

INGO Accountability Charter Annual Report 2013

Completed by:

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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 the 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. Strategic Commitment to Accountability

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

This is Sightsavers' third INGO Accountability Charter report. We were very pleased that the Independent Review Panel feedback was positive again last year, remarking on our commitment to Charter Principles; the link between our strategy; implementation and monitoring, and our dashboard.

There were a couple of points made – notably concern over our lack of a comprehensive Complaints Handling Mechanism (we had these for staff and donors but nothing beyond that). There was also recognition that our report was rather too long!

In 2013 we have addressed the primary point, introducing a revised Complaints Handling Policy supplemented by Complaints Handling Procedures. These have been rolled out to the organisation as a whole. We will make sure this report does not exceed 40 pages, and in the spirit of this, I have shortened this statement from three and a half pages to two and a half!

Our strategic framework has not changed since last year and can be found on our [website](#). It is articulated in the previous two reports and hence is not set out again here.

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, indicators and targets for each objective. We have an interactive dashboard which captures these measures and is a key tool used by the senior team for monitoring performance against strategy. The dashboard is on our [website](#) to ensure transparency and enable the public to hold us to account. Our [Annual Report and Accounts](#) also includes all the outputs for the year together with an explanation of performance against specific objectives. We are open about areas where there were challenges or disappointments.

As part of our increasing awareness of the need for accountability, we have introduced some new management reporting over the last year, specifically covering large restricted grants. These are regular reports which show performance against agreed targets and budgets, which are reviewed both by senior management and by our audit committee.

We intend to review the SIM card later in 2014 to ensure that it remains current, not least as we have been doing a lot of work on our Theory of Change, and upgrading our thematic strategies. These will impact on our SIM card measures and in some cases (notably in social inclusion) on our objectives.

Our website (www.sightsavers.org) includes a range of publications related to transparency - our Financial Framework, a Sustainability Statement and our governance arrangements are all set out alongside our Annual Report and Accounts.

We consider the INGO Accountability Charter to be very important as an external benchmark – I am on the board of the Charter company and was recently appointed as Vice Chair. In addition to being signatories of the INGO Accountability Charter, we have committed to reporting under the International Aid Transparency Initiative (IATI).

Our top priorities for the next few years are:

- Ensure we deliver against our plans for the major neglected tropical diseases (NTD) contracts/grants, and ensure the commencement of new ones is done well. Over the last 18 months we have secured over £100 million worth of such grants from donors such as DFID and the Queen Elizabeth Diamond Jubilee Trust, so this is a key focus for us going forward.
- Develop a new Social Inclusion strategy and ensure as far as possible that our programmes are inclusive of people with disabilities (i.e. ensure we practice what we preach). We see this as an important strategic development to improve our accountability to our beneficiaries.
- Design and develop a global programme portfolio consistent with the new thematic strategies – this will include exiting from non-strategic programmes in a way that minimises the impact on partners and beneficiaries. It is essential that all our programmes are aligned with our strategy – this can of course be difficult, but resources deployed on non-strategic work detract from the impact against our mission, for which we are accountable to all our stakeholders.
- Review all country and regional offices management structure, staffing and costs – ensuring we have the right staffing levels and expertise to deliver the portfolio in a cost effective way. The increasing focus of donors on value for money is a key driver for this.
- Develop a revised global advocacy strategy including campaigning work. This will include two core international areas of promotion of the WHO Action Plan and the post-2015 framework, as well as a policy campaign calling for DFID to take a leading role in inclusive development.
- Improve our research, evidence gathering and management information systems, including resilience systems around security of personnel and data. These are all essential from an accountability perspective – to beneficiaries and donors in terms of ensuring good quality programmes and to staff and a wide range of stakeholders in terms of security of personnel and data.
- Implement a new global fundraising strategy, integrating our teams to achieve more synergies and investing more in the recruitment of regular individual supporters in key markets. There will be a particular focus on digital channels and a major fundraising appeal based on eye health across our key markets. Both Middle East and India will be given high priority. The new strategy will ensure we are as efficient as possible in our fundraising and make decisions based on return on investment rather than emotion.

- Deepen and broaden our relationship with institutional donors, ensuring we deliver for those we already have and diversify our portfolio.
- Ensure our move to our new UK offices (which are far more accessible for disabled people, much more environmentally friendly and will promote more collaborative working) goes smoothly.
- Increase focus on both external and internal communications (including crisis management) by appointing a Strategic Communications Director – a new post for us. In today's world where communication is such a critical part of accountability, we have decided that this is essential.

2013 has been a year of great achievement and great change for the organisation. We have seen record levels of outputs (over 100 million NTD treatments for example) and some really significant new grants. We have had some significant advocacy wins (notably around the post-2015 agenda). We have also undertaken some significant restructuring which continues into 2014. Accountability is an underpinning theme with all our work, in recognition of the fact that in today's world it is becoming more and more important for all stakeholders.

Dr Caroline Harper
CEO
Sightsavers

2. Organisational Profile

2.1 Name of the organisation

The organisation is known as Sightsavers.

2.2 Primary activities

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

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

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

2.3 Operational structure of the organisation

Sightsavers is an international non-governmental organisation headquartered in the UK. Sightsavers is governed by a Council of Trustees, who oversee operations whilst delegating day to day management to the Strategic Management Team (SMT). The SMT consists of the Chief Executive plus the heads of the six directorates of the organisation. These are Global Fundraising, Human Resources and Organisational Development, Finance and Performance, Policy and Programme Strategies, Strategic Communications (under recruitment) and Neglected Tropical Diseases. Management at the country level is split into four regions (including India) and below this, by country/area. Details of the countries in which we operate are contained within section 2.5 below.

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

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

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

2.4 Location of organisation's headquarters

Sightsavers' head office is located at Grosvenor Hall, Bolnore Road, Haywards Heath, West Sussex, RH16 4BX, United Kingdom. The contact telephone number is +44 (0)1444 446600.

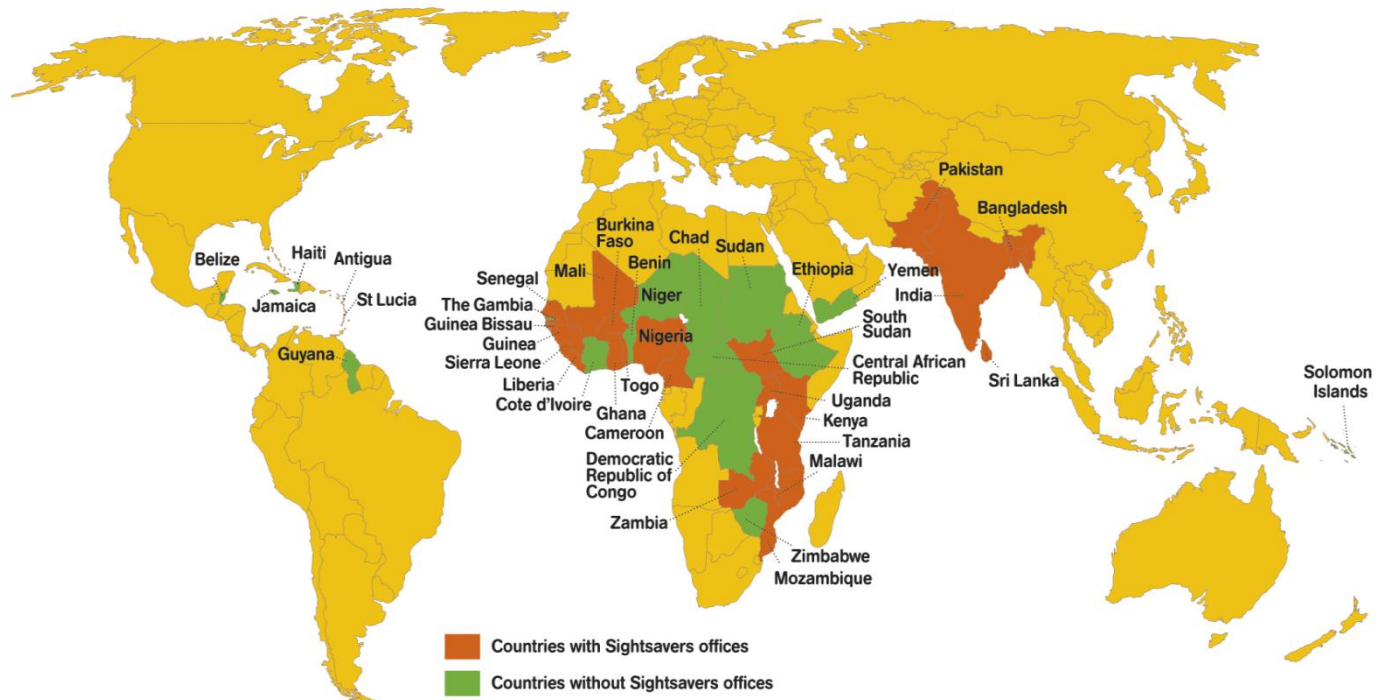
At the end of quarter one 2014, Sightsavers' head office is relocating to 35 Perrymount Road, Haywards Heath, West Sussex, RH16 3BW, United Kingdom. The telephone contact number remains the same.

2.5 Number of countries where the organisation operates

Sightsavers currently works in 39 countries in Africa, Asia and the Caribbean (see map below). There are regional offices based in Senegal (West Africa), Kenya (East, Central and Southern Africa) and India (for India as a region) with management oversight of the South Asia region (Bangladesh, Pakistan and Sri Lanka) based in the Bangladesh country office. There are country offices in 22 of the countries. Where we do not have an established country office, Sightsavers' staff are embedded with the partner, and in Benin, Zimbabwe, Chad, Central African Republic, the Democratic Republic of Congo, Ethiopia, Yemen and Sudan the relationship with partners is managed from other country offices.

Sightsavers also has funding and marketing activities based in Ireland, Italy, India, Sweden, the United States and the United Arab Emirates.

Countries where we have programmes



2.6 Nature of ownership and legal form

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

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

- Sightsavers owns the whole of the issued share capital of Sightsavers (Trading) Limited and the taxable profit is gift aided to Sightsavers.
- Sightsavers International Inc. is incorporated as a non-profit organisation in Delaware, USA. The organisation does not have any capital stock, but the incorporation documents and registration with the US Internal Revenue Service establish that it exists to support Sightsavers.
- Sightsavers International (Ireland), Sightsavers International (Italia) and Sightsavers Sweden are each limited companies registered as charities in their respective countries.
- Sightsavers India is registered as a charitable trust in India
- Sightsavers Italia is a registered non-profit association in Italy.
- Sightsavers Middle East is a marketing company registered in the Dubai Silicon Oasis Freezone.
- Sightsavers Sweden is a registered charity in Sweden.
- Sightsavers Zambia is a non-stock company wholly owned by Sightsavers and registered as an NGO in Zambia.

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

2.7 Target audience and affected stakeholders

Sightsavers' potential beneficiaries are people who are blind or have low vision, and those people at risk of becoming blind and disabled in developing countries. The precise geographic breakdown of this work is shown on the map in section 2.5, whilst section 2.2 outlines the primary activities undertaken to deliver for our beneficiaries.

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

During the reporting period, our stakeholder group has expanded to include private sector organisations supporting in the delivery of our interventions. Additionally, in 2013 we strengthened our consortium and alliance approaches with agencies, networks and institutions working in eye care.

2.8 Scale of the reporting organisation

As of 31 December 2013, Sightsavers had 389 employees and 96 volunteers. Our employees are based in each of the locations described in section 2.5 and undertake all functions to allow us to deliver our programmes. Our volunteers are UK based and contribute to fundraising and awareness raising activity in their local communities. In addition, we had 130,402 UK individual supporters who made one or more donations in 2013.

A detailed breakdown of Sightsavers' financial results for 2013 can be found in the Annual Report and Accounts, which is published on the website. In summary, total incoming resources were £199.7m (2012: £158.6m), of which £152.6m (£119.8m) was gifts in kind (primarily the donation of Mectizan ® from Merck and Co. Inc.). Total resources expended were £200.4m (£159.3m), split between costs of generating funds £10.1m (£9.7m), charitable activities £189.4m (£148.9m) and governance costs £0.8m (£0.7m). Sightsavers' net assets at 31 December 2012 were £9.8m. This is the net of £17.4m assets and £7.6m liabilities.

In 2013, Sightsavers operated over 300 projects. These supported many millions of beneficiaries (13,872,336 people examined, 34,302,111 people treated for onchocerciasis etc.) and full details of our output statistics can be found in the annual report and accounts. This is the first year that we have distributed over 100 million NTD treatments in one year. In 2013, we distributed 103,560,852 treatments.

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

2013 was a year of growth for Sightsavers, particularly in the Neglected Tropical Disease programme. This led to the expansion of the department created in 2012 and mentioned in the 2012 report, with a particular focus on technical and programme management expertise.

Two departures from the Strategic Management Team also led to a wider re-design of the Departmental structure. The two fundraising departments – UK and International, were merged to form one Global Fundraising Department, and the

Programme Operations Department was disbanded, with the functions distributed between a new Finance and Performance Department and the existing Policy and Programme Strategies Department. This allows a clear separation of responsibilities between a) the setting of programme strategy and global portfolio and b) the implementation of programmes and projects.

A new strategy was also agreed for Sightsavers India, with the independent Indian board. This will include a refocusing within poorer states in India and streamlining the number of programmes.

Finally, due to the global trachoma mapping project, we incurred significant programme expenditure in several countries where we are working exclusively through other international agencies, particularly Ethiopia. The set-up of the NTD Department has facilitated this operating model, one which will continue to expand with further significant NTD contracts in the pipeline.

2.10 Awards received in the reporting period

Sightsavers has not received any awards in the reporting period.

3. Report Parameters

3.1 Reporting period for information provided

The reporting period is the calendar year 2013

3.2 Date of most recent previous report

The most recent report was produced for the calendar year 2012

3.3 Reporting cycle

Sightsavers produces a report annually on a calendar year basis.

3.4 Contact person for questions regarding the report or its contents

Questions regarding the report or its contents should be directed to Alicia Cummins; Policy and Programme Strategies Coordinator at the head office address.

3.5 Process for defining report content and using reporting process

The process for defining the content of the 2013 report was undertaken in the same way as reported in 2012; with an audit of the outcomes from the 2011 detailed review of the level C reporting framework. We made the decision to maintain the same report content for comparability across the three year reporting period. In addition, we have increased the scope of the report to include the additional indicators in conjunction with the updated level C framework.

The report has been compiled with contributions from various functions within the organisation including Finance, HR, Global Fundraising, Planning and Performance, Research and Evidence, Programme Systems, Policy and Advocacy and the NTD teams. The process for monitoring progress against commitments made in the report is captured in the Gap Analysis table. This ensures accountability is embedded within the organisation to deliver against these areas of commitment. The report is circulated internally within the organisation together with the feedback received from the Independent review panel. We anticipate that the report will be of fundamental interest to third parties that we interact directly with, i.e. employees, partners and

donors. The wider public and other interested parties are secondary intended audiences for the report. Finally, we hope 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.

3.6 Boundary of the report

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

3.7 Material content limitations of the report

The only material content limitations of the report relate to indicator EN16. At present the systems do not exist to allow reporting on carbon emissions relating to energy usage by offices outside of the UK. In 2013 we initiated a dialogue with our country offices to better understand the challenges of collecting this data, however it remains unclear when the energy providers in these countries will have the facility to provide the information. We hope to make further progress on this reporting in 2014.

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

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

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

The significant changes to the scope of the report from previous reporting periods relate to the inclusion of the additional indicators in conjunction with the updated level C reporting framework.

4. Governance Structure and Key Stakeholders

4.1 Governance structure and decision making process at governance level

Sightsavers has a governing Council of Trustees which consists of 16 trustees. The Council is committed to maintaining a high standard of corporate governance. Details of our trustees can be found on our [website](#). Sightsavers' governance structure is conceived and managed to allow us to be highly flexible and responsive to changing conditions, whilst conforming all operations to an over-arching vision and mission. The Council has global authority for the organisational strategy, which is implemented by our staff. All of our charitable services are performed in developing countries where programme management is structured on a branch office basis.

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

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

There are clear distinctions between the roles of Council and the 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 monitors, audit activities, risk and control framework and process effectiveness; Investment monitors, investment performance and treasury activities; Remuneration monitors, remuneration policy and key salary decisions; and Governance advises on overall governance structure, monitors legal and registration issues in the countries where Sightsavers operates and advises on the appointment of trustees and honorary officers. Committees may include specialists who are not members of the Council but who volunteer to use their expertise to assist the committees on an on-going basis.

Risk management and the maintenance of the risk register is the direct responsibility of the Chief Executive. The senior management group and Audit Committee, respectively, review and update the risk register on a quarterly basis. All relevant policies, partner contracts and control processes require compliance with relevant laws and regulations.

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

The Chair of the Council of Trustees is not an executive officer of Sightsavers. The most senior executive officer within Sightsavers is the Chief Executive, who reports to the Council.

As described in section 4.1, the roles of the Council and 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 we can reasonably achieve in a given context and time period. Trustees set the parameters, policies and values within which management and staff are free to act. Once the parameters are set, employees are empowered to make reasonable judgements about planning and organising the work to achieve the agreed aims. The trustees' role is then to monitor performance. They have their own version of the SIM card, which is based on the roles and responsibilities of trustees as set out by NCVO, and which includes KPIs which assist in performance management.

The trustees look to management for high quality, well informed advice on which to base decisions about the organisation's objectives, evaluation processes and the like. Management rely on the trustees to provide objective and challenging feedback from a non-executive perspective. This interdependence between trustees and

management recognises the fact that while trustees are legally responsible for the charity's activities, both trustees and senior management are morally responsible for the way in which the Society conducts itself.

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

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

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

Sightsavers key internal stakeholders are employees and volunteers. We do not have established formal mechanisms for employees below executive level to provide recommendations or direction to the Council of Trustees. Opportunities are provided by informal opportunities to meet, including at the Sightsavers Annual Meeting.

Formal mechanisms do exist for employees to provide recommendations and direction to the Strategic Management Team. An employee survey is held every two years that examines the relationship of employees with the organisation and the SMT. The 2013 survey reported a 94% overall response rate. Responses to questions relating to confidence in Sightsavers leadership, including trustees were all above 70% and all increases in positive responses in comparison to 2011. Additionally, 75% of 94% of staff who completed the survey agreed that 'The organisation practises open and honest communication and shares information and that information sharing systems in the organisation are effective'.

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

4.5 Compensation for members of highest governance body

Sightsavers has a remuneration committee which produces our remuneration policy and key salary decisions. Job roles are also benchmarked against organisations of comparable complexity and risk attached to roles both in and outside the NGO sector.

4.6 Conflicts of interest for governing bodies

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

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

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

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

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

Trustees serve up to two terms of four years each. No trustee has been dismissed from the Council, but the governing documents provide a process to do so for a range of reasons. The Council appoints new trustees from time to time as trustees reach the end of their terms. The process for appointment may involve advertising, consultant search, and other forms of candidate recruitment, and includes interviews and consideration by the Governance Committee prior to Council appointment. There are currently 16 trustees; the Council has had an informal target of 15 trustees for many years.

4.12. Externally developed environmental or social charters, principles or other initiatives to which the organisation subscribes.

Sightsavers subscribes to or endorses the following external charters/principles:

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

4.14 Stakeholder groups engaged by the organisation

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

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

broadly; with whom we collaborates in programmes, in research, in advocacy and in procurement.

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

4.15 Identification, selection and prioritisation of key stakeholder groups

As reported in 2012, our Programme Partnership Policy sets out the principles behind our approach to partnership and how these are operated in practice. This policy defines multiple stages of partnership, including “Exploration”, which sets out how an initial interest is identified and what minimum criteria we apply in the selection of partners. Specifically, the policy guidelines outline certain situations in which Sightsavers will not enter into partnership with an organisation. We track the development of our partnerships in line with the policy and use internally developed tools to assess the capacity and financial competence of partners.

At the end of 2013 we initiated the development of a research governance framework which sets out the governance principles for all research activities that we support. The framework will provide guidance to staff, consultants and partners on the entire research process; including conceptualisation, design, partner selection, implementation, analysis and dissemination and will be rolled out to stakeholders in 2014

Our donors are actively solicited from the general public in the UK and the rest of the world, particularly Ireland, Sweden, Italy and the United States. Our Money Laundering Policy sets out the key issues to be considered in accepting a donation from an individual, corporation or foundation. The engagement with corporate donors specifically is also governed by our Corporate Engagement Policy. We also solicit and accept donations from governmental and institutional funders. Engagement with these donors is considered on a case by case basis.

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

I. Programme Effectiveness

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

Sightsavers’ internal and external stakeholders are detailed in section 4.14. The format and frequency of our engagement differs between each stakeholder group as follows:

- We proactively communicate on a regular basis with our individual donors. This is through a variety of ways including telephone calls, direct mail packs, magazines and emails.

- We carry out regular dialogue with partners through country offices as part of programme cycle management, including during conceptualisation, design, implementation, monitoring and project closure. Additional active engagement with partners is conducted via formal project reporting mechanisms.
- As part of our organisational SIM Card, we track the engagement of partner and beneficiary stakeholders in all aspects of project design, monitoring and implementation.
- We actively engage in advocacy at the national, regional and international level. Our key stakeholders include national governments and a broad range of decision-makers at local, national and international level.

In 2013 we continued our efforts to engage with affected stakeholders in our programmes, as described in the 2012 report, through involvement in the design and implementation of programmes. During the reporting period our global indicator for measuring progress in this area demonstrated that although we marginally failed to achieve the set targets, we still maintained levels of engagement as previously reported in the 2012 report. We had a 75.15% achievement in this indicator against a set target of 85%. Further detail on the SIM Card, including performance data can be found on Sightsavers [website](#).

Sightsavers has involved affected stakeholders in the development of internal programme policies to varying degrees, depending on the nature of the policy being developed. In 2013, no new program policies were developed nor old ones revised. However in 2014 we will be reviewing key programmatic policies and will involve relevant affected stakeholders in their redesign.

As cited under indicator NGO5, in 2013 the Policy Team developed a draft Disabled People's Organisations (DPO) Strategy. The purpose of this strategy is to work towards the inclusion of DPO voices (affected stakeholders) in Sightsavers' policy work and ensure that people with disabilities are key stakeholders in the development of relevant policy.

Other important mechanisms (that include affected stakeholders) to inform Sightsavers policy making are: the participatory research project *Voices of the Marginalised* (with IDS, HelpAge International, ADD and Alzheimer's International) that draws on the experiences of persons with disabilities and older people in Bangladesh; and our continued support to the Secretariat of the African Decade of Persons with Disabilities (SADPD). This support enables SADPD to engage at regional and national level in the post-2015 process, ensuring that disability is well represented in the design of the global policy framework.

In addition, throughout 2013, we have continued to work closely with several umbrella bodies of disability organisations, including, the International Disability and Development Consortium, the International Disability Alliance, as well as UK based disability organisations. This has proved to be an effective way of capturing the views of affected stakeholders in making submissions to policy consultations.

Although Sightsavers engages with various stakeholders in various capacities for design, implementation, monitoring and evaluation of policies and programmes, the biggest challenge is evidencing the impact of such engagement. We have not currently built metrics to measure how their engagement affects the decision making

or reshaping of policies and procedures. This is an area we will include in our plans for 2015, as current work in other areas makes it impossible to conceptualise in 2014.

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

In the 2012 report, Sightsavers recognised that the existing complaints process could be improved and committed to engaging other INGO Charter members to support this effort. We have spent 2013 developing a revised approach.

In developing this approach, we have been supported by and learnt from other Charter members as part of the peer advice group on complaints handling. This has provided a forum to discuss mechanisms and the challenges that they bring to ensure that we have a policy that is workable and effective. Internally, the development has been undertaken by a working group representing all different parts of the organisation to ensure that the policy meets the needs of our different stakeholders.

The new Complaints Policy is available on our [website](#) and sets out the principles that Sightsavers upholds in processing complaints, how to make a complaint and how we will respond to complaints. This is supported by an internal Complaints Handling Procedure, which provides staff with practical guidance on how to implement the policy. This includes how to identify legitimate complaints under the Policy and how to identify those which are not relevant or are vexatious. Full details of when Sightsavers will not respond to a complaint are included in the Policy.

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

It is our expectation that all future external complaints will be made and managed through the mechanisms described in the Complaints Policy. In addition, we have two formal mechanisms in place for internal stakeholders to raise issues which are the Grievance Policy and the Whistle-Blowing Policy. Under these policies, employees are protected from any victimisation or discrimination as a result of their disclosure, provided they act in accordance with the policy. All complaints raised through these two procedures are escalated to the 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. Specific complaints mechanisms are also included within the child protection policy.

The complaints policy has been promoted to staff internally and has begun to be incorporated within business processes. 2014 will be a year of running the policy in its existing form and learning about what works and what doesn't. We will use this knowledge to refine the policy and process to ensure that it operates effectively. This will support the development of a culture which welcomes feedback and complaints.

The process for managing complaints during 2013 has been as described in the 2012 report. However, it is key to note that complaints have been managed on a case-by-case basis as they have been received, with the escalation path following the line management structure. Complaints from partners have been managed in line with the procedures set out in the Programme Partnership Policy. Fundraising complaints have been formally recorded and the numbers received are documented in indicator PR6. Only a small number of other complaints have been received in 2013.

NGO3 System for program monitoring, evaluation and learning

Globally, all programmes are monitored using our Strategy Implementation Monitoring (SIM) card. All individual projects within Sightsavers contribute to these global strategic objectives and this monitoring platform is in the public domain.

On a project by project basis during the reporting period, all projects continued to be developed using the logical framework approach. In order to harmonise the indicators across our work, we developed an indicator dictionary working with experts both internally and externally. This dictionary will be rolled out in 2014.

Systems for monitoring and evaluating progress in our projects have been described in depth in the 2012 report. However there have been some further refinements based on the learning of what works as well as quality of data/information from this system. Country strategy plans have been deactivated and we have now focused on each individual project's progress against set plans, as depicted in the logframes. We have consequently improved our outputs monitoring system and continued testing out a database. This system was described in our 2012 report.

To enhance the evaluation aspects of our programmes, we successfully recruited an evaluations expert. This person will drive key processes around effective evaluation design and learning from findings. We also developed a revised programme implementation manual (PIM). This manual maps out the key processes across the programme cycle which staff need to adhere to and thus provided good grounding for organisational monitoring, evaluation and learning processes. The key programme cycle processes in the PIM are mapped across the same processes as in our quality standards; thereby ensuring that the monitoring, evaluation, learning and quality improvement systems are harmonised.

Internally, we continue to learn using various approaches such as, research seminars, monthly learning newsletter (Signpost) and 6 monthly publications (Insight Plus). Teams also use appropriate approaches in line with our quality standards on learning. Externally, the organisation continued to engage with the rest of the sector through various forums to share its learning, including:

1. Presentation at Webinars and International Conferences

One of Sightsavers' senior programmes staff presented the organisation's experiences in Information Disclosure Policies at the INGO Charter Webinar in December, 2013. Sightsavers also presented at international conferences and below are some of the topics and conferences that were participated in:

- Research on cost-effectiveness of cataract and refractive error in Zambia and cost and benefits of elimination of avoidable blindness (The International Health Economic Association in Sydney in July 2013).
- Global mapping of prevalence of trachoma and an analysis of costs of NTD mapping (Annual meeting of the American Society of Tropical Medicine and Hygiene in Washington in November 2013).
- Research on primary eye care training in Tanzania (International Society for NTDs in London in October 2013).

2. Publications in peer-review journals

During the reporting period, we shared our findings and learning in some peer journals. A study of ocular morbidity in Kenya was published in 2013 in Public Library Of Science (PLOS) ONE and a systematic review on climate and trachoma was published in 2013 in PLOS NTD.

3. Improved our learning and research pages on Sightsavers' website

This work is still on-going. In 2013 some improvements were made to Sightsavers' research and learning pages, where abstracts are now shared and full study reports of publications based on Sightsavers' research. The organisation is still working to improve how it shares evaluations and other learning materials. During the same year Sightsavers also invested heavily in internal sharing mechanisms and the learning strategy will help to tie the culture needed to develop around learning and knowledge sharing.

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, including age and ethnicity, has been systematically included in the design and implementation of Sightsavers' programmes since 2011. During the design of projects and programmes, staff are required to articulate how they will address specific gender and diversity concerns related to a project within the Concept Note.

Sightsavers also considers issues of gender and diversity in programme monitoring and, as of 2011, our country offices are expected to disaggregate all output data by gender. In 2012, we introduced the disaggregation of data by age group within the constraints of how government health and education partners collect data. During 2013, we conducted an internal output statistics audit that looked into all quality issues related to the data collection process. Gender disaggregation was an area noted for improvement in the audit recommendations. In response to this recommendation, all country teams were engaged in discussions to build on the quality of data collection and the output collection guidance was rewritten with greater emphasis on collection of disaggregated data. We will continue to use data disaggregation to inform data collection and appropriate policy changes.

As would be expected, our projects are often focussed on the disability aspect of diversity. This includes projects that empower people with disabilities to raise their voices and access their rights, support Blind and Disabled People's 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. In 2014 Sightsavers are continuing to explore ways of improving data quality and will be piloting a disability data disaggregation project looking at disaggregating

output statistics in our eye health and Neglected Tropical Disease work by disability, which will provide more focused data on our beneficiaries. This is at the leading edge of disaggregation work in disability and development and we will be sharing findings widely, particularly with those looking at the “data revolution” aspects of the post-2015 development framework.

As described in the 2012 report, in 2013 Sightsavers invested in the development of a programmes database to improve the recording of outputs at the country level, as well as central consolidation. The pilot began in 2013 with added deliverables and full roll out scheduled for 2014. We will be developing a statistical tool as part of this project which will allow for disaggregated data to be visualised and reported on, helping to measure the impact of programmes on beneficiaries of different diversity groups.

We believe that with a combination of better data, and appropriate focus on diversity issues as programme planning and monitoring stages, it can make great progress over the strategic period. Our 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

Policy and Advocacy remain critical functions within Sightsavers as the organisation seeks to influence change at national and international level to policy and practise. Guided by the organisation’s three change themes, the Advocacy and Policy teams respectively seek to lobby national governments and a broad range of decision-makers at local, national and international level to deliver demonstrable improvements in health, education and social inclusion. “Develop effective and joined-up advocacy” is a key SIM card objective for both the Advocacy and Policy teams respectively, with national and international level indicators.

From Sightsavers’ perspective, the post-2015 agenda (poverty reduction, access to quality health and education services and equity) and the WHO Action Plan for the prevention of avoidable blindness 2014-2019 (eye health) remain our central advocacy objectives and they drive both team’s activities and political engagement. Other key global advocacy objectives include the legislation of the World Intellectual Property Organisation Treaty for copyright amendment and the implementation of the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

We aim to ensure that our policy and advocacy work is consistently of a high standard and informed by research and evidence. To ensure continued consistency in this area a Policy Development Guide (appendix 3) was developed in November 2013, aimed at promoting good practice in policy development. The guide seeks to draw a closer link between the policy change desired (the intended outcome) and the policy paper (the output). In addition, in 2013 the Policy Team developed a (draft) Disabled People’s Organisations (DPO) Strategy. The purpose of this strategy is to work towards the inclusion of DPO voices in Sightsavers’ policy work and ensure that moving forward, people with disabilities are key stakeholders in the development of Sightsavers’ policy work. The strategy is being finalised and implementation is currently being planned. To date, both of these documents have only been shared internally.

It is critical that our relevant policy and advocacy positions accurately reflect the experiences of people living with a disability. In 2013, the final report of the Voices of the Marginalised pilot project was delivered. Entitled 'We Can Make Change', this participatory research project (achieved in collaboration with IDS, HelpAge International, ADD and Alzheimer's International) draws on the real-life stories of persons with disabilities and older people in Bangladesh, providing valuable testimony of the considerable equality and poverty challenges they face. The voices of people from this research have been reflected in numerous policy outputs, including Sightsavers' submission to the International Development Select Committee on disability in November 2013.

Sightsavers policy and advocacy work is coordinated at senior level by the International Advocacy Coordination team (IACT) which reports to the International Advocacy Strategy Group (IASG) comprised of the members of Sightsavers' Senior Management Team (SMT). The IACT group recommends specific advocacy themes for Sightsavers each year. This methodology ensures consistency across the organisation in these thematic areas. Both the Global Advocacy Team and Policy Team respectively share their annual plans and consult and meet on a regular basis.

In order to ensure consistency in approaches and messaging for advocacy at all levels, especially country and global, our Global Advocacy Team has developed guidance tools around our work on the post-2015 Agenda and with shadow reporting on the implementation of the UNCRPD.

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

As reported in 2012, we do not have a process for corrective adjustment of advocacy positions and public awareness campaigns, although responsibility for taking corrective actions lies with the Advocacy and Policy teams respectively overseen by IACT and IASG. In December 2013, Sightsavers launched its first public policy campaign Put us in the Picture. Targeted at the UK's Department for international Development (DFID), the campaign is calling for DFID to make development policy inclusive of people with disabilities. Should the need arise to make corrective adjustments in this, and other, policy positions, Sightsavers will take responsibility for such actions, but as yet this area remains untested. There have been no corrective actions taken over the past 12 months.

The 'Put us in the Picture' campaign was developed as part of a longer-term five year campaigning strategy for the organisation. In May 2015, after the successful completion of the first policy campaign we will evaluate its progress against objectives, successes to date and review whether an exit strategy is required or whether the organisation will continue to use policy campaigning as a vehicle to deliver its wider organisational objectives.

Our policy positions are published on our website and internal intranet. In the UK, policy positions are disseminated to key targets in Westminster and Whitehall and used as a basis for additional briefings (for example to brief MPs or Peers in advance of relevant Parliamentary debates). At international level, policy and advocacy materials are disseminated to a range of other critical advocacy targets including, but not restricted to, UN agencies, bi-lateral and multilateral agencies, the World Health Organisation, other non-governmental organisations, disabled people's organisations and governments in the countries in which we work.

In terms of communication, a dedicated Senior Media Officer (Policy) works with the team to disseminate our policy and advocacy messages and we have also developed a social media strategy (for internal use), aimed at ensuring that the policy team's presence on social media is considered, targeted open to scrutiny and reflects the policy team's objectives. The recruitment of a Social Media Manager has enabled the teams to reach public and policy professionals and disseminate positions, more effectively and in a more timely manner using twitter.

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

Sightsavers continues to prioritise engaging with and leveraging our strategic network and alliances, as this is vital for us to reach our strategic goals. This is captured within the SIM card and features as a key component within Sightsavers' strategic approach in the areas of eye health, inclusive education for children with disabilities, and social inclusion.

Approach to partnership

We define our approach to account for and coordinate the activities of partners through the organisational programme partnership policy. The policy focuses on project partners and focuses on selecting and working with these partners to increase capacity to support long term sustainability within the programmatic work. With increasing complexity within our partnership network, partners can be categorised into:

1. Global strategic alliances
2. International programme partnerships
3. Implementing project partnerships

The first category, global strategic alliances includes international bodies and professional associations that we actively support to coordinate efforts to influence change and share learning. These organisations include the International Agency for the Prevention of Blindness (IAPB), where we contribute through participation on several working groups and funding arrangements. In addition, Sightsavers supports the International Disability and Development Consortium (IDDC) and WHO-Afro, as well as international initiatives involving several other actors targeting specific health interventions like the African Programme for Onchocerciasis Control (APOC) and the International Consortium for Trachoma Control (ICTC).

The international programme partnerships directly support programmatic work through co-design, learning, and support to implementation. These partners include international eye health INGOs like Fred Hollows Foundation, Helen Keller International, Brien Holden Vision Institute, and INGOs from other sectors, like

WaterAid. Private sector partnerships, such as with Luxottica and Unilever, are leveraged to increase effectiveness of our programmes, through sustainable vision centres for refractive error and behaviour change with hand and face washing to prevent Trachoma. Merck and Pfizer have been instrumental in supporting our NTD work through donation of medication. Research institutes, like London School of Hygiene and Tropical Medicine and Imperial College are involved with baseline assessments to guide programme design.

The implementing project partnerships include local NGOs, CBOs and Ministries of Health and Education, in the countries where we work. These partners are involved in every step of project design, implementation, and monitoring/evaluation. We work with these partners to increase their capacity to deliver sustainable programmes through supporting training, processes, and infrastructure development, where indicated. By building the capacity of partners, we believe that this will support the sustainability of the programmes after the financial support from Sightsavers has ended. These areas are built into the programme design.

We need to improve our evidence-base to demonstrate that the partners have the increased capacity to sustain programme activities, and we are taking actions to improve in this area. Actions include:

- Building sustainability/exit plans into every project design with a phased approach to the reduction in financial support where appropriate.
- Evaluating long-term sustainability of programmes following the cessation of funding, especially in countries/programmes the organisation is/has exited from.

To ensure that the partners meet high standards of accountability, Sightsavers carries out a 'capacity assessment tool' and a 'financial assessment tool,' as specified in the Programme Policy Guidelines from 2008. These tools are meant to measure partners' capacities around financial, accounting, planning, and compliance to regulatory aspects.

The goal of engaging in these partnerships is to coordinate activities amongst actors, both local and international, to reduce programme duplication and to increase impact and promote learning.

Planning and learning in partnerships

Whenever a programme is conceptualised in the initial planning phase, our country offices with support from global technical experts, ascertain the most suitable partner to work with. Programmes are then co-designed and implemented with the partner. Learning is shared at stakeholder meetings before, during, and after program completion.

Strategic alignment process

In 2013, Sightsavers began a process of strategic alignment to bring its global portfolio of programmes in alignment with the organisational and thematic strategies. The eye health and education strategies were finalised, with a key component related to the promotion of effective partnership and alliances in design, implementation and learning from programmes. The strategic alignment process builds on the organisational and thematic theory of change and takes a much more

strategic approach in how programmes are conceptualised and designed to improve partner coordination to have a higher impact on the beneficiaries.

Challenges and future actions

1. Formalised programme design process - despite the progress that Sightsavers has made in the strategic alignment process, the organisation needs to finalise the global portfolio, and formalise the process by which programmes are designed.
2. Revision of the partnership policy - as Sightsavers' network of partnerships have become more complex with the organisation working with partners working at different levels, the policy needs to be revised to reflect this, especially with private sector and governments.
3. Increase effectiveness of shared learning - Sightsavers needs to adopt innovative means to capture and share learning to improve programme design across the global programmes and within its partnerships.

II. Financial Management

NGO7 Resource allocation, tracking and control

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 our progress towards achieving our strategic objective of using resources strategically and efficiently and is geared towards SORP compliance.

Sightsavers' accounting aligns with the UK charity SORP. Annual accounts are produced which are audited by an independent auditor in line with International Auditing Standards - http://www.sightsavers.net/about_us/publications/default.html

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 our organisational strategy, which guides our country programmes' long term strategy plans, with rolling three year programme portfolios detailing how these plans will be achieved. New programme activity to strengthen and increase the impact of these plans is developed in line with a clear understanding of country strategic direction. Gaps are identified centrally by our Strategic Programme Development Team and new programmes are developed with country programmes to fill them. Key programme, planning and finance staff are involved in the development of the programmes from the start.

In 2013, we reorganised the annual planning process in 2013 so that fundraising cost centres develop their plans first. The outcome of this is a funding envelope, which is the starting point for programme and support cost planning. Programme planning is activity based and is undertaken at a cost centre level, informed by

discussions with partners. 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 finalised 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 information is summarised in monthly management accounts which allows management to track the use of resources.

We have 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 here on our [website](#).

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

Sightsavers has a strategic objective of growing and diversifying income. This is driven by a desire to increase organisational impact and to reduce the risks inherent in over-reliance on a narrow field of donors. We have historically had high levels of voluntary income from individuals, corporates and trusts, but have dedicated additional resources to growing institutional funding. This is driven by an evidence-based belief that there is a mutually reinforcing element to having policy, programme and funding relationships with key international development donors, rather than only one or two of these aspects.

Successful plans to meet these objectives, and increased resources dedicated to this area of work, have meant that we have seen significantly increased income from institutional donors over the last five years. We anticipate that this trend will continue in the short to medium term.

We have also seen increases over this period in the donation of Mectizan® tablets from Merck and Co. Inc. to treat onchocerciasis and lymphatic filariasis (LF). Gift in kind income is recorded in the accounts at its value and offset by an identical value of expenditure. Given the nature of the donation, there is minimal dependency resulting from this income, even though it is significant.

From the 2013 Annual Report and Accounts, the categories of income are as follows (along with comparative figures for 2012):

Category	2013 £'000	2012 £'000
Gifts-in-kind	152,587	119,836
Individuals	17,557	17,127
Legacies	9,709	7,399
Incoming resources from charitable activities	9,062	3,066
Grants within voluntary income	6,926	6,921
Companies	1,865	2,067
Trusts	1,221	1,437
Community service and other organisations	457	467
Investment income	189	166
Other	115	143

The five largest donors and the value of their contribution are as follows (with comparisons for 2012). This excludes Merck and Co. Inc. as their donation is not direct income for Sightsavers:

Donor	2013 £'000	2012 £'000
UK Department for International Development	8,389	4,522
European Commission	3,179	2,133
Irish Aid	1,332	1,273
Helen Keller International	539	178
USAID	450	61

III. Environmental Management

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

Sightsavers' activities do not lead to direct emissions as defined. All emissions are indirect and incidental to our operations.

Sightsavers' largest office is the head office located at Grosvenor Hall, Haywards Heath, West Sussex in the United Kingdom. The figures in the table and its comparative below relate to the head office location only. All conversions to CO2 are reported based on information provided by our energy provider.

Electricity and Gas used at Grosvenor Hall January – December (previous 3 years data)						
Type	Consumption (kWh)			CO2 (tonnes)		
	2013	2012	2011	2013	2012	2011
Gas	24,833	112,372	37,841	4.57	20.24	6.124
Electricity	306,656	236,988	347,915	148.30	131.92	192.724
Total	331,489	349,360	385,756	152.87	152.16	198.848

In 2013, electricity consumption increased by 30% since 2012. This was largely due to an increase in Sightsavers' employee levels and the extension of office opening hours. In April 2014, we will be moving to managed offices and in order to keep capital costs down; we did not replace faulty boilers during 2013. This resulted in electric heaters being used in some areas of the building, and a significant reduction in gas consumption.

Sightsavers hopes to see electricity reductions in the next report, following both the office relocation and additional servers moving offsite (from February 2014). Currently, systems do not exist to collate data from overseas offices in respect of indirect greenhouse emissions for buying gas, electricity or steam and this is unlikely to change until local energy companies have the facility to calculate the carbon emissions resulting from energy generation. In 2013, we approached 13 of our overseas offices to obtain more information regarding their energy consumption. Responses stated that there are limited energy suppliers, many of which are government led. It was recorded that 8 of the 13 offices use energy efficient light bulbs and two reuse paper. In 2014, we will explore ways to work with offices to improve on this.

Business Travel

Nearly three quarters of Sightsavers' business related air travel (globally by value*) is booked via a central process using a travel management company (TMC). The TMC provide carbon footprint reports and for Emirates flights, we use an online carbon calculator. The remainder of business related air travel is booked by local offices directly in country and, at this time, there are no processes in place 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.

From Q2 2014, all international air travel will be booked via the central system using the TMC, enabling us to report on CO2 for all international travel. We are unable to report on rail/driving costs.

Air travel spend	Jan - Dec 2013 (£'s)	Jan - Dec 2013 (%)	Jan - Dec 2012 (£'s)	Jan - Dec 2012 (%)
Travel Management Company	564,844	73.2%	479,824	66.89%
Skywards tax	44,198	5.7%	19,222	2.68%
Short haul (Europe) via Easyjet etc	12,028	1.6%	6,853	0.96%
	621,070		505,899	
Air travel booked through local offices outside Europe	150,399	19.5%	211,456	29.47%
Total	771,469		717,355	

**Much of the business related air travel which is booked via the central process is funded by "Gifts in Kind" made to Sightsavers by Emirates Airlines via their Skywards "air miles" scheme, upon which Sightsavers only pays the airport tax element. During the year, Sightsavers utilised 25,825,265 Skywards miles (2012: 17,524,300) for the purpose of 279 related flights (2012: 346). In Sightsavers' annual report and accounts these have a value of £81,521 (2012: £142,000) based on the lowest economy fare available at the time of travel.*

CO2 (Tonnes) Air Travel Report		
Journey Type	CO2 (tonnes)	
	Jan – Dec 2013	Jan – Dec 2012
Short haul (Europe) - TMC	16.48	26.52
Short haul (other continents i.e. Africa to Africa) - TMC	42.03	57.25
Long haul - TMC	606.19	721.26
Total - TMC	664.70	805.03
Long haul – Skywards (donated) or BA (earned) via “air miles”	388.73	369.54
Short haul (Europe) i.e. Easyjet, Aer Lingus	3.99	4.01
TOTAL	1057.42	1,178.58

A proportion of surface business travel is undertaken in countries where we have 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 change significantly.

EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved

Sightsavers currently does not have an Environmental Management System.

Organisational initiatives to reduce energy are set out below:

- **Head office premises** – We have sold the existing UK headquarters building, a converted Edwardian convent school, and will be moving to more energy efficient office premises in April 2014. The new premises are located in closer proximity to public transport links, which provides staff with the opportunity to choose alternative transport.
- **IT Infrastructure** - Only 5% of our servers will be onsite at our new premises, which has meant only one server room being required. All ICT equipment is recycled. In 2014, we will be implementing a power saving solution that will shut down all unused PCs at a specific time at the end of each day, rather than some staff leaving them running overnight. The company TaskForceCO2, state that this solution will save an average of £30 per year for every PC on our network.
- **Overseas vehicles** - In late 2011, we began a programme to replace all office vehicles in countries where we have country offices with modern, fuel efficient, low-emission, lower CO2 Ford vehicles. For the range of Ford vehicles being purchased, the CO2/km combined figures are 199-269g/km depending on the model. This programme will continue until 2015 when all old vehicles will have been replaced with Ford vehicles.
- **Virtual Meetings** - As previously reported in 2011 and 2012, we invested in video-conferencing equipment and desktop video-conferencing facilities which were made available to all staff in all offices globally. Significant effort has been put into educating staff in 2012 in the advantages and use of tele, web- and video-conferencing. Given the nature of these changes (i.e. impacting on the total energy usage of Sightsavers), it is not possible to identify the specific amount of CO2 saved from each as it is hidden within the total bill.

- **Air Travel** – we have explored carbon offsetting options for air travel booked through the designated team in Grosvenor Hall. This works out at approximately GBP10.00 per booking, but at this time the decision has been made not to offset.

The biggest challenges in reducing greenhouse gas emissions are in the visibility of travel costs, however this will be improved in 2014 by introduction of a new policy requires our overseas offices to book their air travel (with the exception of domestic) through the central travel process (described in EN16). This will provide us with a better understanding and control of costs.

EN26 Initiatives to mitigate environmental impacts of activities and services

The main environmental impacts of our activities relate to air travel and energy consumption at the UK head office premises (described in EN16 and EN18). In 2013, we made a number of operational changes to reduce the impact of our activities on the environment. These include:

- **Invoice processing** – We improved the electronic capabilities of its e-procurement solution by scanning all invoices and recycling the paper copies. This is a significant reduction in paper storage as approximately 500 invoices are received per year, many of which are more than two pages.
- **Combined printing** - We now use one broker for business printing needs. Prior to this, teams were responsible for sourcing their own stock, resulting in multiple suppliers being used. Working with one broker means that stock is now monitored appropriately, saving the organisation money and waste. The broker will recycle out of date publication.
- **Courier services** –We use one courier company to ship all consumables and pharmaceuticals to our partners. This means that consignments can be consolidated to reduce costs and environmental impact.
- **Recycling at Head Office** – There are improved recycling facilities within the new head office premises located at printing and kitchen points. General waste bins will be reduced to encourage staff to recycle where possible.
- **Recycling as part of the office relocation** - The removal company that we are using will be disposing of any office furniture not being reused. MRT Office Services have a sustainability policy in place which ensures they will recycle as much as possible. The sustainability policy is available on the [MRT website](#).
- **Sightsavers' vehicles** - We run a fleet of vehicles which are serviced at the correct and regular intervals (thus reducing harmful emissions). The 7.5 tonne vehicles use the Euro 4 engine which is LEZ compliant. Sightsavers holds full content and goods in transit insurance.

Where possible, Sightsavers uses email, telephone and virtual meeting facilities, such as video conferencing, to plan activities prior to undertaking air travel.

IV. Human Resource Management

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

	Sightsavers	Europe	UAE	WARO	ECSA	India	SE Asia
Total							
Full time		132	3	109	53	44	42
Part time		6	0	0	0	0	0
Total	389	138	3	109	53	44	42
Permanent		108	3	44	4	0	3
Fixed term		30	0	65	49	44	39
	389	138	3	109	53	44	42

In addition to this employed workforce, Sightsavers has 96 volunteers in total that are all classified as 'occasionally mobilised'. Their main functions are:

- a) Talks to community groups including schools, churches and service organisations.
- b) Classroom activities with school children.
- c) Events/conference cover.

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

We also work with university students who carry out street collections on our behalf. The precise number of students undertaking these collections varies from year to year. This is very sporadic and these volunteers do not receive any specific training for the role.

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

Sightsavers' Global Diversity and Equality Policy makes the commitment to employ a workforce that reflects the diversity of local contexts and culture. This commitment is followed through in practice where we recruit people currently resident in a country where it can not only to reflect diversity, but also 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

As part of our recruitment policy we work collaboratively together with a variety of NGOs and consultants to fill and advertise broadly, including using social media to ensure we attract the best candidates.

Region	Senior Managers	Hired locally	Proportion	
	2013	2013	2013	2012
East, Central and Southern Africa	8	8	100%	89%
India	8	8	100%	100%
West Africa	11	10	90%	92%
South Asia	4	4	100%	100%
Europe	18	18	100%	100%

LA10 Workforce training to support organisational development

Sightsavers is committed to investment in training and development across all areas of our operations. Our approach aims to recognise the different development stages of 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.

	Europe *	West Africa	East, Central and Southern Africa	India	South Asia
Average hours training per employee	6.4	3.77	3.7	7.11	18.22
*Category breakdown					
Executive Directorate	6.7				
Funding & Marketing	6.6				
Policy & Strategic Support	5.7				
Finance, Planning & Operations	5.2				
International Programme Operations	2.6				
International Fundraising	4.2				
Neglected Tropical Diseases	0.0				

Overall there has been a reduction in the number of training hours in 2013, from the data reported in 2012. The Development of Country Level Teams (DCLT) programme concluded in quarter one of 2013 and has been followed up with the introduction of the competency assessment framework, which allows Country and Regional Directors to focus on identifying and addressing specific role competency gaps. The blended learning approach, using e-learning, self-study, coaching and mentoring has produced significant improvement in the country level team performance with 83% of staff performing at the required level in their role.

During 2013, there has been an increase in investment in development hours, although this is not been reflected in the average training hours reported in 2013. The introduction of the new HR System in quarter four of 2013 and changes in the

processes for capturing training hours data will provide improved and more effective data reporting for 2014.

As described in the 2012 report, we introduced the 'Changing Gear' Management Development programme in early 2013, which was aimed at employees with leadership responsibilities included within their roles. The three year development programme is delivered on a modular basis and utilises a Manager Competency Tool to enable us to tailor the programme to the needs of the participants. The first group of managers to undertake this training completed the modules in December 2013. By the end of the programme each of the managers had completed on average 84 hours of leadership development. The result of a competency based assessment taken prior to and at the end of the programme confirmed that the participants trained have demonstrated a significant uplift in specifically identified leadership competencies.

Our current E-learning platform is currently under used however during 2014 and 2015 an organisational training plan will be developed, through analysis of the P&DRs and to meet strategic objects. We will be working to establish core mandatory organisation wide training using bespoke Sightsavers e-learning modules. E-learning will form part of the organisational induction process.

The training data reported in the table above reflects the internal reporting systems through the HR database and the figures supplied to the Strategic Management Team on a twice-yearly basis. The employment categories used by this database are directorate and geographic and so the data above is broken down in this way. A "grading" type approach (e.g. showing senior management, middle management, administration etc.) is not adopted as we do not have set salary scales, meaning that the data is not captured in this way. This is consistent with the data presented in each LA indicator.

Of the 96 UK based volunteers identified in LA1, 40 received updated training focused on delivering service organisation talks during September and October 2013. The remaining volunteers were also invited but chose not to attend and therefore did not receive any training. One new volunteer was recruited and trained in 2013. The 10 regional coordinators had one meeting over two half days in 2013 to allow them to fulfil their additional responsibilities.

LA12 performance reviews and career development plans

The data below is a report on the percentage of employees receiving a Sightsavers' Performance and Development Review (PDR), which includes both performance assessment and personal development plans. The PDR process, revised following feedback from the 2011 employee survey, is now in its second year. The 2013 employment engagement survey reported an increase in positive feedback from on employee satisfaction with the PDR process. Our global HR team uses the PDR to support employees to put in place development plans for the year ahead. The outcome of the development plans will inform the global training plan for 2014.

The introduction of the competency framework assessments in 2013 has also assisted managers and staff in our country and regional offices to view regular and focused review of performance as a core activity. Competency framework

assessments take place Q2 and inform performance and development reviews at the end of the year.

The Management Development Programme focused on improving the competency of leaders in specific management competencies. Having assessed the managers who have now completed the programme, using a management competency based assessment tool, the evidence confirms that there has been a significant uplift in their overall management competencies.

Our HR department are focusing on the development of a new organisation wide induction programme in 2014, which will be implemented during quarter one 2015. Included within the induction process, performance management training will now feature as a standard element of each new manager's induction.

The table below shows the percentage of people receiving a PDR in 2013.

	<i>Sightsavers</i>	<i>Europe</i>	<i>West Africa</i>	<i>East, Central and Southern Africa</i>	<i>India</i>	<i>South Asia</i>
% Completed	93.4%	67%	100%	100%	100%	100%

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

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 our HR database.

The split between the different governance bodies of Sightsavers is outlined under indicator 4.1 of this report.

	Strategic Management Team		Trustees	
	2012	2013	2012	2013
Total	8	6	16	16
Gender:				
Male	5	4	13	12
Female	3	2	3	4
Ethnicity:				
White	7	6	11	12
Black	1	0	2	2
Asian	0	0	3	2
Age:				
Under 30	0	0	0	0
30 - 50 years	6	5	4	4
Over 50	2	1	12	12
Disability	0	0	2	2

	Sightsavers		Europe	West Africa	ECSA*	India	South Asia
	2012	2013					
Total	402	398					
Gender:							
Male		209	47	68	33	32	29
Female		187	97	33	24	32	14
Ethnicity:							
White							
White British			120	1	1		
White Other			8				
White Irish			1				
White Black Caribbean			1				
Black							
Black African			2	99	56		
Black Caribbean			1				
Asian							
Asian			2				
Asian Other			2				
India							
Pakistan							
Bangladesh							
Sri Lanka							
Age:							
Under 30			28	4	0	6	4
30 - 50 years			106	77	49	38	35
Over 50			12	17	6	5	4
Disability			5	4		2	2

* East, Central and Southern Africa

We are in the process of introducing a new HR database, which will allow improved collection of data on ethnic origins of employees. A review of the data being transferred from the current system to the new database is in progress and this review will enable us to better understand how to collect ethnicity data from across the region and country offices.

The Disability in the Workplace Policy was rolled out in quarter one of 2013, however there has been a fall in the number of Sightsavers employees classified as having a disability.

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

Sightsavers does not have staff committees however the following mechanisms are in place for staff raise grievances to managers:

- **Grievance Procedure** - This mechanism is documented in the employee handbook and is the process that employees can follow to raise complaints on

issues directly affecting them. The full procedure is detailed in the handbook. Every grievance raised through this process is accorded attention, investigated and brought to a reasonable conclusion.

- **Performance Reviews** – Performance reviews are conducted for every employee on an annual basis, whilst recognising the importance for regular reviews to be carried out throughout the year. Employees are provided feedback on their performance and are given opportunity to feedback on any areas of concern. The documentation goes beyond the direct line manager to the manager's manager. This ensures feedback reaches the appropriate quarters and any remedial action is taken.
- **Regional Meetings** - Regional level meetings are held annually. Key organisational issues are communicated at these meetings and staff have the opportunity to discuss concerns and to provide feedback.
- **Whistle blowing Policy** - Employees are able to make use of this anonymous process where they have complaints of any improper or illegal conduct within any part of the organisation.
- **Employee Surveys** – This is an organisation-wide process conducted every 2 years, with the most recent survey carried out in May 2013, resulting in 94% participation from employees. Results from this exercise are a major source of feedback to the organisation on areas of employee concern, improvements made from previous issues raised as well as areas employees are most content with. The results of the employee survey provide information on the state of the organisation to the board of Trustees which is the highest governing body. Results from the survey are used to continuously improve employee engagement through finding practical solutions to improving areas of concern.
- **Human Resources directorate** - Each of our geographic regions is supported by a Human Resource Partner. Employees make use of this channel to provide feedback on areas of issue or concern.

V. Responsible Management of Impacts on Society

SO1 Impact of activities on the wider community

As discussed under NGO6, in September 2013 Sightsavers began a process of strategic alignment to bring its global portfolio of programmes in alignment with the organisational and thematic strategies. As a result of the strategic realignment process, a number of projects were identified for exit.

To ensure consistency of approach in implementing and managing the exits, we created guidance, including clear timelines and a set of tools and resources. Whilst exit work is overseen from the centre, country offices are ultimately responsible for leading the exit process, including communication with partner organisations, identification and mitigation of potential risks, documentation of close-out considerations such as asset management, financial arrangements, and final reporting. Partners and, where applicable, beneficiaries have been informed as early in the process as possible, and involved in exit work where appropriate.

Effectiveness of process - The 2013, exit process was the first major activity involving a large number of projects, thus allowing us to have a body of data to analyse. The paucity of information and guidance within the sector surrounding approach to exit has been acknowledged; as such, Sightsavers is keen to learn from

the processes. So far there are clear areas for improvement already evident, such as longer timeframes for close-out and greater partner consultation. Exit resulting from the process of portfolio rationalisation has also highlighted the need to ensure that close-out is built into the project from the outset. With this in mind, we are working to incorporate generic procedures and considerations into its 'Programme Implementation Manual' so as to better guide countries at the project design stage. It is expected that the incorporation of these recommendations into formal processes of project development will ultimately improve sustainability outcomes, given the greater focus on identifying a project end-point and adequate preparation for this.

All feedback and learning will be incorporated into future exit work so as to improve and strengthen the process and its outcomes. Our recently introduced complaints policy described in NGO2 will go a long way in helping us capture the feedback we get from communities as well as deal with as provided for in that policy.

SO3 Process for ensuring effective anti-corruption policies and procedures

Sightsavers has specific organisational policies regarding fraud, money laundering and other types of corruption. A deterrent effect is also in place as a result of our employment policies and partner contracts. The main plank of day to day prevention and detection is the strong control framework to prevent and detect fraud that is set out in the Financial Framework. This document is well known and implemented around the organisation, with compliance supported by internal and external audit visits to Sightsavers' locations of operation. There is an on-going programme of development of this Framework with formal updates undertaken every two years. Each formal update is followed by a round of training sessions with each office on the key changes that have been made.

We do not have a stand-alone training programme for employees on our policies and procedures that relate solely to anti-corruption. 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. This includes reference to the need to report any instances of bribery identified.

Sightsavers last undertook a risk assessment in this area in 2011 on the introduction of the UK Bribery Act. These happen periodically to inform the development of policies in this area. The key risks identified in 2011 related to the geographical spread of our work and the high levels of corruption in some countries of operation.

This approach has been in place for a number of years and we believe that it has been effective at raising awareness of these policies during that time. This can be evidenced by the fact that fraud reports have been received in line with the provisions of the fraud reporting policy (see SO4). However, we are always looking to develop our approach and have started to make improvements as part of the review of the global induction process. These improvements will go further in explaining how the policies are to be implemented in practice. This is the first outcome of the review of anti-corruption activity that Sightsavers has been undertaking. It is expected that others will follow in 2014.

In addition to the activities above, we have also developed a revised approach to complaints handling which it is hoped will enable any external concerns to be captured. This is being rolled out in 2014.

SO4 Actions taken in response of incidents of corruption

Sightsavers has a zero tolerance approach to corruption in all forms, including fraud, money laundering and bribery. As a result, we are committed to investigating allegations of corruption and taking action where corruption is proved. This is underpinned for employees by the Disciplinary Policy, where it is defined as gross misconduct and for partners by the Project Funding Agreements that are in place.

The key policy relating to the identification of corrupt activity is the Fraud Reporting Policy. This defines the process for reporting and investigating fraudulent activity. The activities and controls that are likely to identify this activity are defined within the Financial Framework. Seven reports were received in 2013 under this policy. The reports received are analysed in the table below:

Location	Report	Outcome
Sightsavers	Theft of laptop by third party	Theft confirmed. Requirements of policy reinforced with staff member.
Sightsavers	Theft of laptop by third party	Theft confirmed. Requirements of policy reinforced with staff member.
Sightsavers	Theft of laptop by third party	Theft confirmed. Requirements of policy reinforced with staff member.
Sightsavers	Theft of laptop by third party	Theft confirmed. Requirements of policy reinforced with staff member.
Partner	Fraud committed at partner in non-Sightsavers funded programme	Sightsavers undertook an audit of its own funding and found no evidence of fraud. No further action.
Partner	Alleged fraud committed by employees of the partner. Identified through partner monitoring activities.	Partner organisation investigated and confirmed two instances of fraud totalling less than £10k. Funds were recovered as far as possible and employees dismissed.
Partner	Alleged fraud committed by employees of the partner. Allegation made by an employee.	Investigation identified no financial loss resulting from fraud. However, it was found that the partner showed false documentation to the auditor during the investigation. Partnership terminated as a result.

No legal cases have been brought against Sightsavers regarding corrupt practices.

VI. Ethical Fundraising

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

Sightsavers has fundraising operations in several countries, although the UK and Ireland represents the majority of the activity. The other operations are based in India, UAE, Sweden, Italy and the US.

In the UK, we are a member of the Fundraising Standards Board (FRSB) and the Institute of Fundraising and are subject to the Advertising Standards Authority. All UK fundraising is subject to the code of conduct published by the Institute of Fundraising which covers among other things, fundraising materials and the use of case studies, donation handling, transparency, restricted funding requests, engagement with external fundraising agencies. The code can be accessed through the Institute of Fundraising website.

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. It is also subject to the ASA'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 Code of Practice for Fundraising as set out by the Irish Charity Tax Reform.

In the US, 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.

Insamlingsstift Sightsavers International Sverige is registered with Svensk Insamlings Kontroll who regulate fundraising activities in Sweden. They issue us with a bank account prefixed with 90, which acts as a kite mark of legitimacy for NGO's among donors. As part of that standard we are required to follow various local codes of conduct about fundraising activity and expenditure.

We are 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 recognised 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.

In the UK, our FRSB membership requires us to submit an annual report on complaints and compliance. At the end of the year, Sightsavers must submit a report to the FRSB showing the number of complaints received, broken down by activity. For 2013, these were reported as follows:

Type of fundraising	Volume	Complaints
Telephone fundraising	8,500	10
Addressed pieces of direct mail	731,544	57
Un-addressed pieces of direct mail	0	0
Email fundraising	316,206	0
Outdoor advertising	54,231,185	3
Television adverts	17,706,000	0
Press advertising	4,796,496	0
Magazine / Newspaper inserts	5,973,062	0
Prospect face to face fundraising	0	0
Outdoor events	27	0
Volunteer fundraising	125	2
Fundraising from business	65	0
Trusts and foundations	803	2
Major donor fundraising	-	1
Online fundraising	21,250,039	-
Gaming activity	212,735	16

No complaints were received regarding data protection issues.