

Accountable Now

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Taiwan Fund for Children and Families Independent Review Panel Feedback

Accountability Report 2015
Review Round November 2016



Taiwan Fund for Children and Families

Feedback from the Independent Review Panel

Review Round November 2016

02 January 2017

Dear Betty Su-chiou Ho,

Thank you for submitting your Accountability Report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen your accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below. Before we share this with you, however, we want to highlight a few issues of concern that we found throughout most of the nine reports assessed in the last review round.

Closing the feedback loop with stakeholders (NGO2, NGO9)

A [recent study](#) on 40 international civil society organisations' (CSOs') accountability practices - conducted by the *direct impact group* on behalf of Accountable Now - revealed that only three out of these 40 CSOs responded with an appropriate answer to a complaint test within three weeks.

This is alarming. All Members of Accountable Now should have a fully functioning feedback mechanisms in place. However, when checking your reports we found a consistent lack of reporting filed complaints per type, quantity, and region as well as a total lack of information on how they were resolved. We believe this is not an acceptable level of accountability. CSOs should not only have a mechanism in place but should first be capturing complaints with the appropriate level of detail and then monitoring their resolution and agreeing what actions need to be taken to ensure the same issues do not arise.

[Feedback Labs](#), with whom Accountable Now collaborated on the [Digital Accountability project](#), also serve as a valuable source of information on how to close feedback loops.

Collaboration with partners, communities and networks (NGO6, EC7 & SO1)

As part of the [10 Accountability Commitments](#), Accountable Now Members commit to working in genuine partnership with local communities and partners. With increased



globalisation of information, more empowered citizens engage and civic space is challenged, it becomes ever more important to help local communities and partners to thrive. However, we found that coordination with local communities is still an overall weakness area among the Accountability Reports we received. Some “common” ICISO practices can have intended or unintended consequences on local communities. We would thus like to particularly highlight a lack of contributions to building local capacity and resources. Do you take into account local market conditions and think about working alongside local organisations building their capacity? We suggest that ICISOs should start to consider their impact on the sustainability and independence of local civil society in all their work (such as planning, budgeting, economic impact, etc.).

Adding to what people do to improve their lives (NGO3)

To state the obvious, impact measurement is important. However, many evaluations mentioned in received Accountability Reports focus on collecting relatively large amounts of data on people reached, however, this does not tell us much about the improvement in their lives. Moreover, we should critically ask ourselves: What is the ICISO’s credit in this improvement and what positive impact is actually due to the people and beneficiaries themselves?

While we are of course aware that resources are limited, there is clearly no substitute for a robust and honest impact evaluation of our programmes and activities.

Organisation-specific feedback to the TFCF:

Taiwan Fund for Children and Families’ (TFCF) first accountability report is complete, comprehensive and particularly solid for being a first report.

Having joined Accountable Now in April 2015, their first report would have only been due on 2016 by end-2017. It is thus commendable that the organisation reports way before the actual due date. In terms of **institutional commitment**, the CEO demonstrates a strong commitment to accountability for TFCF. Accountability is also central to their strategic framework.

The Panel appreciates the additional overview of examples of films, webpages, or social media demonstrating examples and evidence of what TFCF has achieved with their programmes in Taiwan and beyond. However, a general lack of **evidence** is visible throughout the report (e.g. *how* MEL changed decision-making, or that impact on local communities is actually positive). The report generally states the “right things” but the Panel wants to know more how strongly the principles are applied. Descriptive statements will sound much more powerful if supported by practical illustrations and figures. Some examples include: (a) reporting the percentage of national entities which comply with certain standards, (b) leveraging existing surveys that provide relevant hard



data, (c) thorough globally set parameters, evidenced by random national level controls or d) illustrative case studies.

Main **weaknesses** include: specification on the large Advisory Committee, an evaluation process for the Board of Directors (4.10), types and numbers of complaints received and whether these were resolved satisfactorily (NGO2 and NGO9), and a published process for fair and evidence-based advocacy positions (NGO5). The Panel has summarised these issues in the enclosed **Improvement Analysis**. This document provides a baseline for you to summarise progress made in these areas. TFCF is encouraged to complete, adjust, and complement it from their perspective.

It is appreciated that the organisation has published membership with Accountable Now on their [website](#). This visualisation strengthens the TFCF's commitment to accountability more prominently in its digital communication. All Members are now asked to upload the **new Accountable Now logo**.

Overall, the Panel approves of TFCF's first accountability report to Accountable Now – especially for putting in place a clear and accessible complaints receiving and handling process – so that the organisation is moved from Affiliate to **Full Membership** as of immediate effect.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report – as it is the case with all previously reviewed reports. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 31 January 2017.

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

Yours sincerely,

Mihir Bhatt

Rhonda Chapman

John Clark

Louise James

Jane Kiragu

Nora Lester Murad

Michael Roeskau

Saroeun Soeung



Cover Note on the Taiwan Fund for Children and Families' Accountability Report 2015

Review Round November 2016

PROFILE DISCLOSURES

I. Strategy and Analysis

1.1	<p>Statement from the most senior decision-maker</p> <p><i>Fully addressed</i></p> <p>The report's opening statement by Betty Su-chiou Ho, the CEO, demonstrates a strong commitment to accountability for TFCF. She lays out how accountability is mainstreamed into their strategic thinking and activities, displaying their accountability-central strategic framework. Priority areas are clearly linked to these strategic objectives (e.g. integration of HR management, new-generation donor developing. However, the report states that the strategic framework comprises six areas – but actually eight areas are listed. Moreover, TFCF is encouraged to think of other accountabilities besides to donors. The Panel suggests that it is most important how TFCF engages with citizens and other stakeholders.</p> <p>Overall, 2015 has been a successful year for the organisation. TFCF is pleased to have joined Accountable Now with their aim to improve their international outreach and network as well as using the membership as an external benchmark.</p> <p>In the next report, the Panel would appreciate more concrete information on how accountability is utilised among management decision-makers.</p>
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II. Organisational Profile

2.1 - 2.2	<p>Name of organisation / Primary activities</p> <p><i>Fully addressed</i></p> <p>With regards to long-term accountability, the Panel would be interested to hear more about what happens after a child is placed in a new home.</p>
2.3	<p>Operational structure</p> <p><i>Addressed</i></p> <p>The organisation provides a helpful graphical overview of their operational structure. All of TFCF head and branch offices are not-for-profit, except for the TFCF Charity Shop, which supports families to make</p>



	<p>a living through micro financing. However, clear information is missing with regard to the structure, i.e. how the central office and other country offices work, which roles and responsibilities apply, or power is separated.</p>
2.4 - 2.7	<p>Headquarter location / Number of countries / Nature of ownership / Target audience</p> <p><i>Fully addressed</i></p> <p>The report states that in all countries other than the five where TFCF has actual branch offices, the organisation operated “through the cooperation with ChildFund Alliance”. What does this mean for the work at country level? What is the relationship between the country office and the central office in Taiwan?</p>
2.8	<p>Scale of organisation</p> <p><i>Fully addressed</i></p> <p>TFCF provides an interesting overview and figures with regard to their global annual budget, numbers of members and volunteers, assets etc. However, their overseas programme which consumes about 2% of its spending (US\$392,000 in 2015) is still comparably small. The number of Advisory Committee members (2,759) seems extremely high and deserves further explanation in the next report. The Panel wants to know how the large number of Advisory Committee members works in practice and contributes to greater accountability.</p>
2.9	<p>Significant changes</p> <p><i>Fully addressed</i></p> <p>While TFCF states that “2015 was a year of growth”, the Panel notes that income has actually slightly decreased in comparison to 2014 (see 2.8). The Panel looks forward to learning more in future reports on how the new programmes for social enterprise develop in practice.</p>
2.10	<p>Awards received</p> <p><i>Fully addressed</i></p> <p>TFCF was awarded “2014 Best Social Welfare Foundation” by the Taiwanese government – for the 4th time in a row.</p>
<p>III. Report Parameters</p>	
3.1	<p>Reporting period</p> <p><i>Fully addressed</i></p>
3.2	<p>Date of most recent report</p> <p><i>Addressed</i></p>



	This indicator applies to this accountability report only. Thus, while the overview of recent reports is appreciated, this is the first accountability report from TFCF to Accountable Now.
3.3 – 3.4	Reporting Cycle / Contact person <i>Fully addressed</i>
3.5	Reporting process <i>Addressed</i> TFCF describes a cross-departmental cross-functional approach to collect the required information for this report. How is senior management involved in the compilation process? And how has internal feedback changed the report's content? The Panel is interested to see how TFCF now disseminates its first accountability report with internal and external stakeholders and how the Panel feedback is used to drive organisational improvements. Other Accountable Now Members offer staff workshops to share results, set up task forces to track developments, or summarise the information in a user-friendly executive summary (as done by Educo).
3.6 – 3.7	Report boundary / Specific limitations <i>Fully addressed</i> The only content limitation relates to a missing Environmental Management System (EN18), for which a draft is planned for 2017 with completion thereafter. The Panel would like to flag that a 3-5 year plan seems too relaxed.
3.8	Basis for reporting <i>Fully addressed</i> This report covers activities of the headquarter, branch offices and affiliates within the boundary for reporting purposes. TFCF describes sound processes in place to ensure the branch and international offices uphold the same quality standards.
3.10 – 3.12	Changes in reporting parameters / Reference table <i>Fully addressed</i>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	Governance structure <i>Addressed</i>



	<p>TFCF's highest governance structure is its Board of Directors, consisting of 15 Directors. How is the Advisory Committee linked to this structure? And what level of authority rests with the branch offices? The Panel would also appreciate a link to the mentioned Articles of Incorporation and the risk management policy in the next report.</p> <p>TFCF states that their governance structure optimally supports the achievement of their mission. It is assumed that Directors' duties listed help to progress with regard to the organisation's strategic activities (e.g. fundraising).</p>
4.2 - 4.3	<p><i>Division of power between the governance body and management / Independence of Board Directors</i></p> <p><i>Fully addressed</i></p>
4.4	<p><i>Feedback from internal stakeholders</i></p> <p><i>Fully addressed</i></p> <p>The report mentions that the staff retreat (annually) and the TFCF Management Level Meetings (twice a year) provide an opportunity for staff to come up with recommendations to the Board. Is this sufficient to empower colleagues to provide open feedback? Are there any examples of meaningful engagement between internal stakeholders and the Board - i.e. how has this dialogue triggered positive change?</p>
4.5	<p><i>Compensation for members of highest governance body</i></p> <p><i>Partially addressed</i></p> <p>The Panel would appreciate a link to the Remuneration Policy in the next report in order to better understand how salary levels actually look like. Does TFCF apply departure agreements for leaving staff?</p>
4.6	<p><i>Conflicts of interests</i></p> <p><i>Addressed</i></p> <p>TFCF is strongly urged to provide a link to the mentioned Code of Conduct. Has TFCF experienced any conflicts of interests and how were these addressed?</p>
4.10	<p><i>Process to support highest governance body's own performance</i></p> <p><i>Partially addressed</i></p> <p>Board Directors are appointed for a three-year term and can be re-elected. Is there an external or self-evaluation of the Board of Directors? If not, the Panel strongly suggests introducing some sort of Board assessment and using the results to further improve the effectiveness of this body.</p>



4.12	<p>Social charters, principles or other initiatives to which the organisation subscribes</p> <p><i>Fully addressed</i></p> <p>TFCF is a member of the Christian Children’s Fund and used to be a member of the ChildFund Alliance. Another Accountable Now Member – Educo – still is with the latter one. It would be interesting to see the whole ChildFund Alliance join as an international umbrella organisation.</p>
4.14 – 4.15	<p>List of stakeholders / Basis for identification of stakeholders</p> <p><i>Fully addressed</i></p> <p>TFCF’s main stakeholders are children and their families suffering from poverty or children suffering from violence or deprivation. Other stakeholders include partner organisations and networks, academia, funders, and volunteers. These stakeholders are clearly prioritised into groups.</p>

PERFORMANCE INDICATORS

I. Programme Effectiveness

NGO1	<p>Involvement of affected stakeholder groups</p> <p><i>Partially addressed</i></p> <p>The answer demonstrates a good feedback culture throughout the whole programme cycle management – both with internal and external stakeholders, including their social enterprises. A chart exemplifies their approach of “synergised practices”. However, some processes could be more systematised and evidenced – e.g. how exactly have results from the E system tracking fed into decision-making?</p>
NGO2	<p>Mechanisms for feedback and complaints</p> <p><i>Partially addressed</i></p> <p>TFCF’s “Regulations of Appealing Application” protect the rights of those people making a complaint towards the organisation. There are clear processes in place about the communication channels (including social media / Facebook), time frames (responses must be made within 10 days), and responsibility levels (TFCF’s Investigation Team and Social Work Department). Is there also the possibility to file an anonymous complaint? Moreover: Is there evidence that the described feedback and complaints process is well known and has led to positive change within TFCF? The Panel could not find any</p>



	<p>mention thereof on TFCF’s English website. A link to the relevant policies should be provided in the next report.</p> <p>Furthermore, the Panel would be hugely interested in the number and types (besides complaints about targeting of TFCF’s programmes and sponsorships) of complaints received within the reporting period. How many of these complaints have formally been resolved? How much have these impacted the organisation?</p> <p>Finally, valuable information on the Employee Appeal Committee should rather be reported under NGO9.</p>
NGO3	<p>Programme monitoring, evaluation and learning</p> <p><i>Partially addressed</i></p> <p>TFCF describes sound processes in place to evaluate programme impact and progress against their strategic goals (performance reports, field visits, self-evaluations, case records, data banks etc.). However, actual examples or evidence from these MEL processes would be interesting for the reader of this report, as well as <i>how</i> MEL changed decision-making. Are there any success indicators in place? Moreover, TFCF is asked to provide information in the next report on whether they publicise results from internal / external evaluations. The Panel would like to refer to Sightsavers’ SIM Card as a good practice example.</p> <p>Overall, there is a close link to the government to implement programmes outsourced by the government. A regular review of the organisation’s independent activities seems relevant in this regard.</p>
NGO4	<p>Gender and diversity</p> <p><i>Partially addressed</i></p> <p>TFCF describes how their programme inventory has helped to identify areas where the organisation could engage more – i.e. adding a new youth programme to their portfolio. The organisation also shows processes in place to identify individual stakeholder needs. However, are there procedures to identify stakeholders that risk being excluded from TFCF’s programmes, e.g. due to disability, ethnicity, and religion? Specific recommendations on girls’ rights would be useful for the programmatic level.</p> <p>Moreover, is there an inclusion or anti-discrimination policy in place to complement governmental regulations? And has TFCF set itself any improvement targets and a benchmark to track progress?</p>
NGO5	<p>Advocacy positions and public awareness campaigns</p> <p><i>Partially addressed</i></p>



	<p>It is understood that the organisation does not currently have a written published process on how they adopt a public position but that they are working on a related policy. The Panel supports this development to strengthen existing practice such as their evidence-based experiences, data bank, reviews, White Paper, and authentic situation analysis. The Panel encourages TFCF to include information on how the organisation ensures that its public criticisms are fair/accurate as well as clear exit strategies.</p> <p>In this regard, the Panel would like to refer to Amnesty International's accountability report 2013, in which they describe a very thorough process of taking into account what key stakeholders want and being accountable to them for (i) strategic choices of advocacy targets, and (ii) formulation of positions.</p> <p>Campaigns are firmly rooted in Amnesty's wider programmes, securing well-informed work and some kind of sustainability after campaign exits, which are planned from its inception.</p> <p>TFCF describes several plans on how to enhance public awareness in the years to come and the Panel looks forward to being informed on progress in this regard.</p>
NGO6	<p>Coordination with other actors</p> <p><i>Addressed</i></p> <p>TFCF chooses its partners based on common interests and through its online case management systems (see NGO3). A more systematic outline on how this helps to leverage each other's work rather than duplicate existing activities would be helpful in the next report. Some examples for successful partnerships are mentioned (e.g. governmental policy refinements due to joint CSO efforts). More information on the membership with the Christian Children's Fund and previous membership with the ChildFund Alliance would be relevant at this point. Are there also examples for necessary refinements of partnerships?</p> <p>The Panel stresses the importance to ensure that partners meet high standards of accountability. In addition to the mentioned exchanges, trainings or capacity building in this regard, the Panel would like to suggest setting out clear criteria or a memorandum of understanding with actual partners. Finally, how does TFCF promote learning from the work of other actors?</p>
<p>II. Financial Management</p>	
NGO7	<p>Resource allocation</p> <p><i>Fully addressed</i></p> <p>TFCF describes a very thorough system in place to track resource allocation in compliance with internal standards and regulations from the government of</p>



	<p>Taiwan. The organisation shared the independently audited financial accounts with the Panel. In addition, TFCF is encouraged to also upload these on their website for the general public. 2.8 also lists budget allocations to different areas, i.e. programmes, charitable activities and governance costs.</p> <p>Finally, some information is confusing: While the report states that income is US\$ 149 million, it then goes on to list about US\$ 31 million in programmes, services and charitable activities. What about the rest? The more detailed financial statements submitted to the Panel are more complete (shows US\$ 119 million on programmes; US\$ 19 million on admin, equipment etc.) but a fully comprehensive response would be appreciated in the next report.</p>
NGO8	<p>Sources of Funding</p> <p><i>Fully addressed</i></p>
<p>III. Environmental Management</p>	
EN16	<p>Greenhouse gas emissions of operations</p> <p><i>Fully addressed</i></p> <p>TFCF provides an overview of their direct greenhouse gas emissions in relation to water and electricity consumption for 2013 to 2015. Most figures stay similar over the years; however, why is the “rate of water bill” so much lower in 2015? The Panel also encourages factoring in issues such as staff travel in future measurements – even if this is more difficult to measure.</p> <p>The Panel suggests checking out Greenpeace’s greenhouse gas emissions management tool CloudApps Sustainability, which enables Greenpeace’s national offices to receive detailed reports on their current and historic emissions and to receive a benchmark of their environmental performance against other national offices.</p> <p>It is understood that these figures only relate to the offices based in Taiwan and not abroad. Are there any plans to measure greenhouse gas emissions outside of Taiwan?</p>
EN18	<p>Initiatives to reduce emissions of operations</p> <p><i>Addressed</i></p> <p>TFCF lists many commendable initiatives to reduce greenhouse gas emissions and has set itself improvement targets. While there is no Environmental Management System in place yet, the organisation mentions in 3.7 that they aim at having developed a draft by 2017. The Panel will check in on progress but generally regards 3-5 years for implementation as too slow.</p> <p>It is finally appreciated that carbon reduction is part of TFCF’s strategic framework outlined in the opening statement.</p>



EN26	<p>Initiatives to mitigate environmental impact of activities and services</p> <p><i>Fully addressed</i></p> <p>TFCF's main environmental impacts relate to transportation and travel. Other initiatives in addition to those mentioned in EN18 are shared.</p>
<p>IV. Human Resource Management</p>	
LA1	<p>Size and composition of workforce</p> <p><i>Addressed</i></p> <p>TFCF provides relevant information on the number of staff in Taiwan and overseas branch offices, broken down in part-time vs. full-time and geographical region from 2013 to 2015. However, how many of these employees are national staff and how many are expatriates? And how many belong to senior management / executive roles?</p> <p>The number of volunteers (9,505) is provided in 2.8.</p>
EC7	<p>Procedure for local hiring</p> <p><i>Addressed</i></p> <p>The organisation does not have a local hiring policy in place but locals tend to have a comparative advantage in job interviews. TFCF states to be well rooted in local communities; however, actual figures and evidence would strongly support this argument.</p> <p>Since a lot of activities are carried out on behalf of the government, it is interesting to see how TFCF ensures not to undermine the public sector via e.g. paying a comparable salary to local staff.</p>
LA10	<p>Workforce training</p> <p><i>Fully addressed</i></p> <p>TFCF provides average training hours for 2013 to 2015. In 2015, 0.32% of the annual budget was spent on training. Overall, the organisation is very committed to improving the workforce capacities and skills.</p> <p>Effectiveness of training is evaluated by trainees' feedback and by applying the Kirkpatrick Model. The return on investment was 88% in 2015.</p>
LA12	<p>Global talent management</p> <p><i>Addressed</i></p> <p>TFCF has a solid performance review and career development system in place, ensuring sustainable succession planning for the organisation. Have actually all employees received an appraisal in 2015?</p>
LA13	<p>Diversity of workforce and governance bodies</p> <p><i>Partially addressed</i></p>



	<p>The organisation provides an interesting breakdown of people with disabilities or aboriginal origin among staff and Board. However, required information on gender relations (i.e. male vs. female staff and Board members) is completely missing. Has TFCF any experiences on working with children in their governance bodies? If not tested yet – what is the reason for this? E.g. Plan International could be consulted on how to engage children in an organisation’s boards.</p> <p>TFCF complies with a number of governmental regulations in relation to non-discrimination as also outlined in NGO4. Is there an internal non-discrimination policy in place? Has the organisation set any internal improvement targets in regard to its overall diversity?</p>
NGO9	<p><i>Mechanisms to raise grievances</i></p> <p><i>Partially addressed</i></p> <p>Overall, TFCF seems to take its staff’ health and wellbeing very seriously and regularly reviews workload and offers health check-ups and psychological consultations. Interesting information on the set-up and work of the Employee Appeal Committee is shared. However, is there experience or evidence that concerns raised were resolved satisfactorily? How were these addressed? Policies must be supported by implementation and progress.</p> <p>A link to or copy of the mentioned Whistleblower Policy will be crucial in the next report.</p>
<p>V. Responsible Management of Impacts on Society</p>	
SO1	<p><i>Managing your impact on local communities</i></p> <p><i>Partially addressed</i></p> <p>The organisation shares interesting and relevant information on their programmes and support at community level, and how this supports people on the ground. However, more details would be helpful with regards to actual processes around entering, operating and exiting. What kind of feedback has TFCF received from communities – especially from children – in 2015 and how was this used to improve the positive impact for them.</p>
SO3	<p><i>Anti-corruption practices</i></p> <p><i>Addressed</i></p> <p>The organisation mentions specific policies regarding fraud, money laundering and other types of corruption; a link to these will be appreciated in the next report. There are stand-alone training programmes on anti-corruption which will also form part of the general induction for new staff. How does the organisation know that staff is aware of the relevant regulations?</p>



	TFCF is also strict about fair recruitment processes and regulates how – if at all – relatives can work under each other’s leadership.
SO4	<p><i>Actions taken in response of corruption incidents</i></p> <p><i>Fully addressed</i></p> <p>TFCF adheres to a strict zero-tolerance policy on corruption. No legal cases have been brought to TFCF’s attention in 2015. Nevertheless, the organisation describes the appeal process in theory.</p>
VI. Ethical Fundraising	
PR6	<p><i>Ethical fundraising and marketing communications</i></p> <p><i>Fully addressed</i></p> <p>TFCF has clear and rigid fundraising regulations in place. How are children generally portrayed in fundraising? Are major institutional gifts publicised?</p> <p>TFCF states that no complaints were received regarding data protection issues. Were there other complaints received on e.g. aggressive fundraising practices, insufficient information flows or similar? The generic process described in case of any complaints seems rather broad without clear timelines or responsible staff identified.</p>