of opportunity for disabled people



2.3 Operational structure of the organisation [GRI NGOSS: p. 26]

Sightsavers is an international non-governmental organisation headquartered in the UK. The organisation is governed by a Council of Trustees, which oversees Sightsavers' operations whilst delegating day to day management to the Strategic Management Team (SMT). The SMT consists of the Chief Executive plus representatives of the six directorates of the organization. These are Programmes, UK Funding and Marketing, International Fundraising Development, Human Resources and Organizational Development, Finance, Planning and Operations and Policy and Strategic Programme Support.

Management within the Programmes Directorate is split into four regions (including India) and below this by country/area. Details of the countries in which Sightsavers operates 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 – registered in the UK. The principal activities of the company are the sales of Christmas cards, promotional merchandise and receipt of corporate sponsorship.
- Sightsavers International Inc – registered in the USA.
- Sightsavers International (Ireland) – registered in Ireland.
- Sightsavers International (Italia) – registered in Italy.

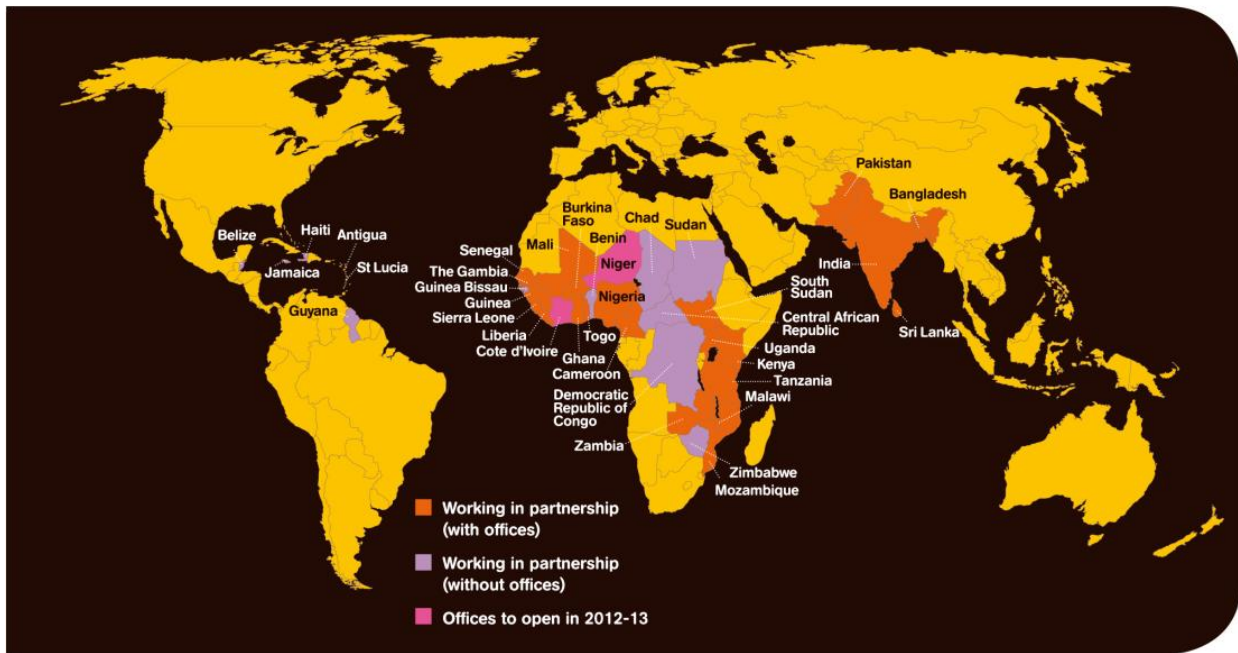
2.4 Location of organisation's headquarters [GRI NGOSS: p. 26]

Sightsavers' head office is located at Grosvenor Hall, Bolnore Road, Haywards Heath, West Sussex, RH16 4BX, United Kingdom.

Contact telephone number: +44 (0)1444 446600.

2.5 Number of countries where the organisation operates [GRI NGOSS: p. 26]

Sightsavers currently works in 34 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) and country offices in 22 of the countries. Sightsavers does not have separate country offices in the Caribbean, where Sightsavers' staff are embedded with the partner, or in Benin, Zimbabwe, Chad, Central African Republic, the Democratic Republic of Congo or Sudan, where the relationship with partners is managed from other country offices. Due to its size, management of our operations in India is divided between four area offices.



As noted in section 2.3, Sightsavers also has funding and marketing activities based in Ireland, Italy and the United States. An office has also been established for this purpose in the United Arab Emirates. Fundraising has also begun in India.

2.6 Nature of ownership and legal form [GRI NGOSS: p. 26]

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

The relationship of Sightsavers and its subsidiaries is complex and different in each case. Sightsavers owns the whole of the issued share capital of Sightsavers (Trading) Limited and the taxable profit is gift aided to Sightsavers. Sightsavers International Incorporated is incorporated as a non profit organization in Delaware, USA. The organization does not have any capital stock, but the Certificate of Incorporation makes clear that the organization exists to support Sightsavers. Sightsavers International (Ireland) and Sightsavers International (Italia) are both limited companies registered as charities in their country of operation and are controlled by Sightsavers through bilateral agreements.

All country and regional offices are branches of Sightsavers, which are registered in their country of operation.

2.7 Target audience and affected stakeholders [GRI NGOSS: p. 26]

Sightsavers is an international organisation working with partners in developing countries to eliminate avoidable blindness and promote equality of opportunity for disabled people. Its potential beneficiaries are people who are blind or have low vision, those at risk of becoming blind and disabled people 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 Sightsavers' partner organisations, other NGOs that it collaborates with, donors and supporters and those governments, institutions and organisations that it seeks to involve in or influence through its work. These stakeholders are primarily based in the countries in which Sightsavers operates, but may be located anywhere in the world.

2.8 Scale of the reporting organisation [GRI NGOSS: p. 26]

As of 31 December 2011, Sightsavers had 383 employees and 143 volunteers. Sightsavers' employees are based in each of the locations described in section 2.5 and undertake all functions to allow the organisation to deliver its programmes. Sightsavers' volunteers are UK based and contribute to fundraising and awareness raising activity in their local communities.

A detailed breakdown of Sightsavers' financial results for 2011 can be found in the Annual Report and Accounts, which is published on the website. In summary, total incoming resources were £161.3m, of which £122.2m was gifts in kind (primarily the donation of Mectizan ® from Merck and Co. Inc.). Total resources expended were £158.7m, split between costs of generating funds (£8.8m), charitable activities (£149.2m) and governance costs (£0.7m). Sightsavers' net assets at 31 December 2011 were £12.4m. This is the net of £16.8m assets and £4.4m liabilities.

2.9 Significant changes during the reporting period regarding size, structure, or ownership [GRI NGOSS: p. 26]

This year has witnessed a number of organisational changes within Sightsavers, reflecting the continued evolution of the organisation to facilitate achievement of the strategic objectives.

In March a new office was opened in Burkina Faso as part of an ongoing effort to rebalance organisational investment in favour of those countries with a lower development index. Programmatic activity has been limited this year, but the foundations are now in place for the development of a significant programme of work in future years.

In April the West Africa – East regional office was closed and the West Africa – West regional office was given responsibility for supporting the whole of the West Africa region. This decision was made following a review of our support structure in Africa and the conclusion that our previous structure involved the unnecessary duplication of some roles. The closure can be seen as part of a broader drive within the organisation for the strategic and efficient use of resources.

Finally, in May, the role of Director of Funding and Marketing was split into two with the creation of a Director of UK Funding and Marketing and a Director of International Fundraising Development. This is to reflect the distinct nature of the challenges of maintaining our support in core markets and expanding our support in new markets.

2.10 Awards received in the reporting period [GRI NGOSS: p. 26]

Sightsavers has not received any awards in the reporting period.

3. Report parameters

3.1 Reporting period for information provided [GRI NGOSS: p. 26]

The reporting period is the calendar year 2011.

3.2 Date of most recent previous report [GRI NGOSS: p. 26]

This is the first report that Sightsavers has produced.

3.3 Reporting cycle [GRI NGOSS: p. 26]

From this point onwards there will be an annual reporting process linked to Sightsavers financial year.

3.4 Contact point for questions regarding the report [GRI NGOSS: p. 26]

Questions regarding the report or its contents should be directed to Jon Farrant, Programme Reporting and Control Manager at the head office address.

3.5 Process for defining report content [GRI NGOSS: p. 26]

Sightsavers' starting point in determining the report content was the set of eighteen indicators recommended for the NGO sector and the Level C Reporting Template produced by the NGO Working Group. This was chosen as INGO Accountability Charter members have been asked to report against all requirements of the template by the Charter Board.

Each of these indicators has been reviewed for materiality to the organisation's stakeholders by assessment against the conclusions of two recent exercises. Firstly, Sightsavers carried out a full strategic review in support of the development of a new Strategic Framework (launched in 2009). This review included a wide ranging consultation of internal and external stakeholders to establish their opinions. Secondly, Sightsavers has been through an internal process to develop a sustainability policy in 2011.

The conclusion of this assessment, in combination with the expressed requirements of the Charter Board, is that all eighteen indicators are material to Sightsavers' stakeholders and so should be reported on. The assessment also concluded that, of the bank of indicators available, these were the most material to Sightsavers' stakeholders and so the reporting framework has not been extended in 2011.

This report is written as an honest assessment of Sightsavers' performance in some key areas. It is anticipated that it will be of fundamental interest to those third parties that Sightsavers interacts directly with i.e. employees, partners and donors. The wider public and other interested parties are secondary intended audiences for the report. Finally, Sightsavers hopes that by making this report publicly available it also has the capacity to be an additional mechanism for our beneficiaries to hold us to account.

The content of the report has also been affected by the information that is already available. This is primarily the Annual Report and Accounts, the Annual Review and relevant policy documents that are published on our website. Where applicable, reference has been made to these other documents.

3.6 Boundary of the report [GRI NGOSS: p. 26]

The boundary of the report has been set to be consistent with the Annual Report and Accounts. The report includes disclosures relating to the head office, regional offices, country offices and subsidiaries. It does not include information on our partners, donors or other stakeholders external to the Sightsavers group.

In some cases, information is not currently available for the whole range of locations identified above. Where applicable, this has been identified in the text associated with the indicator.

3.7 State any specific limitations on the report scope/boundary [GRI NGOSS: p. 26]

The only limitations on the scope/boundary of the report relate to indicator EN16. At present the systems do not exist to allow us to report on carbon emissions relating to energy usage by our offices outside of the UK. It is not clear when the energy providers in these countries will have the facility to do this.

3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organisations. [GRI NGOSS: p. 27]

As described in section 3.6, Sightsavers has included the activities of subsidiaries within the boundary for reporting purposes. Performance of these organizations is included as an integral part of the data presented and is not separately identifiable.

3.10 Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement [GRI NGOSS: p. 27]

This is Sightsavers first report and so there are no restatements to report.

3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report. [GRI NGOSS: p. 27]

As in section 3.10, this is the first report and so there are no scope, boundary or measurement changes to report.

4. Governance, commitments, and engagement governance

4.1 Governance structure of the organisation [GRI NGOSS: p. 27]

Sightsavers has a governing Council of Trustees. The Council is committed to maintaining a high standard of corporate governance. Council members, all of whom are 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. Performance of the Council both collectively and as individual trustees is periodically assessed.

There are clear distinctions between the roles of Council and the Strategic Management Team (SMT) to which day to day management is delegated. Matters such as policy and strategic plans are prepared by the SMT for consideration and approval by Council.

There are four committees of Council: Audit which monitors audit activities, risk and control framework and process effectiveness, Investment which monitors investment performance and treasury activities, Remuneration which monitors remuneration policy and key salary decisions and Governance (formerly Membership) which advises on overall governance structure, monitors legal and registration issues in the countries where we operate 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 ongoing basis.

4.2 Indicate whether the Chair of the highest governance body is also an executive officer. Describe the division of responsibility between the highest governance body and the management and/or executives. [GRI NGOSS: p. 27]

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 SMT 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 it can reasonably do in a given time period. Trustees set the parameters, policies and values within which management and staff are free to act. Once the parameters are set, the staff 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 For organisations that have a unitary board structure, state the number of members of the and/or non-executive members highest governance body that are independent and/or non-executive members. [GRI NGOSS: p. 27]

Sightsavers does not have a unitary board structure.

4.4 Mechanisms for internal stakeholders, shareholders and employees to provide recommendations or direction to the highest governance body. [GRI NGOSS: p. 27]

Sightsavers key internal stakeholders are employees, volunteers and the membership. Sightsavers does not have established, formal mechanisms for employees to provide recommendations or direction to the Council of Trustees. Opportunities are provided by informal opportunities to meet which, in 2011, included the Sightsavers annual meeting. This was held in the UK and attended by representatives of all areas of Sightsavers business and a number of trustees.

Formal mechanisms do exist for employees to provide recommendations and direction to the SMT. In 2011, an employee survey was held that examined the relationship of employees with the organization and the SMT. This was the third such survey which is repeated every two years. The results of this are shared with the Council of Trustees. Sightsavers also operates a global whistle-blowing policy that can be used as a mechanism to provide recommendations to SMT and the Council in instances of wrong doing.

Sightsavers' membership is limited to trustees (and some ex-trustees) who have to be appointed members in order to serve on Sightsavers' Council. As a result, the majority of the membership is already part of the highest governance body of the organization. The primary opportunity for other members to provide recommendations or direction is the Annual General Meeting.

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. The templates used for this feedback include an option for volunteers to provide comments on anything they would like.

4.14 List of stakeholder groups engaged by the organisation. [GRI NGOSS: p. 29]

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.

External stakeholders of Sightsavers include those partner organisations with whom we work to deliver programmes (including local civil society and government ministries) and those agencies, working in eyecare, with whom we collaborate in our programmes, in

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

4.15 Basis for identification and selection of stakeholders with whom to engage. [GRI NGOSS: p. 29]

Sightsavers has a Programme Partnership Policy that sets out the principles behind its 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 Sightsavers applies in the selection of partners. Specifically, the policy outlines certain situations in which we will not enter into partnership with an organisation, including:

- The mission and values are in conflict with Sightsavers' own.
- The organisation intentionally discriminates against people on the grounds of religion, politics, race, tribe, caste, age, disability, gender, ill-health, etc
- Funding the partner would cause conflict or have legal implications for any other existing partnerships or relationships, including with donors.
- The organisation is suspected of furthering its aims through violence or terrorist activities or has some connections with terrorist groups.
- The organisation hopes to use its work with Sightsavers for converting programme stakeholders to any kind of political or religious belief.
- Association with the organisation would risk bringing Sightsavers reputation into disrepute.
- The organisation is bankrupt, being wound up, under administration by the courts, entering arrangement with creditors, has suspended business activities or is a subject of legal proceedings.
- The organisation is not properly registered in accordance with their national requirements or is not fulfilling their obligations under their registration
- The organisation has been convicted of an offence concerning professional conduct in the last 2 years.

Staff are recruited through an open and fair recruitment process and selected based on their fit for the advertised role. In some cases, where an internal candidate is an obvious fit for a role, management does reserve the right to appoint without advertising. The organisation has also recently embarked on a 2-year objective to increase recruitment of people living with a disability (with an emphasis on visual impairment) both in the UK and overseas and is working specifically to engage with these stakeholders. Volunteers are selected based on commitment, skills and agreement to respect Sightsavers' ways of working.

Donors are actively solicited from the general public in the UK and the rest of the world, particularly Ireland, Italy and the United States. Sightsavers' 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 Sightsavers' Corporate Engagement Policy. Sightsavers also solicits and accepts from governmental and institutional funders. Engagement with these donors is considered on a case by case basis.

Sightsavers' engagement with women and men, girls and boys, arises from the circumstances of the programmes we support and our role and that of our partners, and flows largely from the decisions made with respect to the partners with which we collaborate.

Data on performance

Program effectiveness

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

Sightsavers' Strategy Implementation and Monitoring (SIM) Card is the key measure of performance within the organisation and it is used to assess the achievement of the organisational strategy. One of the objectives reflected in the SIM Card is to "Ensure all eye care and social inclusion programmes are rooted in community development". There are three indicators used to assess our achievement of this objective, including a lead indicator of the "Percentage of projects that are designed, implemented and evaluated with the involvement of local communities, including people with disabilities". The current target for this indicator is 60 per cent and our current performance is 54.7 per cent, growing from a low of 26.01 per cent at the end of 2009.

The rationale for the target being at 60 per cent and not higher is that many of the projects that Sightsavers supports are run through the health or education systems of the countries concerned. While these systems may well have patient or pupil feedback systems, these are not currently in place in 100 per cent of project locations. Developing a system of engagement with patients and pupils will take time, but Sightsavers will continue to encourage it to happen as part of its engagement with partners .

The involvement of affected stakeholders in the design and implementation of programmes usually takes the form of engagement with blind and disabled people's organisations (BPOs and DPOs) both at the national and local level. These organisations are often strategic partners of Sightsavers within its programme countries and, for many programmes, will be the implementing partner. This is particularly true for Sightsavers' work in advocating for increased rights and the adoption of the United Nations Convention for the Rights of Persons with Disabilities (UNCPRD). The involvement of affected stakeholders is also common in education programmes..

However, Sightsavers most successful example of the involvement of affected stakeholder groups, is the support provided for Community Directed Treatment with Ivermectin (CDTI) in the treatment of onchocerciasis. This strategy relies on the communities themselves to decide on the mode and time of distribution as well as to select community distributors and supervisors. This approach has been used since 1995 and Sightsavers now has a strategy in place to target elimination of the disease.

With regard to monitoring and evaluation (M&E), Sightsavers is currently institutionalising a new approach to M&E that explicitly follows three key stages: planning, implementation and learning. Affected stakeholders are involved in the planning and implementation and we are working to improve their participation in learning. Further discussion on this new system is included within indicator NGO3.

Sightsavers is currently piloting and refining a new M&E process where, at the planning stage, affected stakeholders are consulted on what key performance questions the project should be monitoring. This is then translated into clear roles and responsibilities for monitoring and evaluation where each stakeholder is matched to key roles they can play during the course of the project. Roles include data collection, participation in evaluations as well as critiquing evaluation findings.

In evaluations, all external evaluators are expected to employ participatory techniques of data collection and we generally have a stakeholder advisory panel for most evaluations. This panel provides support to the evaluator on what issues to consider under the set broad evaluation criteria, amongst other things.

On the design, implementation and monitoring of policies, Sightsavers has not yet been able to involve affected stakeholders as much as desired. What involvement there has been has primarily focussed on advocating for the implementation of policies. This has included involving disabled people in the advocacy for inclusion of disability as a cornerstone of any post Millennium Development Goal environment. Sightsavers is seeking to enter into partnership agreements with the African Decade of People with Disabilities to facilitate more of this.

Sightsavers has involved affected stakeholders in the development of internal, programme policies. In particular, the development of the Programme Partnership Policy was informed by a detailed survey of 39 partners representing the majority of the countries of operation.

In summary, Sightsavers has not yet involved affected stakeholders in a systematic way in policy design or monitoring and evaluation. However, in some programme areas e.g. onchocerciasis control and social inclusion, stakeholders are very engaged throughout the project cycle. Several initiatives (described above) are in the development stage and a budget for this work has been included in the organisational plan for 2012.

NGO2 Mechanisms for feedback and complaints in relation to programs and policies and for determining actions to take in response to breaches of policies

Sightsavers does not have a central, formalised process for obtaining feedback from its implementing partners, although guidelines at a country level about how this should happen are contained within the Programme Partnership Policy (PPP). Complaints are managed on a case-by-case basis. Sightsavers recognises that there is more work to do in this area – in particular being clear to our partners about the mechanisms available to make a complaint.

All of Sightsavers work is done with partners and without them it would be unable to achieve its aims. All partnerships are conducted under a written agreement, these are gradually being replaced with an updated Project Funding Agreement (PFA), which sets out what the partnership is intending to achieve and what the two parties will contribute. A set of partnership tools exists that are used to help Sightsavers evaluate how the partnership is working (and also enable the partner to feedback their views of Sightsavers' performance), the technical and organisational capacity of the partner, including any areas of development, and the strength of its financial controls. These tools, together with the PPP, help Sightsavers to ensure that it is working in the right way, with the right partners.

All Sightsavers' programmes receive ongoing monitoring visits from Country and Regional Directors, the Director of Programmes and others, providing an opportunity for partners to give and receive feedback. Where complaints are made, these are referred in the first instance to the country office with close follow up by the Regional Director to ensure that it is resolved or escalated to the relevant regional office or Director of

Programmes. Anonymous complaints received about country offices are always thoroughly investigated.

Sightsavers has active policies in all major areas of work, including cataract, refractive error, services to blind and low vision children, onchocerciasis, education and community based rehabilitation. These have been translated into Quality Standards which are in the process of being rolled out and will guide the planning and implementation of all programmes.

Quality is particularly important in eye health work, where ensuring high standards of clinical governance can be the difference between sight and blindness. In recognition of this, Sightsavers policy is that the internal quality assurance process at each partner should be reviewed and they should be familiarised with Sightsavers own policies e.g. the cataract policy as part of the development of the project agreement. In addition, Sightsavers is also developing an organisation wide cataract study that will address the issue of quality control.

As part of the increased focus on quality, Sightsavers is appointing a Quality Systems Advisor, due to start in late April 2012. This post will be responsible for the development of a more systematic approach to receiving, analysing and using information to improve quality. This system will range from formal quality assessments through to individual complaints processes, but with the understanding that while Sightsavers can support the process and can conduct assessments, quality improvement must lie in the hands of those with responsibility for service provision, for example health and education ministries.

In addition, Sightsavers has a number of policies which are specifically designed to protect the most vulnerable of our beneficiaries, including a child protection policy which is signed by all employees who work with children.

In terms of complaints, over the past two years, there have been several complaints from internal staff, partners or concerned collaborators e.g. researchers. These are diverse, ranging from specific programmatic issues such as concerns over the quality of services, conflicts of interest, non-compliance with human resource policies as well as issues of late disbursement of funds. Complaints are escalated through country and regional offices to the Director of Programmes and, where necessary the CEO and Strategic Management Team, and are managed on an individual basis.

Sightsavers operates a global whistle-blowing policy, and employees are protected from any victimisation or discrimination as a result of their disclosure, provided they act in accordance with the policy. All complaints are escalated to the Director of Human Resources or CEO or to the Chair if they are about the Director of Human Resources or CEO. Employees may also email direct to a dedicated email address.

The organisational complaints procedure is currently undergoing review, beginning with an analysis of how other agencies manage this challenge.

NGO3 System for program monitoring, evaluation and learning, (including measuring program effectiveness and impact), resulting changes to programs, and how they are communicated

Sightsavers has developed and is in the processes of institutionalising a bespoke system for monitoring, evaluation and learning. The system is referred to as Sightsavers Adaptive Monitoring and Evaluation (SAME) system and is a result of an in-depth organisational situational analysis of M&E that was undertaken in 2007/2008. This drew responses from 40 percent of Sightsavers' employees and was further triangulated through five country visits where staff and partners were interviewed.

SAME is based on three broad systematic processes, namely;

- i. systematic monitoring of progress against Country Strategy Plan (CSP) objectives and project logical framework using key performance questions
- ii. systematic programme evaluations including impact monitoring and measurement
- iii. systematic learning and reflection on findings of M, E and other programme management processes

An important attribute of the system is the adaptive nature, allowing flexibility in the monitoring and evaluation questions used in each location. Each country develops its country level monitoring and evaluation plan through local consultation. As new projects are added to the country programme portfolio, a participatory process which includes consultation with partners is followed to develop the project M&E plan. This is the first of the broad systematic processes outlined above. To date, only a handful of countries and projects have developed these robust plans and further work will be undertaken in 2012 and beyond to embed this practice in line with new organisational project planning processes.

In the case of the last two broad systematic processes, these have been implemented for all Sightsavers offices and projects through a process of systems strengthening.

Currently, learning from monitoring is localised in the countries that have developed/piloted the monitoring plans, but progress is patchy. Though evidence from monitoring is used to report semi-annually, Sightsavers' programmes are still struggling to learn consistently through reflection on the monitoring data. Such concerns were raised in the internal staff survey, particularly around learning from past experience. The Strategic Management Team has therefore made commitments to review this and has set an internal process to investigate and develop a pragmatic approach to learning.

As part of SAME, all evaluations are now based on the Development Assistance Committee (DAC) recommended criteria for evaluating development assistance, while reports have been streamlined in line with the United Nations Evaluation Group (UNEG) guidelines. A key attribute of the evaluations is that critical evaluation questions around the effectiveness and impact of our interventions are now asked as standard. All strategic evaluations are now published on Sightsavers' website and are accessible to all.

Results from SAME, particularly those of evaluations, are summarised into succinct four page publications and shared widely internally in Sightsavers, to partners, and to the general public through the website. These summaries, entitled "Insight", capture the methodology, findings and recommendations from key strategic evaluations. Under the

new system of monitoring and evaluation, there is yet to be a significant change to policy and programmes as a result of findings.

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

Consideration of gender and diversity dynamics and issues has been systematically included in the design and implementation of our programmes since 2011. Prior to this, it was undertaken on a project by project basis, with many projects not incorporating substantive analysis. Since 2011, during the design of projects and programmes, programme staff are required to articulate how they will address specific gender concerns related to that project within the Concept Note. This information is reviewed by the Commitments Management Panel, which forms the basis of approval for all new and continuing programmes.

As would be expected, Sightsavers projects are often focussed on the disability aspect of diversity. This includes projects to support Blind and Disabled Peoples Organisations in our countries of operation, advocating for the adoption of the UN Convention on the Rights of Persons with Disabilities and shadow reporting against the implementation of this.

Sightsavers also considers issues of gender and diversity in its programme monitoring and, as of 2011, Sightsavers' country offices are expected to disaggregate all output data by sex. In 2012, they will also be asked to disaggregated data by age group. In terms of diversity, the only information currently collected is related to those beneficiaries reached with visual impairment (VI) and other disabilities. These are only collected in social inclusion and education programmes, although discussions are now underway about how to include disability disaggregated data in health programmes.

Sightsavers recognises that these processes alone do not necessarily result in programmes fully addressing gender and diversity and is therefore trying to address this in the following way:

A Gender Policy was agreed by Council in July 2011 and operational guidance based on this policy is currently being developed. This guidance will include Good Practice Standards, which will focus on specific actions that need to be undertaken to address the issues and gaps that were flagged up during the gender survey carried out to inform the development of the policy.

Currently Sightsavers does not have specific tools or recommended processes to undertake specific gender and diversity analysis but these will be provided as part of the Guidance that will be produced in 2012.

Sightsavers internal approach to gender and diversity is explained as part of performance indicator LA13.

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

Sightsavers' policy and advocacy work

Policy and advocacy work is an integral part of the programmes and activities we conduct at country, regional and global levels. "Develop effective and joined-up advocacy" is one of 14 strategic level objectives within the SIM card, with indicators for

progress at international and country office levels. International policy and advocacy work within Sightsavers is coordinated by the International Advocacy Coordination Team around agreed themes. A new structure has been developed that will see a cross-departmental group agree the common international advocacy themes for each year. These have been agreed for 2012.

Identifying public awareness and policy positions

Sightsavers aims to ensure that public awareness and policy positions are informed by concrete evidence gathered either from programme work on the ground, or through reviews of literature that is available. The process followed to date to arrive at policy positions comprises of conducting a literature review of available evidence in the policy area of interest; gathering evidence from Sightsavers' own country programmes and partners to inform the development of the policy position; and then developing the policy position, which can then be presented in the form of policy reports, policy papers, or policy briefs. Once a draft of the policy document has been developed, it is shared with technical experts within the organisation and with key country offices for their input and before finalisation it will be shared with the Head of Policy and other relevant members of the Strategic Management Team (SMT) to ensure that the final document supports the aims of the organisation. The research and policy teams work closely together to ensure that the best available evidence is used.

The development of policy documents is led by identified members of the Policy Team who have responsibility for conducting policy and advocacy work in each of the 'change theme' areas that Sightsavers works on. Feedback from country offices is requested to ensure that the policy messaging being produced is consistent with experiences being felt in the field and will not undermine efforts to achieve change themes within each country.

Efforts are also made to ensure positions and messages are directly based on the experiences of people in developing countries. As an example, we are currently conducting research into the views and experiences of disabled people, older people and people living with mental health issues, around the Millennium Development Goals (MDG). This is being done with five other agencies and will inform our work on the post-MDG framework.

The Head of Policy is responsible for providing guidance on the development of policy documents and will be involved on a regular basis throughout their development to ensure that they are meeting the aims of the organisation. In addition, members of the GAT may be invited to contribute to the development of and feedback on policy documents. Final sign-off of policy documents lies with the Head of Policy, but a process of review is in place whereby the Director of Policy and Strategic Programme Support will provide input into the policy documents before final sign off.

Ensuring consistency during implementation

A new advocacy structure is currently being developed, based on the previous cross-departmental Global Advocacy Team. This will see an International Advocacy Steering Group agree the organisational advocacy foci for Sightsavers, to then be enacted through the International Advocacy Coordination Team, which will work via working groups set up around each theme, comprising the relevant staff. The Global Advocacy Coordinator will support this process, and report into the Director of Policy and Strategic Programme Support.

The Global Advocacy Coordinator and other international advocacy and policy staff also feed into advocacy plans at the country team level, through the annual planning and reporting process, to ensure some consistency of focus and messages, while recognising the different issues that are relevant at the country level. This process works for the UK as much as it does for any of the country programme offices in Africa and Asia.

Fair and accurate public criticisms

Sightsavers is committed to ensuring that any criticism made of an advocacy target is fair and accurate. It is for this reason that policy materials are based on robust evidence that can stand up to scrutiny. The involvement of senior members of staff in the production of policy materials, including policy briefs, policy papers, policy reports, and policy blogs helps to ensure that we are fair and accurate in our criticisms. Sightsavers is also committed to constructive criticism where possible, providing options for improvement and change whilst pointing out the problems with the status quo.

Corrective adjustment of advocacy positions and campaigns

Sightsavers does not currently have a clear process for corrective adjustments of advocacy positions and campaigns. Corrective adjustment of advocacy positions is likely to involve a discussion between SMT, the GAT, the Policy Team and relevant Country, Area and Regional Directors to determine what corrections need to be made and to agree how corrective adjustments should be implemented. In 2012 it may be necessary to develop a clearer process for corrective adjustments of advocacy positions and campaigns, especially as the volume of policy and advocacy work and campaigning is expected to increase.

Corrective actions taken

In the last 12 months, corrective actions were required to clarify statistics that were being used in policy and advocacy materials. Specifically, corrective actions were taken in relation to costings figures being used for policy work on neglected tropical diseases (NTDs). This involved the Policy Team working with the Planning, Performance and Reporting Team to review and provide more accurate unit cost data on how much it costs to control NTDs. Corrective actions have also been taken with regard to statistics that have been used in our education and disability policy messaging. This involved the Policy Team working with our Communications Team to review statistics being used, verify the source of the data, agree the correct statistics and ensure the new, agreed, statistics are shared with all members of the organisation.

Publishing positions

All finalised advocacy positions are published internally on the Sightsavers' intranet systems. External publishing of the positions is conducted through our website, but also through dissemination of finalised policy documents to all key stakeholders, including bi-lateral donor agencies, multi-lateral agencies, NGOs, regional, country, and area offices.

Exiting a campaign

At the moment Sightsavers is not currently conducting a public awareness or advocacy campaign. As such no clear exit strategy for when campaigns are ended exists. However, in 2012 a policy campaign will be developed and as part of this a clear exit strategy from the campaign will be designed.

Formulating, communicating and implementing advocacy positions and campaigns

The process for formulating advocacy positions is as above. For policy campaigns, formulation of the campaign also includes the involvement of the Supporter Engagement and Communications Teams. Communication of advocacy positions is through internal dissemination of positions to all members of staff and sharing of positions through the GAT. Externally, advocacy positions are communicated through the distribution of policy materials produced, dissemination of policy positions through key networks, and sharing of positions with key advocacy partners and targets in face-to-face meetings. Implementation of advocacy positions is through the work of the Policy Team and the GAT.

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

Planning programmes

Each country office produces a Country Strategy Paper (CSP) which details what needs to be done in that country to contribute to the national development challenges and achieve the organisational change themes, taking into consideration the particular circumstances and situation in each country. The CSP provides a summary of the development context, including trends and background information on eye health, education provision for children with disabilities, and social inclusion for people with disabilities, as well as details of work undertaken and development priorities of national and local government organisations and ministries, international and national level NGOs, and bilateral and multi-lateral development agencies.

The CSP also provides details of Sightsavers' existing and proposed implementing and strategic partners. The choice of these partners is based on an analytical assessment of existing services in the public, private and third sector, as well as detailed situational analyses of priorities for development. Where they exist, Sightsavers is in general a member of relevant national coordinating mechanisms, advocacy alliances and policy making fora.

Sightsavers project documents, including the initial design of a proposed project in a concept note, require country office staff to provide details of other organisations working on the same or similar issues within the project area, along with details of stakeholder mapping, rationale for selecting project partners, envisaged relationships with other actors and any potential for consortium approaches.

Sightsavers works with approximately 300 partners in over 30 countries and the Programme Partnership Policy formalises the importance of programme partnerships and recognises that Sightsavers and its partners can achieve more working together than separately. However, the heart of the policy centres on developing an understanding of how Sightsavers works with partners and making explicit Sightsavers' aim of partners achieving sustainability and independence.

Learning from the work of other actors

From 2011 new programme proposals were reviewed by an internal panel of development and technical advisors, as well as external review where appropriate. This review drew on the advisors experience of the work of other actors within the sector. To be approved by the panel for implementation, projects must have a clear plan for replicating and scaling-up the successes documented during implementation. New

approaches must be married with a rigorous design approach that allows for innovation to be appropriately evaluated, documented and lessons learned to guide future Sightsavers programming and contribute to global learning. In order to achieve lasting results, it is necessary to establish robust partnerships with a range of development actors including local communities, businesses, the private sector, institutions, universities, governments and NGOs, and to pursue complementary programmes and collaborative approaches to achieve lasting change.

Programme Development Advisors (PDAs) for each of the main thematic areas of Sightsavers' work – eye health, education and social inclusion - are responsible for the provision of technical leadership, including the dissemination of good/best practice resources for Sightsavers and the wider development community. PDAs also have a significant external facing role in representing Sightsavers in key international networks and decision-making fora. They also contribute to the organisation's research agenda through close collaboration with the Head of Research and country offices. This role is also played by the Policy and Strategic Programme Support (PS2) department with technical specialists in policy, research, government relations, monitoring, quality and impact. A key role of the PS2 department is to bring external thinking and good practice into Sightsavers.

Partnerships with other organisations

Increasingly, Sightsavers is looking to develop collaborative approaches to programme implementations with other development organisations: Sightsavers is a founding member of the International Agency for the Prevention of Blindness (IAPB), a coordinating umbrella organisation leading international efforts in blindness prevention activities. IAPB promotes the global initiative "Vision 2020 The Right to Sight". Today IAPB brings together more than 80 international NGOs, training institutes, universities, foundations and private companies, working across the world to support development of eye health services.

Several long-standing and effective international partnerships between governments, NGOs, the private sector and communities have played key roles in reducing avoidable visual impairment. In particular the African Programme for Onchocerciasis Control (APOC), the Alliance for the Global Initiative of blinding Trachoma by 2020, and Vision 2020 have substantially strengthened action by international and national stakeholders. These partnerships have also enabled long-term resource mobilisation from the private sector through drug donation programmes – notably the Merck donation of Mectizan® to control onchocerciasis, and the distribution of azithromycin to control trachoma, under a drug donation programme by Pfizer.

Sightsavers is in official relations with the World Health Organisation, and has a partnership with WHO AFRO (which includes funding for a range of research programmes and work on development of eye health indicators). Recently the organisation has also developed a closer relationship with the World Bank involving research on provision of spectacles for children.

Recent international development trends require Sightsavers to move towards the consortium approach to resource mobilisation, including:

- The move towards enhanced coordination of INGOs, as witnessed by the expansion of sectoral approaches to minimise duplication and optimise resources;

- The growing expectation by funding partners that INGOs must synergise their efforts to reduce transaction costs;
- The view that governments themselves are increasingly unhappy with multiple, uncoordinated INGO activities in their countries.

Most recently Sightsavers was instrumental in bringing together a UK Coalition Against Neglected Tropical Diseases, which includes organisations based in the UK working on NTDs – both INGOs and academic institutions such as Imperial College and the London School of Hygiene and Tropical Medicine. Sightsavers is also involved in NGO consortia including the International Disability and Development Consortium (IDDC) and Bond. IDDC acts as a vehicle for its member organisations to express their shared beliefs and principles and shape these into a strong voice in the disability and development field. Bond is the UK membership body for NGOs working in international development, which promotes, supports, represents and, on occasion, leads the work and interests of UK international development organisations.

These three ‘drivers’, coming from INGOs, donors and governments respectively will increasingly make the consortium approach the norm rather than the exception. Sightsavers has recently started a continent-wide initiative to strengthen human resources for eye health in Africa, involving a planned consortium of international NGOs, African governments and international funding partners running for 10 years (2011 – 2020), and pooling resources to strengthen existing training institutions and establish new ones

Future plans

The expansion of Sightsavers collaboration with broader development agencies at the global level is a priority. This collaboration already happens with development organisations at country level and Sightsavers has recently developed strategic partnerships with two of the largest INGOs working in the areas of health and disability. Sightsavers is also actively exploring development of strategic partnerships with organisations working in the area of water and sanitation. Good eye health depends on more than health care services. This is particularly evident in trachoma work, where environmental hygiene and face washing form critical components of the SAFE strategy. Collaboration between the health and water and sanitation sectors is essential for eliminating trachoma.

Sightsavers has recently undertaken a mid-term review of the 2009 – 2013 Strategic Plan, which includes a review of alliances, strategic partnerships and the private sector. The review concluded that the plan should be extended to 2018, given the level of its ambition.

Outputs from the review include:

- External review of ‘sister’ agencies
- Internal analysis and recommendations on sister agency collaboration
- Internal review of current collaborations with wider NGOs
- External review of the perception of Sightsavers among key INGOs
- An analysis of the above, leading to recommendations on wider NGO collaboration
- External review of trends in private sector health provision
- Recommendations paper on collaboration possibilities with the private sector

Economic

NGO7 Resource allocation

Sightsavers financial management and control framework is multifaceted 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. This framework underpins Sightsavers' progress towards achieving its strategic objective of using resources strategically and efficiently and is geared towards SORP compliance.

Financial management procedures are built around two key information systems: the Global Accounting System (GAS) and the Financial Management Framework (FMF). GAS is a SUN accounting system. The FMF is a web-based database system that supports all aspects of planning and forecasting and contains detailed fund management and resource allocation information. Both systems are globally accessible for data entry and extraction.

Planning, budgeting and resource allocation is based on Sightsavers' organisational strategy. This strategy guides country programmes' long term strategy plans, with rolling five year programme portfolios detailing how these plans will be achieved. New programme activity to strengthen and increase the impact of these plans must be approved by a commitments management process designed to improve quality, strategic alignment and cost effectiveness.

On an annual basis, Sightsavers produces a five year budget to implement the programme plans. The process is activity based and is undertaken at a cost centre level, informed by discussions with partners. Fundraising and support functions develop plans that will enable the organisation to implement the programme plans as effectively as possible. The budgets are challenged and approved through the line management process. Data on these plans is provided to the Strategic Management Team (SMT) and overall resource allocation decisions are taken with full understanding of long term projections of organisational reserve levels. SMT has the ultimate approval of the plans and budgets.

Resource allocation information is contained within the FMF system once finalized and, as funding is received for specific purposes, this detail is also added to the system. Expenditure recorded in GAS is uploaded onto the FMF allowing direct comparison between the resources allocated and the expenditure incurred. This process provides assurance that the funding is being used for the correct purpose. This data is also used as the basis for the production of our year end fund balance position for inclusion in the statutory Annual Report and Accounts. A mandatory external audit is carried out of these accounts that provides assurance over the accuracy of this position.

Sightsavers has implemented a strong financial control framework, around the accounting for financial transactions in GAS and the FMF, which is documented in the Financial Framework. This document can be found on our website (http://www.sightsavers.org/in_depth/quality_and_learning/organisational_monitoring/14042.html). Integral to this framework are strong transactional controls over income and expenditure and monitoring controls, such as balance sheet reconciliations. One of the key controls over expenditure is the need to review it for compliance with terms and conditions set out by donors.

NGO8 Sources of funding by category and five largest donors and monetary value of their contribution

Sightsavers has a strategic objective of growing and diversifying income. This is driven by a desire to increase the impact of the organization, to insulate it from the effects of troubled economic times and by an evidence-based belief that ability to influence key international development decision-makers and influencers is improved by having direct programmatic and funding relationships with them. As a result, whilst income from individuals, trusts and corporates has broadly held steady since 2008, income from institutional donors (particularly bilaterals and multilaterals) has risen by 252 per cent to £8.7m in 2011. It is hoped that this trend will continue in the coming years.

Another income trend over the same period is the significant increase in gifts-in-kind income. In 2008, £69.4m worth of gift-in-kind income was reported in the statutory accounts, whilst in 2011 this figure had risen to £122.2m. This balance is primarily a donation of Mectizan® tablets from Merck and Co. Inc to treat onchocerciasis and lymphatic filariasis (LF). The increase in the accounts represents a doubling in the number of treatment cycles in some countries and an increase in focus on the treatment of LF. The decrease from the high in 2010 primarily reflects levels of stock held at the beginning of the year. However, the explanation above still holds and levels of gifts-in-kind are expected to remain above, rather than below, £100m.

From the 2011 Annual Report and Accounts, the categories of income are as follows (along with comparative figures for 2010):

Category	2011 £'000	2010 £'000
Gifts-in-kind	122,166	140,679
Individuals	17,499	17,713
"Institutional" donors	8,658	3,663
Legacies	8,245	7,318
Companies	2,619	2,178
Trusts	1,440	1,084
Community service and other organisations	379	385
Investment income	171	188
Other	151	263

The five largest donors and the value of their contribution are as follows:

Donor	2011 £'000	2010 £'000
Merck and Co. Inc	121,791	140,371
Department for International Development	2,903	120
European Commission	2,672	2,164
Comic Relief	1,123	0
Standard Chartered Bank	1,121	969

EC7 Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation

Sightsavers' Global Recruitment Policy states that the practice is to recruit people currently resident in a country where we can, both in terms of cost effectiveness and commitment to build capacity in local communities. Locally hired employees are offered contracts in line with national terms and conditions.

The proportion of senior management hired from the local community at locations of significant operation is reported below. Senior Managers include the Strategic Management Team, Regional, Country, and Area Directors, and functional Heads.

Region	Senior Managers	Hired locally	Proportion
East, Central and Southern Africa	7	7	100%
India	7	7	100%
West Africa	12	11	92%
South Asia	3	3	100%
Europe	25	24	96%

Environmental

EN16 Total direct and indirect greenhouse gas emissions by weight

Sightsavers' largest office is located at Grosvenor Hall, Haywards Heath, West Sussex in the United Kingdom. The figures in the table below relate to that location only.

Electricity and Gas used at Grosvenor Hall		
January – December 2011		
Type	Consumption (kWh)	CO2 (tonnes)
Gas	37,841	6.124
Electricity	347,915	192.724
Total	385,756	198.848

Systems do not exist to collate data from overseas offices in respect of indirect greenhouse emissions for buying gas, electricity or steam. This is unlikely to change until energy companies in these countries have the facility to calculate the carbon emissions resulting from energy generation.

Business Travel

Approximately half of Sightsavers business related air travel globally by value* is booked via a central process using a travel management company (TMC) from which CO2 figures can be obtained. The remainder is booked by local offices directly in country and no process exists to gather CO2 data in respect of these flights. The total of this local spend is reflected in the table below and can be considered as a proxy for CO2 emissions.

Air travel spend	Jan - Dec 2011 (£'s)	Jan - Dec 2011 (%)
Travel Management Company	227,342	40.60%
Skywards tax	35,484	6.34%
Short haul (Europe) via Easyjet etc	12,887	2.30%
	275,713	
Air travel booked through local offices outside Europe	284,260	50.76%
Total	559,973	

*Of the business related air travel which is booked via the central process the majority 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 34,852,302 Skywards miles (2010: 30,725,000) for the purpose of 452 related flights (2010: 331), which were donated by Emirates. In our annual report and accounts we give these a value of £229,000 (2010: £224,000) based on the lowest economy fare available at the time of travel.

CO2 (Tonnes) Air Travel Report Jan 2011 – Dec 2011	
Journey Type	CO2 (tonnes)
Short haul (Europe) - TMC	3.58
Short haul (other continents i.e. Africa to Africa) - TMC	13.79
Long haul - TMC	370.72
<i>Total - TMC</i>	<i>388.09</i>
Long haul – Skywards – donated flights via "air miles"	544.59
Short haul (Europe) i.e. Easyjet, Aer Lingus	14.14
TOTAL	946.82

A good deal of surface business travel is undertaken in countries where Sightsavers has country offices using Sightsavers owned and operated vehicles, some of which are ageing and equipped with engines which are not as efficient as more modern units. No current system exists for recording the CO2 output of this fleet but in comparison with air travel, it is not believed that the numbers involved would 'shift-the-needle'

EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved

Grosvenor Hall - Premises

Sightsavers is actively seeking to sell the existing UK headquarters building, a converted Edwardian convent school, to seek more energy efficient office premises elsewhere in the town.

In addition, by the end of Q1 2012 Sightsavers will have transferred to a green energy tariff from an appropriate electricity supplier, which will further reduce the greenhouse gas emissions.

Grosvenor Hall - IT Infrastructure

The electricity consumption at Grosvenor Hall is significant. The major driver for this is the presence on site of two IT server/comms rooms with 3 phase power and air conditioning running 24 x 7. A project began in 2011 to virtualize the majority of the server farm and relocate it off site in a hosted environment. This project will be completed during 2012 regardless of any office re-location project. This will clearly

reduce energy consumption from Sightsavers' premises but is also anticipated to reduce total energy consumption from Sightsavers' IT infrastructure through economies of scale.

Multi-functional printer/copiers were installed in 2011, reducing the total number of devices maintained at Grosvenor Hall.

Grosvenor Hall – Vehicles

The lease contract on the corporate 'pool' car has been terminated and staff are encouraged to use public transport or car sharing for all surface business travel within the UK.

Overseas – Vehicles

In late 2011, Sightsavers began a programme to replace all office vehicles in countries where it has country offices with modern, fuel efficient, low-emission, lower CO2 Ford vehicles. This programme will run throughout 2012 and into 2013 at the close of which all old vehicles should have been replaced.

Virtual Meetings

In 2011 Sightsavers made an investment in video-conferencing equipment to enable a geographically diverse Strategic Management Team to hold virtual meetings. In 2012 Sightsavers will introduce desktop videoconferencing facilities and make them available to all staff in all offices globally. Significant effort will be put into educating staff in 2012 in the advantages and use of tele-, web- and video-conferencing.

Labour

LA1 Total workforce, including volunteers, by type, contract, and region

The total employed workforce is reported in the table below by type, contract and region:

	Sightsavers	Europe	West Africa	East, Central and Southern Africa	India	South Asia
Total	383	143	98	53	50	39
Of which:						
Full time	356	116	98	53	50	39
Part time	27	27	0	0	0	0
Permanent	216	131	31	49	2	3
Fixed Term	167	12	67	4	48	36

In addition to this employed workforce, Sightsavers has 143 volunteers in total that are all classified as 'occasionally mobilized'. Their main functions are:

- Talks to community groups including schools, churches and service organizations;
- Classroom activities with school children; and
- Events/conference cover.

Of these volunteers, 10 have been trained in 2011 as regional coordinators. These volunteers provide support to the other volunteers within their region, but this does not constitute a part time role.

Sightsavers also works with university students who carry out street collections on its behalf. The precise number of students undertaking these collections varies from year to year, but averages 40 students per year. This is very sporadic and these volunteers do not receive any specific training for the role.

LA10 Average hours of training per year per employee by employee category

Sightsavers is committed to investment in training and development across all areas of its operations. The organisational approach aims to recognise the different development stages of its staff through identification of needs at an individual level. Individual needs are identified through the annual Performance and Development Review that each staff member goes through with their line manager.

In 2010 Sightsavers embarked on a high level, global initiative – Developing Country Level Teams (DCLT) – aimed at building in-country capacity focused primarily on leadership development and programme development and management. DCLT resulted from a strategic organisational review which identified a need to invest significantly in development of the country office teams. These country development needs were across all roles within country teams, although there has been a globally coordinated development programme focussing on the areas of leadership and management as well as on programme management. Both of which were identified as strategic imperatives for the organisation and are reflected in the appropriate Strategy Implementation and Monitoring cards.

The training data reported here reflects the internal reporting systems through the HR database and the figures supplied to the Strategic Management Team on a twice-yearly basis. Each employee is categorized by region/directorate and this split has been used in reporting the data below. The higher levels of training hours for employees outside of Europe reflects the global DCLT programme

	Europe*	West Africa	East, Central and Southern Africa	India	South Asia
Average hours training per employee	6.9	60.7	41.8	67.6	48.3
*Category breakdown					
UK Executive Directorate	1.9				
UK Funding & Marketing	8.6				
UK Policy & Strategic Support	11.1				
UK Finance, Planning & Operations	9.7				
UK International Programme Operations	0				
Europe - Italy & Ireland	0				

Of the 143 volunteers identified in LA1, all received four hours of training in their responsibilities at the beginning of the year.

Sightsavers also trained 10 regional volunteer coordinators from the group of 143, giving each a full day of training to allow them to fulfil their additional responsibilities.

LA12 Percentage of employees receiving regular performance and career development reviews

The data below is a report on the percentage of employees receiving a Sightsavers' Performance and Development Review (PDR) in 2011 for the 2010 review year, which includes both performance assessment and personal development plans. Feedback received through the Employee Survey 2011 indicated that staff felt that the current PDR process needs to be simpler with more emphasis on continual performance management throughout the year rather than a more formal annual approach. The forms and guidelines have been redesigned and this was rolled out in November for this current review year (2011).

	Sightsavers	Europe	West Africa	East, Central and Southern Africa	India	South Asia
% Completed	100%	100%	100%	100%	100%	100%

LA13 Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity

The composition of governance bodies and the breakdown of employees per category is presented in the table below. The same employee categories have been used for this indicator as for LA10 above, reflecting the classifications in Sightsavers' HR system.

Governance Bodies

The split between the different governance bodies of Sightsavers is outlined in section 4.1 of this report.

	Strategic Management Team	Trustees
Total	7	17
Gender:		
Male	4	13
Female	3	4
Ethnicity:		
White	6	12
Black	1	2
Asian	0	3
Age:		
Under 30	0	0
30 - 50 years	5	5
Over 50	2	12

Disability	0	2
-------------------	---	---

	Sightsavers	Europe	West Africa	East, Central and Southern Africa	India	South Asia
Total	383	143	98	53	50	39
Gender:						
Male	169	42	31	36	34	26
Female	214	101	67	17	16	13
Ethnicity:						
White		133				
Black		3				
Asian		7				
Age:						
Under 30	42	26	4	3	5	4
30 - 50 years	287	92	81	47	36	31
Over 50	54	25	13	3	9	4
Disability	13	6	2	0	3	2

Although Sightsavers collects data on ethnic origin in Europe there is not presently a mechanism for collection of this data across the other regional areas of operation. This is something that will be developed in the future.

Part of Sightsavers' mission is to promote equality of opportunity for disabled people. In the UK, Sightsavers has been accredited with the 'Two Ticks' Disability symbol. A guaranteed interview scheme is operated for all job applicants with a disability who meet the minimum criteria for a vacancy and the HR team work closely with line managers to offer reasonable workplace adjustments to those who require them. The organisation has recently embarked on a 2-year objective to increase recruitment of people living with a disability (with an emphasis on visual impairment) both in the UK and overseas and Sightsavers will be working to increase disability awareness and confidence across all areas of our operations.

Society

SO1 Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting

Prior to the development of the current strategy, Sightsavers generally supported partners and projects over many years without having explicit plans for exit and sustainability. The new strategy, based on the development of approaches for demonstration and then scale up by duty bearers such as ministries of health and education, has an explicit ambition of addressing systemic challenges and engaging with public, private and civil society partners and stakeholders from the outset to agree approaches to sustainability and scale-up. An integral part of this is developing a roadmap for exit and post-exit support where appropriate.

Sightsavers currently employs a number of processes to assess and manage the impact of our supported programmes on communities. These include:

Situational analyses

Prior to the development of a project or programme, programme teams are expected to conduct a situational analysis. The analysis is essential to provide Sightsavers and its partners in both the public and civil society sectors, the necessary information to develop programmes that: respond to local need; address root causes and systemic barriers; collaborate with other community and development actors; and plans for sustainable change that is not solely dependent on Sightsavers support.

Commitments' Management Process

All new programmes have to pass through a commitments' management process. A key consideration in deciding whether to fund a new programme is the extent to which the design and planning of the programme has: included the targeted beneficiaries of the programmes; the proposed implementing partners and other stakeholders; and articulates a clear approach to addressing sustainability and exit.

For those existing programmes that did not receive approval through the Commitments' Management Process there is a requirement to produce an exit strategy to implement. Funding is available to manage this transition.

M&E

As part of Sightsavers approach to M&E, programmes are also expected to have included in their proposals an approach to on-going participatory learning from routine monitoring, as well as mid-term reviews and evaluations that address issues of impact at multiple levels. This includes approaches to assessing the positive, as well as the unforeseen, impacts of programmes that Sightsavers supports. Where limitations are noted in the commitments' management process, follow-up support and guidance is provided and the issues identified have to be addressed before the programme is approved.

Monitoring data is collected by partners, who work directly with beneficiaries. They collect data on output measures at the point of service delivery eg when a patient comes in for surgery or when a child is admitted into school. The monitoring system gathers this data from partners on a regular basis, either monthly or quarterly through partner reports. With evaluations, Sightsavers works with consultants to ensure independence of the work. The minimum expectation is for these consultants to gather information directly from community members either through methods for groups such as brainstorming, focus group discussions, ranking etc or methods for individuals such as key informant interviews, structured or semi-structured interviews.

For monitoring, service data is collected from all those who use the service as part of national data collection efforts, while selection for evaluation purposes is influenced by the evaluation design. For the latter, the evaluators use methods ranging from random selection to purposive sampling especially when it comes to dealing with key informants. Sightsavers is independent of selection processes in evaluations so as to avoid bias.

It would be fair to say that the strength of Sightsavers work in M&E is not consistent and the organisation is increasing its capacity in M&E, as well as research, to better be able

to support country level programme staff develop and undertake this work. Sightsavers is currently in the process of rolling out the Sightsavers Adaptive Monitoring System (SAME), which is a systematic process that guides programme staff through a series of analytical questions to help them develop an appropriate M&E system relevant to that programme's ambition.

Learning from past experience

Sightsavers approach to sustainability and exit is informed by past experience and learning. The aim is to recognise the challenges and make adjustments where necessary. For instance, a recent evaluation of a major eye health programme supported by Sightsavers over many years revealed that the exit strategy adopted had not achieved the necessary buy in from the government ministry to ensure sustainability. As an exit at the proposed date would have left services neglected and potentially years of development gains lost, a decision was made to work with the ministry to develop a new exit strategy approach based on past learning which meant extending the programme period. The learning from this has directly informed work on developing exit strategies. For instance, the approach a programme uses to manage exit needs to be actively reviewed and analysed with the implementing partners and programme beneficiaries on a regular basis and should not wait for an end of programme evaluation.

SO3 Percentage of employees trained in organisation's anti-corruption policies and procedures

Sightsavers does not have a stand alone training programme for employees on the anti-corruption policies and procedures that have been adopted. Instead, the practice followed is to introduce all employees joining Sightsavers to the policies as part of their induction process. Changes in policies and procedures are communicated to staff as they occur and an annual reminder about the fraud reporting, money laundering and whistle blowing policies is issued.

In 2011, the biggest change to the anti-corruption framework was the introduction of the Bribery Act in the UK and the requirement for organisations to put in place adequate procedures to prevent persons associated with the organisation from bribing another person on their behalf. This change has been communicated to all staff by the Chief Executive, along with the impact on policies and procedures. During the risk assessment of the organisation it was identified that there were risks of bribery by persons associated with Sightsavers' programme offices. As part of the mitigation strategy for this, all Country Directors were provided with more information on the Act and the organisation's strategy for addressing it as part of the wider Developing Country Level Teams programme.

Sightsavers has a strong control framework to prevent and detect fraud, supported by internal and external audit visits that provide a deterrent effect. Sightsavers has a whistle blowing policy to encourage staff to report any instances of corruption that do occur.

Product Responsibility

PR6 Programs for adherence to laws, standards, and voluntary codes related to ethical fundraising and marketing communications, including advertising, promotion, and sponsorship

Sightsavers core fundraising markets are the UK and Ireland. In both locations, Sightsavers is a member of the relevant fundraising bodies and also endeavours to comply with rules on standards in advertising.

In the UK, Sightsavers is a member of the Direct Marketing Association (DMA), the single trade body for all reasonably-sized Direct Marketers, and the accepted trade body as to 'best practice' on all elements of Direct Marketing. It is also a member of the Fundraising Standards Board (FRSB). Sightsavers is subject to the Advertising Standards Authority, which is the lead authority in the UK on any complaints or breaches of standards in all advertising. Compliance with the rules of the DMA is assessed through an external audit by the DMA, the last of which took place in summer 2010. Sightsavers self assesses compliance with the rules of the FRSB through submission of an annual report to them.

For fundraising activities in the Middle East and India, no local bodies providing guidelines and standards have been identified and so standards established in the UK, as outlined above, are followed.

Sightsavers Ireland is a member of Fundraising Ireland - an Irish professional body that seeks to represent the concerns of professional fundraisers across the country. Its purpose is to promote the highest standards of fundraising, and to support and develop the knowledge and standards of all those who are engaged in fundraising activities. As a member Sightsavers is required to abide by a strict Code of Conduct. It is also subject to the ASAI's (Advertising Standards Authority for Ireland) Code of Standards for Advertising, Promotional and Direct Marketing who are the lead authority in Ireland on any complaints or breaches of standards in all advertising (for example, inappropriate imagery and/or inaccurate claims). Finally, Sightsavers Ireland is now compliant with the Guiding Principles for Fundraising as set out by the Irish Charity Tax Reform.

In the United States, Sightsavers is a member of the Association of Fundraising Professionals, which sets out principles of ethical fundraising. It is also registered with Guidestar, whose standards include a Donor Bill of Rights. Sightsavers assesses compliance with these standards annually. Sightsavers Italia operates within the fundraising guidelines issued by the Agenzia per il Terzo Settore.

Sightsavers is also required to be compliant with the requirements of the Data Protection Act 1998 and the Electronic Communications Directive 2003, as regards supporters. This is recognized through employee contracts and regular staff training on the implications of this legislation. All external suppliers (e.g. mailing houses) must also sign data security statements.

All UK supporter complaints, including those related to breaches of standards for fundraising and marketing communication practices, are recorded on the supporter database. This is regularly reviewed by the relevant line manager in order to determine the next steps in managing the complaint. Sightsavers encourages any supporters that

are unsatisfied with the way that their complaints have been dealt with to contact the FRSB for a review of the complaint and how it was handled.

At the end of the year, Sightsavers must submit a report to the FRSB and showing the number of complaints received, broken down by activity. For 2011, the reported figures are as follows:

Type of fundraising	Volume	Complaints
Telephone fundraising	15,056	8
- Tone of call		0
- Frequency of communication		0
- Timing of communication		0
- Data Protection (TPS registered etc)		0
Addressed pieces of direct mail	715,148	68
- Tone and language of the appeal		6
- Images / photographs contained in the appeal		0
- Accuracy of the appeal		38
- Use of enclosures		2
- Poorly addressed communication (i.e. misspelled names)		0
- Communication to a deceased individual		0
- Frequency of communication		6
- Campaign fulfillment (no thank you letter etc)		16
- Data Protection (MPS registered etc)		0
Email fundraising	331,761	0
SMS fundraising	0	0
Online Advertising	0	0
Outdoor advertising	3,800	0
Television adverts	18,750,000	0
Press advertising	38	0
Magazine / Newspaper inserts	4,670,000	0
Volunteer fundraising	184	3
Fundraising from business	1,618	0
Trusts and foundations	1,740	0
Major donor fundraising	24,750	0

No complaints were received regarding data protection issues.

In the new fundraising locations, Sightsavers received a small number of requests to remove individual's details from our distribution lists, but otherwise only one significant complaint, relating to the failure to secure all of the required permissions to carry out a telemarketing campaign in each of the Emirates in the UAE.

Appendix 1: Link to Charter Principles

Principle	Referred to in report
Respect for Universal Principles	<p>Sightsavers works to provide blind and disabled peoples organisations with the skills to advocate for adoption of the UN Convention on the Rights of Persons with Disabilities. This is described in Indicator NGO1.</p> <p>More generally, this principle underpins all of the work described in the report.</p>
Independence	Section 2 sets out the ownership and structure of Sightsavers. Section 4.15 shows how Sightsavers chooses who to engage with. Indicator NGO8 describes Sightsavers sources of funding.
Responsible Advocacy	Indicator NGO5 addresses Sightsavers approach to responsible advocacy.
Effective Programmes	Indicators NGO1-4 and 6 describe how Sightsavers works in partnership to achieve its aims.
Non-discrimination	Indicator LA13 describes the internal approach. Indicator NGO4 describes the external approach.
Transparency	The whole report is a demonstration of Sightsavers engagement with this principle. Indicator NGO7 refers specifically to the audited accounts.
Good governance	Section 4 – Governance, commitments and engagement governance.
Ethical fundraising	Indicator PR6.
Professional management	<p>Indicator NGO7 refers to Sightsavers financial controls.</p> <p>Section 4 sets out the accountability arrangements for the Board. Indicator NGO3 describes the evaluation of projects. Indicator LA12 describes employee evaluations.</p> <p>Indicator NGO5 addresses the approach to responsible advocacy.</p> <p>Indicator NGO6 highlights how Sightsavers coordinates with other actors (including partners) Section 4.15 shows how appropriate partners are identified.</p> <p>Indicator LA10 refers to human resource development.</p> <p>Indicator NGO4 describes Sightsavers approach to gender in programming.</p> <p>Indicator SO3 describes Sightsavers approach to bribery and corruption and whistleblowing.</p>