June 2020
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List of acronyms

- CBPR – Community Based Participatory Research
- CDD – Community Drug Distributor
- DFID – Department for International Development
- DPO – Disabled People’s Organisation
- EAP – Employee Assistance Programme
- ETE – End Term Evaluation
- EWG – Environmental Working Group
- GDPR - General Data Protection Regulation
- HLPF – High Level Political Forum
- HSS – Health System Strengthening
- IAPB – International Agency for the Prevention of Blindness
- IDA - International Disability Alliance
- IDDC - International Disability and Development Consortium
- IF – Inclusive Futures
- IW – Inclusion Works
- MDA – Mass Drug Administration
- MEL – Monitoring Evaluation and Learning Team
- MPC – Minimum Partnership Criteria
- NTD – Neglected Tropical Disease
- OECD - Organisation for Economic Co-operation and Development
- POE - Partner Organisation Effectiveness
- PRO – Programme Oversight Reporting
- QSAT – Quality Standards Assessment Tool
- SDG – Sustainable Development Goals
- SHRBP – Senior HR Business Partner
- SIM – Strategy Implementation Monitoring
- SORP - Statement of Recommended Practice
- UNDESA - United Nations Department of Economic and Social Affairs
- VIP – Valuing Individual Performance tool
- VNR - Voluntary National Review
- WHO – World Health Organisation
CEO Opening Statement

As I write this statement the world is convulsed by the Covid19 pandemic. All our office buildings are closed with staff across the world working from home. Many of our programmes have been suspended following government guidance. This pandemic will inevitably have a tumultuous effect on our work this year and will be a massive focus for management attention. We simply cannot know when programmes will restart or how countries will be affected.

Like most organisations, we focused initially on safety of staff, business continuity and engagement with partners and donors. We have invested in systems and infrastructure over the last few years so are able to conduct our business even with all offices shut. That said, we are guided by WHO and local governments in terms of what programming is permitted – and our major health programmes are suspended whilst ministries prioritise Covid. WHO has advised countries to postpone mass drug administrations and case finding which form the bedrock of our NTD programmes.

We continue to fundraise, and as at time of writing are finding our voluntary income to be remarkably resilient. This may of course start to tail off as time goes by. Our institutional donors including philanthropists are being very supportive, protecting fixed costs and in some cases looking to repurpose grants and contracts to enable us to provide support for Covid activities.

We have run a series of financial scenarios to identify whether Sightsavers is robust under various assumptions, including some pretty negative possibilities. We believe that with our reserves, our operating model and the attitude shown thus far by most donors, we should weather this storm, albeit potentially a bit battered by the end.

The report apart from this statement focuses on the reporting period to the end of 2019 and therefore makes no reference to Covid19. However, across 2020 we expect managing through the pandemic, and hopefully the start of the recovery period, will be the overriding priority for the organization. We will be working with some key stakeholders to campaign for people with disabilities, where evidence shows they are already being side lined during the pandemic. We will be working hand in glove with partners and donors to ensure we emerge from this crisis as strong as possible and able to regain momentum towards our mission when we can. We expect there to be pent up demand for eye care services and a need to intensify our work on NTDs to ensure that gains earned to date in the drive towards elimination are not lost.

We will continue with our strategy refresh work (begun late 2018), creating an overarching programme strategy and updating our thematic strategies. We will also be updating our performance scorecard (SIM) and strengthening some of our business processes. At the moment, it is not clear what the wider impact of Covid will be on health systems, economies, social protection and we may find very different ways of working (not just increased Zooming!) become necessary. One risk is that participation of beneficiaries and their representative groups (the disabled people’s organisations (DPOs)) could be negatively impacted by lockdowns and social distancing, and the lower capacity DPOs have to be able to operate remotely.

Looking back over the last year or two, the top three areas of focus have been:

a) Getting large contracts running smoothly, delivering results for beneficiaries and satisfying donor expectations. We had four very large contracts (worth almost £250m) all in their early stages – on both NTDs and disability. These were all consortium contracts involving a high degree of collaboration with a wide range of organisations. Managing such a myriad of stakeholders is not easy, but I am really pleased with how all of them have performed.

b) Our advocacy and campaigning work stepped up another gear, working ever more closely with the International Disability Alliance, which is a membership organization of DPOs across the world, making it a key
body to represent the disability movement. I was particularly pleased to see that we found innovative ways to ensure the voices of some of the poorest people with disabilities were able to be heard directly in our advocacy. We also focused on building some new consortia in our eye health work – an area where we haven’t been as successful hitherto. We had some success in both advocacy (the WHO publishing its first ever World Report on Vision last year) and in joint applications for funding (where a group of four agencies have applied together for the MacArthur Change100 prize which attracts thousands of entries, the application being currently showcased by Charity Navigator along with 20 others).

c) We began our strategy refresh work – undertaking a thorough lookback over the last decade to understand the changes and key learnings that had taken place. We also performed a horizon scan (discussing this with external players including members of the International Civil Society Centre) and opened debate on 10 key strategic questions via cross organizational working groups.

There were three areas identified as needing improvement in our last report – information on key likes/dislikes of beneficiaries, involvement of stakeholders in advocacy and feedback from country offices on complaints. We have probably made the most progress on the involvement of stakeholders in advocacy where we are working so closely with other players, particularly in disability, and have found new ways to enable the voices of beneficiaries to be heard. We rarely do advocacy on our own now. The close working relationship we have with IDA and DPOs gives us really useful insight into the likes/dislikes of the beneficiaries who they represent, but we are looking to see what more we can do around beneficiary participation in our other programmes. Section J3 of the report shows that we have undertaken some significant work around feedback on external complaints from our country offices – although the complaints we have received in the last few months have tended to focus around safeguarding or fraud particularly in partners rather than complaints about Sightsavers activities.

In summary, this is an unprecedented time for all of us. Covid19 is driving us to find new ways of working remotely, to be more innovative in our programming (to help support the Covid19 effort) and has shown how essential communication with both internal and external stakeholders really is. Maintaining the morale of our staff is a critical factor, and as CEO I have been sending weekly video messages to everyone keeping them apprised of how things are going. We will be undertaking a staff survey in June this year – we intend to go ahead with this despite Covid19, as it will give us an opportunity to understand how our staff are feeling not just about Sightsavers in normal times, but about how we are handling this global crisis.
Cluster A – What we want to achieve

A. The impact we achieve

A.1. What are a) your mission statement and b) your theory of change

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

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 actors) 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, and 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.

Thematic strategies exist for eye health, refractive error, education, social inclusion, neglected tropical diseases and research, which guide our programmatic approach to delivering programmes across these thematic areas.

A.2. What are your key indicators for success and how do you involve your stakeholders in developing them?

Sightsavers SIM card (which is published on our website and can be viewed by clicking here) remains the central tool used to track progress against our strategy through the design, implementation and evaluation of our policies and programmes. The tool highlights the data we collect to meet our strategic aims, as well as regularly updated narrative around challenges and successes.

Sightsavers ultimate aims focus on sustainability, government ownership and empowerment of people with disabilities to participate equally in society. There are four ultimate aims shown at the top of the SIM card, which link directly to our objectives on health, education and inclusion. The first two aims relate to governments ensuring eye health and education services, known as the ‘supply side’, are available to all. The third is about securing equality for people with visual impairments, and governments implementing the agreed conventions. The fourth is the ‘demand side’, covering both inclusion and health objectives, and focuses on people with disabilities being able to seek healthcare. We then take these aims and look at what we want to achieve for our beneficiaries over the strategic period, with the goal of undertaking demonstration programmes in eye health, education and social inclusion, that can be replicated and taken to scale by the duty bearers, state governments. In addition, in line with a separate but related strategic objective, we implement a range of programmes contributing to the elimination of Neglected Tropical Diseases (NTDs).

The overarching strategic aims as seen in the SIM card did, at their time of development, involve various internal and external stakeholders, as well as being based on research carried out. As we approach the refresh of these indicators it is our intention to involve beneficiaries by way of consultation with the relevant disabled people’s organisations (DPOs), themselves comprised of members with disabilities. We do however consult with beneficiaries at project level to ensure that the overarching strategy is implemented in a consultative manner. This can take the form of focus groups and the convening of project design workshops, whereupon DPOs are invited to attend and to share in project design.

As well as our SIM card tool, we have extensive internal policies and procedures which govern how we engage with our different stakeholder groups. Many of which are described in detail under relevant sections of this report and can be found by clicking here.
A.3. What progress has been achieved & difficulties encountered against these indicators over the reporting period?

Over the reporting period we have achieved some excellent results and identified some areas for improvement. Performance results against SIM indicators are published on our SIM card dashboard, comprising visual charts, data and accompanying narrative, and can be viewed on our website by clicking here.

In line with our set of indicators focused on delivering for our beneficiaries, in 2018 - 2019 we examined 16,364,038 people, performed 425,148 operations, and dispensed 456,934 pairs of spectacles. We provided training to 22,716 people with low vision and other disabilities, as well as supporting 8,500 children with disabilities in schools. Across our Neglected Tropical Disease (NTD) programmes we delivered a total of 111,377,624 treatments.

Sightsavers helped to provide 12% more cataract operations in 2018 - 2019 than in 2017 - 2018. Significant increases were seen in India, where a rising number of screenings meant more people were referred for surgery. The proportion of women receiving cataract surgery has increased following efforts to improve sensitisation within the communities. In Africa, we performed 10% fewer surgeries as the EC-funded eye health initiative in Sierra Leone wound down, along with the CATCH programme in East Africa. We are keen to obtain more funding for eye health programmes in Africa to reverse this trend.

The number of children that Sightsavers supports has increased by 11% since 2017, mainly driven by our inclusive education projects in India (which make up 75% of the total). However, in India we employ an indirect support model that focuses on broader curriculum development, teacher training and strengthening the policy environment, and not on supporting individual children to attend school. In Africa, the project approach is a mix of direct and indirect support, with individual children often given significant investment and support as part of programme activities. 2,181 children in Africa received this in 2018, including 811 children in our project in Bombali district in Sierra Leone (against a target of just 100), thanks in part to the success of community advocacy for inclusive education mainstreaming in schools.

In addition to these beneficiary level indicators we also increased our capacities and capabilities in line with our organisational strategy. In our advocacy work 96% of countries and relevant teams we work with are actively participating in international or in-country processes to influence change in policy or planning, whilst 83% of our Policy and Global Advocacy objectives have demonstrated significant progress in our annual self-assessment. In our research work 59% of projects generated new evidence through high quality research, and 73% of completed studies disseminated new evidence to external audiences.

There were however significant challenges during this period. In our NTD programmes for example, there were issues that affected our ability to distribute medication, from delays in drug delivery or their release from customs (notably in Kenya and Nigeria) to security issues (notably in Cameroon). The Kenyan issue was resolved in early February 2019, allowing programme delivery there to continue. In Nigeria, following intensive advocacy efforts, we were able to undertake planned schistosomiasis treatment, but this was severely delayed, and our capacity was diminished. One of our biggest schistosomiasis programmes is based in Nigeria, and this significantly affected the 2018 schistosomiasis figures.

A.4. Have there been significant events or changes in your organisation or your sector over the reporting period of relevance to governance and accountability?

Our new Chairman Clive Jones was appointed in August 2018. He is a senior figure within the British broadcasting industry and as an experienced chair, he now splits his time between the public and private sector, which has involved chairing the Disasters Emergencies Committee, National Theatre Wales and the Runnymede Trust.

In addition, we also appointed Prof. Tuwani Rasengane in December 2018, she is Head of Optometry at the University of the Free State in South Africa, and a senior manager of optometric services in the Free State. She represents Africa in the World Council of Optometry education committee and has a PhD in physiological optics from the University of Houston. We also welcomed to the board Louis Taylor (appointed December 2018), he is Chief Executive of UK Export Finance, the UK government’s export credit agency. He previously held senior roles in financial services (JP Morgan and Standard Chartered) and is a former Chair of Trustees of Music in Prisons, and Chair of Governors at RGS Newcastle.
Outgoing UK trustees from the UK board are Michael Chilton (stepped down July 2018); Stephen King (stepped down July 2018) and Will Gardner (stepped down October 2017).

In addition to these changes at board level we have continued to progress through a period of strategic refresh as an organisation. This began with the organisational strategic refresh process which commenced in October 2018, and has more recently moved into both the refreshment of the individual thematic strategies, those which seek to guide the implementation of the overall strategic direction as referred to in the SIM Card above, and the creation of a new Programmatic Strategy. These documents will seek to drive the broader strategic aims of Sightsavers, through the programmes we choose to implement, and importantly, the eventual design of individual projects. We hope that by reframing and refreshing these processes we can further enhance our accountability to our stakeholders by demonstrating a clear through-line from top level governance to those who we support. An important additional process to take place in 2020 is the commencement of a refresh of the SIM Card indicators, ensuring that they remain relevant and appropriate in monitoring our success and challenges as we implement our new strategic direction.

During this reporting period we have also expanded the membership of our organisational Transparency Working Group. This group meets quarterly to discuss improving initiatives for accountability, as well as strategies for disseminating information to staff and other stakeholders.

B. Positive results are sustained

B.1. What have you done to ensure sustainability of your work beyond the project cycle, as per commitment 4? Is there evidence of success?

Ensuring the sustainability of our programmes and their lasting impact in the communities we support is a core strategic aim. To us this means supporting the development and strengthening of national systems, by a process of implementing evidence-based programmes, that are both cost effective and capable of being scaled up. Key to this aim are the partnerships we form with national, regional and local governments, and Disabled People’s Organisations (DPOs). We aim to increase the capacity of all our partners to deliver sustainable programmes through offering training and infrastructure development where needs are identified.

Our partnership framework sets out our key principles for working with partners (see annex 1 to this report). These principles are central to ensuring the sustainability of collectively achieved results. Throughout the project design, implementation, and monitoring, we learn from successes and challenges as well as how achievements will be sustained once the funding period has ended. Through this process, sustainability and exit are core components of the design of each and every project.

In 2019, in our NTD work, we captured our approach to learning by developing the Learning manual: collaborate, learn, and adapt in the NTD programme cycle. This document provides a formal structure to our learning approach and encourages our programmes to be adaptive and collaborative with other partners in response to an everchanging landscape.

Through this approach we have learned that improving national NTD information systems and mainstreaming NTD data into the national health information system and logistic information system are critical components to ensure the sustainability of our work. For example, many of the programmes use mass drug administration (MDA), in which entire populations are treated with medication. These MDAs take place within local communities, making it difficult to monitor treatment and distribution. In 2019, with support through the Sightsavers led Accelerate project and Zimbabwe’s Health Information and Surveillance Unit we designed a monitoring platform which uses mobile phones and district health information system (DHIS2) software to collect data during the MDA. This has significantly improved the quality and timeliness of data, as well as our ability to supervise the activities, and means far fewer drugs are wasted. The Ministry of Health’s quick uptake of – and commitment to - the DHIS2 platform was significant. The concepts were picked up so well that in 2020 Sightsavers will be able to support MDA monitoring activities virtually with no in-person visit required. The national health information and surveillance unit has even began setting up the system to use for other MDAs and malaria work.

In addition to our work on NTDs, our education portfolio involves people and partners to identify where our programmes can add value and strengthen those systems that are already in place.

In Malawi, Programme staff engaged in continual dialogue with stakeholders at all levels of education systems during our programme’s implementation. This produced valuable learning, enabling modification and even
significant changes of direction to programmes, known as adaptive programming. This informed our decision to incorporate a livelihoods component in our early childhood project, by which communities can sell the produce they generate to support activities beyond our project cycle. For example, this will enable children attending community-based childhood care centres to be provided with a mid-day meal.

In 2019 we assisted the Ministry of Education in Uganda to incorporate inclusive education perspectives in the pre-service curriculum delivered in teacher-training colleges across the country. We also assisted the Ministry of Education in Senegal to provide in-service training in inclusive education for practising teachers and are working with the government in Sierra Leone to integrate similar, inclusive approaches into teacher training.

During the reporting period we continued to work to improve our evidence-base to demonstrate that partners have the increased capacity to sustain programme activities. During 2018-2019, our programme systems and monitoring team, and NTD Department, updated our quality standards, associated tools, guidance and support materials to better reflect key components in the disease elimination process and build the capacity of our partners.

In 2018-2019, 25 QSATs (Sightsavers’ quality assessment evaluations) were undertaken in Democratic Republic of the Congo (DRC), Guinea Bissau and multiple states of Nigeria. From these evaluations several actions were completed, including, the refurbishment of drug storage facilities in Ituri state (DRC), the increased production of support materials in Kebbi (Nigeria), and improved treatment coverage through inclusion of private schools in treatment campaigns in Kwara state (Nigeria). Each of these measures will contribute to a lasting positive effect on the quality of services received by beneficiaries long after our interventions have ended.

An important tool in measuring our lasting effects in those communities where we have worked are Impact Evaluations. By collecting various data at the beginning, throughout, and after our projects, we are able to see how our projects instil lasting benefits in those communities. For example in 2019, we evaluated the impact of our five year eye health strengthening project in the Indian Sundarbans, a remote area of 102 islands in West Bengal, where more than 40 per cent of the population live below the poverty line. Funded by Standard Chartered Bank, the project overhauled the region’s eye care helping to create 17 eye health centres and screening more than 450,000 children and over 400,000 adults for eye problems. The project supported 32,000 life-changing cataract operations and provided over 13,000 pairs of glasses. Results of our impact evaluation research show that in the project period, the prevalence of blindness among people aged 50 years and above reduced by half from 2.4% to 1.3%. It means that before the project started, one in every 40 people over the age of 50 in the area was blind. By the end of the project, that number has dropped to one in 80. In 2019, our work in the Indian Sunderbans was independently assessed by US charity evaluator ImpactMatters, who rates non-for-profit organisations on the impact they make on people’s life. We were awarded with the maximum five out of five stars and rated number one top health charity on the impact we achieved in the Sunderbans.

B.2. What lessons have been learned in this period? How have these lessons been transparently shared among internal and external stakeholders? How do you plan to use these lessons to improve your work in the future?

We continue to learn from our successes and failures using various approaches such as, learning reviews, evaluations, research and learning seminars and specific learning events held globally or in our regions. We also implement appropriate approaches in line with our quality standards on learning. In 2019 our monitoring and evaluations teams were merged, with the learning function added to their remit to enhance organisational learning.

One of the primary functions of this team continues to be commissioning and conducting evaluations, which are a systematic, impartial and objective assessment of our projects, in order to generate insightful, credible information and learning that can be used to inform decision-making and future planning. We then report and communicate these results and achievements, evaluations are published to IATI and on our website (available by clicking here).

In 2018-2019, nine independent end of term evaluations were conducted using the traffic light rating system to assess performance against the Organisation for Economic Co-operation and Development's Development Assistance Committee criteria. During this period, we also conducted a further 12 evaluative exercises that were outside of the OECD/DAC evaluation criteria. These included mid-term and learning reviews, theory of change and review workshops, most of which were not specific donor requirements but were identified as adding value to our learning and evidence base. The type of activity was defined at the Terms of Reference (ToR) stage of each exercise, to ensure that the evaluation/review elicited learning in the most effective way. Part of the reason for conducting internal evaluative exercises is to add value by providing an opportunity for programme staff and other
stakeholders to engage with the analysis, conclusions and recommendations in a collaborative and participatory manner. This level of engagement increases ownership and supports the uptake and sharing of learning across the organisation.

In the reporting period we conducted two End-Term Evaluations (ETEs) for Neglected Tropical Disease programmes: our DFID Supported Integrated NTDs Control Programme in Northern Nigeria (UNITED); and UK Aid Match Onchocerciasis/ Lymphatic Filariasis programme in DRC, Guinea Bissau, Nigeria and Uganda, and also an Evaluative Learning Exercise for two trachoma elimination programmes (DFID Trachoma SAFE Implementation; and Elimination of blinding trachoma in the Commonwealth). A Learning Paper was produced alongside the main report for all three of these evaluative exercises to highlight and elucidate the key lessons learnt (which can be viewed here).

An increasingly important part of monitoring has been how we disaggregate the data we collect to identify the prevalence and types of disability present amongst those people our programmes support. An essential part of this work has been providing training, for example to staff and data clerks before data collection in Bangladesh, Pakistan and Mozambique. This training included sensitisation on disability, training in the Washington Group questions and ethical data collection. For some who participated it was the first time they had considered that a person with a disability should not be limited but is entitled to participate fully in society.

Learnings from disability data disaggregation have been shared internally with project staff and partners and are informing good practice as we broaden disability data collection in other projects and areas such as Education and Social Inclusion. Learnings have also been shared with donors and other organisations across the sector.

Alongside the learnings taken from monitoring and evaluations of our programmes, we also continued to expand our research team, adding further expertise in geo-mapping, and statistical data. In addition, we recruited two Evidence and Learning Uptake Advisors, helping us to develop innovative ways to utilise research learning in programmes and better communicate these learnings internally and externally. Currently this is involving the creation of an internal research learning platform which will facilitate easy access to, and sharing of, our research reports and findings.

Our work has also been shared externally, most recently we co-hosted the 3rd International Conference on Disability and Development with the London School of Hygiene and Tropical Medicine, and the International Centre for Evidence in Disability. This two-day conference gave the us the opportunity to share with the academic community and other international organisations, our research findings on a range of topics related to disability and development. Amongst these were presentations on Community Based Participatory Research, and our work in identifying gaps in the academic evidence available in fields related to eye health, through our Evidence Gap Maps (which can be viewed on our website here). In conjunction with this event, a one-day internal symposium was also hosted for Sightsavers staff.

C. We lead by example

C.1. How does your organisation demonstrate excellence on your strategic priorities?

The aim of all Sightsavers’ projects is to directly contribute to our four change themes, set out in our SIM Card, that governments ensure quality eye care is universally available, that all children with disabilities receive a quality education, that people with disabilities are empowered to be equal members of society and their governments implement the relevant international conventions, and that people with disabilities will actively seek eye care services. To monitor our progress towards the organisation strategy, our SIM Card tool breaks down each objective further into a set of measurable indicators. This tool, which is openly available on our website, provides an open channel for our stakeholders to view our data, scrutinise our performance and ultimately to hold us accountable.

A key eye health indicator is the “percentage of countries where Sightsavers has an eye health project, that has contributed to identification of gaps/needs through a prevalence survey in the last 10 years”. Against this measure we have achieved 85%, against a target of 80%. This has been key in demonstrating that our eye health programmes have a solid evidence base.

A key indicator relating to social inclusion is “percentage of countries (where we run social inclusion and/or education projects) that can demonstrate effective inclusion and empowerment of people with disabilities”. As of the final quarter of 2019 this stood at 90% against a target of 80%. These results show encouraging year on year
improvement in the quality of our own programmes, throughout the planning and implementation cycle. As these are social inclusion focused programmes, we would expect to reach 100% in this indicator in a short time period.

Likewise, with our education work we have achieved 100% against a target of 85% for countries where we implement education projects that are suitable for replication/adoption by government or other service providers.

Whilst we can see excellent performance in certain areas of our portfolio, we can use the SIM Card tool to also see where more work needs to be done. A core cross-cutting objective as an organisation is to improve access to services for women. In our health portfolio we have seen that 46% of our health projects reach more females than males, against a target of 51%. Such information points to a myriad of cultural, political and financial barriers relevant to the differing contexts in which we work. This information allows us to consider adaptations to programme design in the future to close this gap.

Our Annual Report (available here) highlights those partners that have been key to our work, and progress toward strategic priorities, throughout this period, including the WHO, IAPB, as well as fellow INGOs and NGOs. As referenced in other areas of this report, numerous members of our staff are also members of related organisations and initiatives, and Sightsavers’ expertise has seen it invited to co-host events including research symposiums and international conferences.

C.2. What evidence is there that your expertise is recognised and welcomed by your peers, partners and other stakeholders?

During the reporting period Sightsavers continued to be recognised by its peers and stakeholders. Currently we are leading the Inclusive Futures (IF) programmes comprised of 17 international disability-focused organisations. Together we are setting-up and supporting innovative inclusive education projects in seven countries (Nigeria, Kenya, Uganda, Tanzania, Jordan, Bangladesh, Nepal). Through participation in IF, the various member organisations are sharing learning and generating knowledge.

In our education work we recently won a Zero Project Award for innovative practice, in our early childhood development and education project in Malawi. This project strongly emphasises community participation. It also has focused on assisting the umbrella organisation of people with disabilities (FEDOMA) in Malawi to advocate at national, district and community levels for disability-inclusive early childhood development and education.

In this reporting period we were also commissioned by UNESCO to produce a report on the education of children with visual impairments in sub-Saharan Africa. Our analysis, including case-studies and focus group discussions with leading disability activists across the region, enabled us to identify the barriers that are at present preventing children with visual impairments in sub-Saharan Africa accessing education and to identify strategies for overcoming these barriers.

In our NTD work, as part of the Ascend West and Central Africa programme, Sightsavers is working with consortia partners and partners from the USAID supported ‘Act to End NTDs’ project, to further tailor health systems strengthening activities and support national governments. One of the key learnings from regional health system strengthening (HSS) workshops supported by the programme was that countries value these kinds of forums to share details of how their national NTD programmes are structured and positioned within wider Government.

Sightsavers continues to be invited to bring its technical expertise to a range of projects and initiatives. As part of a bid to offer mental health support in Ghana we are bringing our knowledge of disability inclusion to a wider consortium. Whilst in Sierra Leone we have been invited by our government partners to input technical expertise into both national health, and education planning. Additionally, many of our staff are also members of other organisations and international bodies, bringing their experience to a range of wider initiatives, including membership of the International Agency for the Prevention of Blindness (IAPB), The College of Ophthalmology of Eastern Central and Southern Africa, and the United Nations Committee on the Rights of Persons with Disabilities.

In addition to the memberships highlighted above, we also seek feedback on our activities from our peers and consortium partners. In our Inclusion Works project, we ensure we survey consortium members every six months to gather feedback on our performance as consortium lead and to gather ideas for improvement and change.

C.3. How does your organisation practice being inclusive and protecting human rights, including promoting women’s rights and gender equality, in accordance with commitments 1-2?

Commitment 1: Justice and equality
Sightsavers established a programmatic partnership with the International Disability Alliance (IDA) in 2017 which resulted in the awarding of two large consortium programmes funded by DFID. Under the ‘Inclusive Futures’ brand, the two programmes have been co-designed/co-produced with women and men with disabilities and with their representative organisations at global, regional, national and local levels. In a more focused way than before, we and our partners have been able to deepen our knowledge, understanding and implementation in inclusive practices as well as challenge ourselves to do better. IDA, and its members, including Inclusion International which represents people with intellectual disabilities and Down Syndrome International, have all provided support and guidance.

Safeguarding is another area that Sightsavers has scaled up over the reporting period. Within the organisation we have a new safeguarding team and expert consultants to develop and support safeguarding tools, roll out and processes, with the ultimate aim of doing no harm and ensuring that people most at risk are protected in programme activities. A member of Sightsavers staff, also sits on DFID’s Independent Reference Group, providing expert advice on disability inclusive safeguarding. We are also a programme partner in a DFID-funded Regional Support Hub for Safeguarding, in a consortium that includes Social Development Direct and Options. Our role is to ensure that disability is included into every aspect of the ‘Hub’ – and that where gaps exist – for example, specific tools and guidance, we are able to develop them. Not only does this enable us to support disability inclusive development, but the benefits to the organisation are that we are also able to strengthen our own internal mechanisms through exposure and learning from other organisations in the wider sector.

Sightsavers, like other members of the International Disability and Development Consortium (IDDC), have committed funding to the “Bridge CRPD-SDGs Training Initiative”. The objective is to invest in global and regional representative organisations of persons with disabilities to support capacity building of their national members to advocate for the achievement of the Sustainable Development Goals (SDGs) for all persons with disabilities in line with the CRPD. Since October 2015 and December 2019, 770 people from 103 countries were reached and of the 336 participants 51% were women with disabilities, and 41% from underrepresented groups).

Core to our social inclusion strategy is the importance of organisational diversity. We cannot champion disability rights without practising inclusive recruitment, increasing retention and challenging negative stereotyping of disability. In early 2020, our Social Inclusion Working Group - an initiative that champions disability in the workplace - was shortlisted for the BOND Diversity Awards. We also successfully graduated from the UK’s Disability Confident Level 2 to the highest Level 3 as a of disability confident employer and leader. This was not only a huge achievement but will be leveraged to encourage more people with disabilities to apply to work within Sightsavers.

**Commitment 2: Women’s rights and gender equality**

We remain committed to promoting women’s rights broadly, and in terms of ensuring women are equitably accessing eye health and neglected tropical disease (NTD) treatments. We are also particularly concerned about the barriers women with disabilities face in order to access our social inclusion programmes and are putting in place a range of mechanisms that aim to draw attention to this and focus on how to respond to this challenge.

One example is the Gender Action Plan that was developed as part of the DFID-funded “Inclusion Works” (IW) programme. This tool includes a range of strategies that can be applied in the IW programme. For example, one proposal is a resource group of gender experts which will become operational shortly. In addition, we recruited a new staff member who has expertise in gender, including gender-based violence. Their skills will be utilised in this programme as well as other programmes to support country offices, so they can prioritise equitable programming. In West Africa, Irish Aid funded a bilingual (French and English) “Training of Trainers on gender” workshop for 40 staff from eight countries from West and Central Africa. Subsequently a toolkit has been developed, which will be used to cascade the learning to staff and partners in other countries.

In 2019, we also commissioned a Synthesis Review of Sightsavers’ work to promote gender equality as a cross-cutting theme throughout its programmes. This review curated evidence on key programmatic achievements and challenges on gender inclusion from recent evaluations. The review also provided a broader aim of understanding how and to what extent Sightsavers’ work contributes to improvements in women’s lives. In addition, the review assessed to what extent the evaluations themselves used a gender lens. We will be using the report of the review as a tool for influencing our strategy refresh process to ensure that we can increase the mainstreaming of gender in future.
Sightsavers is committed to promoting the rights of people with disabilities and ensuring our representatives and programmes “do no harm.” We have a comprehensive safeguarding policy, which is available on our website, our intranet, our safeguarding online training module, and is shared with all partners during the contracting stage. Online safeguarding training is compulsory for all staff and trustees and we are in the process of conducting face-to-face training with all our staff, staff in implementing country offices received this training as a priority and the majority were trained in 2019.

Sightsavers requires all representatives to sign a Code of Conduct, as a condition of their contract and all partners are asked to sign a separate Code of Conduct as a condition of partnership financial agreements or contracts.

All members of the Sightsavers leadership have safeguarding embedded in their job descriptions. In addition, a safeguarding action plan is maintained and updated by the Safeguarding Manager on an annual basis. The CEO at Sightsavers manages an organisational Risk Register, which includes safeguarding, and this is formally reviewed by the Board and Audit Committee on a regular basis. A central Safeguarding Risk Register is managed by the Safeguarding Manager appointed in 2017, while Designated Safeguarding Leads cover all our implementing countries and each project creates its own country specific risk register. We log all concerns in a “safeguarding concern log” and reflect any lessons learnt in our global safeguarding risk register. Safeguarding is also reflected in the risk registers for all new programmes as of 2019. One of the trustees, an HR professional) is designated as a Safeguarding Trustee and there is a whistleblowing line which goes directly to him. He meets regularly with the safeguarding team.

The Designated Safeguarding Leads are responsible for ensuring all our representatives meet our minimum safeguarding standards and escalate any “serious concerns” to the safeguarding team at Sightsavers. Sightsavers runs safeguarding training with all partners using a range of training materials, which were developed in response to requests from partners in 2018. The most commonly used tool is guidance on “how to strengthen or develop a safeguarding policy,” which partners can use before sharing their policy with our safeguarding team for a final review.

Prior to any partnerships being undertaken we conduct a Minimum Partnership Criteria (MPC) Assessment, which requires partners to have a safeguarding policy in place or commit to developing one. This is an important approach for Sightsavers as we do not implement our own programmes, but instead depend on partnerships in the implementing countries to do so. Depending on the degree to which a partner will be involved, for example if they will be allocated funds directly, we may follow the MPC Assessment with a Due Diligence Assessment, containing 13 safeguarding criteria which partners must meet in a specified timeframe and according to an agreed action plan.

In February 2020 Sightsavers launched a safeguarding video for external audiences, to provide our staff with an extra training tool. We have also been reviewed by Keeping Children Safe and the Charity Commission in the past 18 months and received positive feedback from each of these reviews.

Key to ensuring that we do no harm as an organisation is the formalisation of conduct in a range of policies. These are reviewed and updated every three years and are available to all staff via our intranet or available on our website by clicking here. In addition, a comprehensive eLearning programme has been developed that all employees complete as part of their induction, or when new or updated policies are developed.

Our Modern Slavery policy shows a commitment to improving practices to combat slavery and human trafficking. We have a zero-tolerance approach to modern slavery within our operations and strive to act ethically and with integrity to ensure modern slavery is not taking place in any part of our organisation. In 2019 Sightsavers performed a risk assessment of its supply chain and programmatic activities. This focused on the risk by geographic region, sector and group, further broken down by the risk with our implementing partners and suppliers. This formed part of the initiation phase of a wide body of work designed to further strengthen measures to combat modern slavery and human trafficking.

Overall, the risk was determined to be low, though some aspects of the risk assessment, such as geographic risk, posed a higher likelihood of modern slavery. We acknowledge the serious and deep impact that modern slavery has, and while the overall risk is low, the impact is treated as high. As a result, Sightsavers has developed a series of mitigation activities which will be implemented throughout 2020 and into 2021. These include the
development of enhanced training for staff and partners working directly with our supply chain and additional due diligence and audits, both at global and community levels. Our Slavery and Human Trafficking statement is updated annually with the next statement due April 2020, in accordance with the Modern Slavery Act 2015.

Sightsavers Anti-Fraud and Corruption Policy was reviewed and updated in September 2018. In support of our zero-tolerance of all forms of fraud and corruption, a mandatory e-learning training package has been developed and distribute to all global staff. This raises awareness of the signs of fraud and Sightsavers policy and zero-tolerance position.

Sightsavers manages its risk around fraud with a diverse set of mitigation strategies, which are embedded at a policy and process level across the organisation. Sightsavers updated its Financial Framework in 2019 with further iterative improvements on its financial controls, designed to combat fraud. The risk of fraud is captured on the organisational risk register, which are reviewed annually by Council and the Audit Committee.

Sightsavers Global Whistleblowing Policy is published for staff on our internal Policy Library and on the Sightsavers’ website. The policy, which is supported and promoted by management serves to protect staff who make disclosures about misconduct, malpractice and unethical or illegal activities from being penalised. All global staff are required to complete a mandatory e-learning pack which serves to further raise awareness of the policy and the whistleblowing procedures.

The reporting channels defined in the Global Whistleblowing Policy are complimented by processes in the Global Complaints Policy, which is also available on our website. Complaints that are received, both internally and externally continue to inform our internal audit programme.

In 2019 Sightsavers conducted an extensive audit of our complaint policy, handling and management. The scope of this audit included all aspects of global complaint handling. The audit found that the management of complaints across the organisation was sound. While there was no indication that there had been any mishandling of complaints, it noted areas for further strengthening. Many of these have been adopted, with further activities being implemented throughout 2020.

Sightsavers requires all programmatic suppliers to sign Sightsavers’ code of conduct. In 2019, work started to update and consolidate the codes of conduct for suppliers and partners, raising the expected standard of conduct and linking in with developments across the organisation in compliance, conduct and safeguarding. The updated code is expected to be delivered to required organisations later in 2020.

C.5. How do you demonstrate responsible stewardship for the environment?

We continue to monitor activities which have a negative effect on the environment and assess the ways in which we can minimise this negative impact.

Energy: Electricity - The table below relates to the UK head office location only. All conversions to CO2 (tonnes) are reported based on information provided by our energy provider or management company at the time.

<table>
<thead>
<tr>
<th>Electricity – UK only</th>
<th>2019</th>
<th>2018</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>KWH</td>
<td>CO2</td>
<td>KWH</td>
<td>CO2</td>
</tr>
<tr>
<td>Gas</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Electricity</td>
<td>162.32</td>
<td>114.77</td>
<td>155.16</td>
</tr>
<tr>
<td>Total</td>
<td>162.32</td>
<td>114.77</td>
<td>155.16</td>
</tr>
</tbody>
</table>

Paper consumption and recycling - Printers at our UK head office capture usage and enable us to report the environmental impact of our in-house printing, scanning and photocopying. The software requires staff to use a programmed pass in order to release any print jobs, ensuring paper is not wasted. In addition, our default print settings are set for duplex, grey scale printing to further reduce the number of sheets and energy used.

<table>
<thead>
<tr>
<th>Paper Consumption</th>
<th>Measure</th>
<th>2019</th>
<th>2018</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Impact</td>
<td>240,809</td>
<td>251,917</td>
<td>245,609</td>
<td></td>
</tr>
<tr>
<td>Trees Consumed</td>
<td>Trees</td>
<td>3.05</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------</td>
<td>-------</td>
<td>------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Equivalent Bulb Hours</td>
<td>Hours</td>
<td>69,589.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total CO2 Produced</td>
<td>Tons</td>
<td>1.105</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Flights and CO2** – Since 2016, as seen shown in the table below, we have seen a year on year increase in the number of flights taken, with an upward trend seen since 2014. Sightsavers programme activities have seen sustained growth, particularly since 2017 with large new NTD projects such as UNITED to combat NTDs and ASCEND, coming online, as well as our leading role on new consortia such as Disability Inclusive Development (DID) and Inclusion Works (IW). This has necessitated the employment of new personnel and concurrently has increased air travel associated with such project activities.

<table>
<thead>
<tr>
<th>Flights</th>
<th>CO2 (Tons)</th>
<th>2019</th>
<th>2018</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Journey Type</td>
<td>CO2</td>
<td>%</td>
<td>CO2</td>
<td>%</td>
</tr>
<tr>
<td>Short haul (Europe)</td>
<td>94.96</td>
<td>3.9</td>
<td>94.08</td>
<td>4.3</td>
</tr>
<tr>
<td>Short haul (other)</td>
<td>525.03</td>
<td>21.3</td>
<td>757.6</td>
<td>34.5</td>
</tr>
<tr>
<td>Total Short Haul</td>
<td>619.99</td>
<td>25.2</td>
<td>851.66</td>
<td>38.8</td>
</tr>
<tr>
<td>Long Haul</td>
<td>1840.96</td>
<td>74.8</td>
<td>1343.97</td>
<td>61.2</td>
</tr>
<tr>
<td>Total</td>
<td>2,460.95</td>
<td>100</td>
<td>2,195.62</td>
<td>100</td>
</tr>
</tbody>
</table>

**Procurement**

Sightsavers has programmes in most countries in Africa, as well as in India, Pakistan and Bangladesh. We centralise a significant share of our procurement of the goods required to implement our programmes, so we can secure preferential price and benefit from economies of scale. We therefore manage shipments all over the world and work closely with major global freight forwarders to make sure our staff and partners receive the pharmaceuticals, consumables and equipment they need to run our programmes in optimal conditions and ensuring our end beneficiaries are safe. All our approved logistics partners have an environmental approach that is in line with our own, and we all aim to reduce the impact of our logistics on our environment. We are in the process of contracting with a preferred freight forwarder and will be in a position to receive emission reports so that we can monitor our impact on the environment and see how we can improve ourselves. In addition, in early 2020, we launched a new supply-chain system which will enable us to consolidate needs for each of our country programme and minimize the orders placed for each destination so that we can reduce our number of shipments and therefore our impact on the environment.

**Environmental Policy**

The Sightsavers Environmental Policy is currently under review following the strategic decision to place environmental management within the Resilience Team. The new policy, due for completion by Q2 2020 will encompass a national level focus for environmental management through the development of country environmental plans, specific to Sightsavers operating countries. These plans will be placed under an overarching framework which sets the organisational environmental principles and controls environmental management systems for areas such as supply chain, travel and environmental risk assessment. Implemented by a network of country ‘environmental champions’ and overseen by the Controller of Crisis and Risk, the new policy will be positioned to capture Sightsavers’ reporting, impact and environment safeguarding responsibilities.

**Environmental Working Group**

As our organisation has grown, so has our impact on the environment. The Environmental Working Group (EWG) has been active at Sightsavers since October 2019 and was formed because several staff expressed concern about what the organisation is doing to reduce its overall environmental footprint and increase the environmental resilience of its programming. Inspired by the success of other working groups in effecting organisational change, its members sent out an initial survey to staff at our headquarters in Haywards Heath, seeking to gauge interest in environmental issues. The group now has members from across the headquarters at varying levels of seniority and is working to expand its membership to all offices. The EWG is currently working towards the following...
objectives: greener building management, sustainable travel, encouraging knowledge and learning on the environmental impacts of our work, and collaborating with other organisations with similar interests.

In the short time the EWG has been active, it has had several successes. At our head office, ways to reduce waste are being explored and schemes to recycle milk tops, packaging, and adding an induction for new starters on how to reduce office energy consumption, have been implemented. The group have also begun work across the wider organisation, including reviewing travel policies to understand how to encourage more sustainable travel, and exploring sustainable marketing options. Finally, the group are supporting preliminary work on writing an organisational environmental policy and country environmental management plans to complement other ways of working across the organisation, upon which we will be seeking input from country office staff to help create and implement these guidelines in an inclusive way.

Cluster B – Our approach to change

D. Key stakeholders are identified with great care

D.1. Please list your key stakeholders. What process do you use to identify them?

Sightsavers has a broad and varied set of key stakeholders. These include: communities and individuals in Africa and South Asia who are reached by our eye health, NTDS, education, livelihoods and inclusion programmes, as well as local partners such as Ministries and government institutions, local NGOs and Disabled People’s Organisations (DPOs), who are responsible for implementing project activities on the ground. We also work with a large number of UK and international partners, such as INGOs, research and academic institutions, with whom we collaborate at a strategic level, on consortium programmes and on research, policy, advocacy and campaigning initiatives. We engage with a wide range of donors in a variety of countries, to fund our work, including governments, international institutions (such as the EC), companies, trusts, foundations and individuals.

We use a range of different tools and processes to identify different types of stakeholders:

Beneficiaries and communities

Beneficiary involvement in project design begins at context analysis and concept stage, where key stakeholders are mapped and engagement begins. In accordance with the thematic strategies, projects align with national government plans (where available) and a crucial stage of context analysis is scoping out the policy context in order to develop advocacy objectives, linked to the thematic theories of change. Means of verification within the Project Cycle Management and Thematic Quality Standards Assessment Tools require representative stakeholders, including beneficiaries, to be invited to participate in project design. Strategic review and decision making on the direction of the portfolio is managed by the Reflection, Oversight, Analysis and Review (ROAR) group. The purpose of this group, which meets quarterly is to review and analyse the multiple sources of evidence generated by our programmes and use these to assess progress against implementation of the thematic (eye health, social inclusion, education) and technical (e.g. research, influencing) programme strategies and agree the shape of the future programme portfolio. The group will use a variety of data sources (QSATs, SIM data, research articles, evaluations, output statistics, annual reports) to undertake this assessment.

Local partners

Our Programme Partnership Policy and Framework guide Sightsavers’ approach to partnership. It is designed to mirror and align with the project lifecycle, outlining key activities to undertake at each stage of the cycle, and the framework and associated tools ensure that appropriate implementing partners are selected. Our Programme Partnership Policy sets out the principles behind our approach to partnership and how these are operated in practice. The 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. We have a two-stage due diligence process that ensures we do not enter in a partnership relationship with organisations that are unsuitable, inappropriate, or that are not capable of delivering. Firstly, a desk review against our set of Minimum Partnership Criteria (MPC) that checks basics such as registration status, latest audited accounts, terrorism and security watchlists and any evidence of fraudulent/illegal/exploitative activity. All organisations due to be linked to our projects – even if just in a strategic/advisory capacity – must undergo this review. Secondly, any organisation due to implement project activities and/or receive funds from Sightsavers must undergo a full due diligence and safeguarding assessment, which is an in-depth, face-to-face review of their capacities, structure, resources and
track record. Any shortcomings revealed are addressed in an Action Plan for improvement that is embedded within the assessment template and is tracked and monitored throughout the project lifecycle.

In addition, a situational analysis is conducted during the project design process which allows us to identify key stakeholders at the national level which need to be prioritised for engagement during project design and implementation.

**UK-based and international collaborators**

Sightsavers increasingly seeks to offer its expertise as part of wider consortium bids involving other UK based and international collaborators. Our work on both the Disability Inclusive Development (DID) and Inclusion Works (IW) consortia, demonstrate this approach, as do our large scale NTD programmes ASCEND and Accelerate.

In addition, objective one of our Research Strategy outlines our approach to working with other INGOs and research organisations to consolidate and improve access to available sources of information. Our research team contribute to wider discourse on issues of importance to our organisation, for example the paper we recently had published in the journal of Childcare, Health and Development, on our work on early childhood development in Malawi. In line with our strategy of collaboration, we recently co-hosted an international research symposium in November 2019 as part of our continued collaboration with the London School of Hygiene and Tropical Medicine.

**Donors**

Our institutional finance team identify those donors and funding calls which are appropriate and relevant to our remit and expertise as an eye health, NTD, and disability inclusion focused organisation. Our Global Fundraising and Donations Acceptance policy outlines the conditions we apply in decisions around when we refuse to acquire funds from a donor and can be found in annex 2 of this report.

**D.2. How do you ensure you reach out to those who are impacted or concerned by your work?**

Our evaluations and research regularly seek and analyse partner and final beneficiaries’ feedback in order to learn about the impact and effectiveness of our work, and to learn more about particular contexts and particular groups who are affected or implicated.

The core model by which we implement our NTD programmes is that of a community-directed approach. In this approach the community where we work selects its own community drug distributor (CDD) from amongst its members. Sightsavers was one of the key NGOs to first promote this method of treatment and still supports the training of over 269,000 community directed distributors a year. The instrumental role that Sightsavers had in developing, piloting and then taking this approach to scale has been outlined in an academic paper that can be found here. Using this method Sightsavers supported over 142 million treatments for NTDs in 2019. The support we offered to the community included both training and retraining of distribution personnel, this process building on the feedback we had gathered from the CDDs on the treatment cycle and ways to improve future delivery. In addition, as part of this community approach we ask the community to decide on the most appropriate drug delivery method for their context, this may be from a central point in the community or carried out house to house.

In our education programmes, we continue to refine our measurement approach. Community Based Participatory Research (CBPR) is an approach that requires respectful collaboration with communities. Members of the community are involved in planning, gathering evidence, analysis and sharing what is found. Community members are shared decision-makers within the approach. The research is designed to break down social injustice and helps everyone to rethink power structures and issues. This approach has been built into four Inclusive Education projects. In 2018 -19 the Monitoring Evaluation and Learning (MEL) team shadowed the research team to learn how this approach could be used in our monitoring work. This involved three collaborative exercises, two in Sierra Leone and one in Cameroon. As part of the CBPR research, community members and teachers are identified and trained as ‘peer researchers’. These peer researchers then conduct group interviews with teachers, parents of children with disabilities and children with disabilities themselves. This approach allows the evaluations to reach the people impacted by our work and to understand their experiences of the project. These experiences are written up in a report and shared back with the peer researchers for validation.

Another participatory MEL process is being developed under the National Lottery Community Fund project - Livelihoods for youth with disabilities in Uganda – where we are piloting a participatory measure of empowerment, which is developed in collaboration with youth with disabilities, who are project participants.
The pilot showed that in-depth story collection and facilitated self-analysis was possible for a vulnerable population of youth with mixed severity and types of impairment. The pilot revealed how further adjustments could be made to ensure the approach is inclusive for all. The approach ensured youth with disabilities were able to share and analyse their stories, making them participants in the measurement process rather than subjects. Going forward, the approach will be finalised and disseminated in 2020 and additional opportunities to use the framework approach will be identified.

In 2019, our MEL team also reviewed their ethical position and produced a guidance note to support the newly formed team as they develop their practice in participatory methods. Ethical data collection, including safeguarding, is a core aspect of the MEL teams work. Feedback and dissemination of findings to project participants has been identified as an area that needs strengthening and the team will be ensuring this is part of their strategy for 2020 onwards.

D.3. How, specifically, do you maximise coordination with others operating in the same sectoral and geographic space with special reference to national and local actors?

It is important that our work maximises opportunities for collaboration and sharing of knowledge, appreciating that one organisation alone cannot possess all of the relevant expertise and local contextual understanding. As referred to in D.1. above, we use a range of processes to identify these other actors who can bring this knowledge to our programmes, some specific examples of how we are doing this currently are given below. Our approach to partnership working is outlined in the policy available on our website.

Neglected Tropical Diseases

Mass Drug Administration (MDA) continues to be key to our NTD programmes, requiring a high level of coordination with numerous partners, including drug companies, donation programmes (who manufacture the drugs to order and then arrange delivery – by air or ship- to the central medical stores), and those government actors such as the central ministry and district ministries of health, who arrange delivery of the drugs to districts. In many cases these drugs are then collected by the CDD to take to their communities for distribution. The MDA is monitored by Sightsavers staff along with the district health authorities, with unused drugs being returned to the districts, in a process known as reverse supply chain. Prior to the MDA, health sensitization programmes are given in person (often with the CDD assisting) and mass media campaigns usually by radio or by the town crier are carried out.

Indicative of this coordinated approach was the 5 year UK DFID funded SAFE Trachoma Control project which ended in 2019. This programme, endorsed by the World Health Organization as a way to control trachoma, the world’s leading infectious cause of blindness, took a four pronged approach to tackling the disease, including MDA enlisting the type of coordination partnerships referred to above. In addition to coordinating with those local partners we also implemented the project on behalf of the International Coalition for Trachoma Control, a coalition of over 30 charities and NGOs, this again necessitating an approach that maximised both expertise and resources. As of the end of this project in 2019 more than 112,000 people had received sight-saving surgery and 18.5 million were given antibiotic treatments.

Inclusive Futures programmes

Sightsavers engages with partners at both the global and local level through its leadership of the UK Aid funded Inclusive Futures consortia programmes. Each programme has eleven partners combining expertise in a variety of areas, from those who provide services for people with disabilities to those representing their interests through advocacy. Partners are involved in all aspects of project design, implementation, and monitoring.

Both programmes have governance mechanisms in place to ensure country, project and cross thematic coordination is reviewed, to ensure we maximise collaboration and learning. Inclusion Works has a multi-tiered governance structure, from local to global level, aimed at maximising the expertise of each partner across countries. Country-level programmes are led by Country Implementation Groups, which are headed by one consortium partner and include membership from other local implementing partners and Disabled Peoples Organisations (DPOs).

Both programmes engage with local actors through co-design and implementation with local DPOs, facilitated by a strong collaboration the International Disability Alliance (IDA), the global DPO umbrella body. Working with local DPOs helps ensure that programmes complement the work of each implementing country’s disability movement. For example, both programmes held country design workshops, which included local and global consortia
Advocacy

From Sightsavers policy and advocacy perspective we have developed strong partnerships with strategic donors, multilateral organisations and international finance institutions (such as the WHO, UN Women, the World Bank and UN DESA) and other critical decision makers that enable us to secure our policy influence and input into a significant range of UN-led, government and civil society processes, consultations and negotiations. Working through and with strategic partners is the most effective way to deliver policy change and we are members of a range of stakeholder networks so that we are apprised of decision making and can seek to influence where we have expertise. We chair, or are on the steering committee of, a range of national and global networks across inclusive education, disability and eye health and health. We have developed, over time comparable and demonstrable ways of measuring advocacy effectively, so that we can track progress across issues and countries, and in 2019-2020 we are rolling out an advocacy App to make sure our data is captured more effectively (quantitative data in particular). Both these methods enhance our coordination with strategic partners.

E. We listen to, involve and empower stakeholders

E.1. What avenues do you provide your stakeholders to provide feedback to you? What evidence demonstrates that key stakeholder groups acknowledge your organisation is good at listening and acting upon what you heard?

The methods we employ to gather feedback and learn from the people and communities we serve, vary across the organisation and in relation to the purpose of the feedback. For example, the monitoring and support visits conducted by country offices with partners, will use a standardized information gathering form, capturing feedback from project beneficiaries. This exercise is a form of quality assurance, the information received may be comments on the service provided, a suggestion for adaptation, or an expression of appreciation. The information is useful to allow country office staff to identify and execute required changes, and to learn what works well from the viewpoint of those individuals most impacted by the services we provide.

In 2019, we participated in a Partner Organisation Effectiveness (POE) Review with the Bill & Melinda Gates Foundation. The POE review was conducted by consultants from ReD Associates, to explore how Sightsavers functions as an organisation, identify our strengths and weaknesses, and any priorities for growth and improvement. The review was carried out via a series of face to face consultations with individual and cross team groups, ranging from trustees, senior management, and staff from across the organisation, as well as some external partners and donors. Findings from the reviews highlighted a number of areas of success as well as some areas for improvement. In relation to our organisational strategic refresh the review identified that “Sightsavers has created a structured process to involve different groups in the refresh, to ensure staff’s input is reflected in the strategy and to obtain buy in internally. As a result, employees are energised by the process, feel heard and express confidence that the next chapter will be equally engaging and successful.” The review also identified valuable recommendations to take forward across areas of strategy, governance, leadership, processes and recruitment which have been disseminated and next actions discussed with Trustees and Management. These recommendations include areas where we can enhance our engagement with both internal and external stakeholders.

In 2019 we began to develop a specific approach to gather feedback on patient satisfaction in our eye health projects. This approach is in partnership with those health facility management teams who wish to improve their accountability to patients, working with them to support the development of their own feedback mechanisms. This provides a sustainable approach to stakeholder feedback that will remain beyond the lifetime of the project and can be a lasting legacy for the people and communities we serve. One example, from a programme spanning nine eye health facilities in Bangladesh and Pakistan, has seen the development of surveys for patients receiving care.

With an increasing number of inclusive education projects our approach to hearing from children is also evolving. For example, in 2018 we conducted a mid-term review of a project in northern Sierra Leone and invited girls with disabilities to give us their views on the quality of education they were receiving in our partner schools. This method encouraged reflection in an age appropriate way, facilitated by a reviewer with experience of working with children with disabilities and an interpreter. The children were known to each other and were brought together in a familiar classroom in their school to meet the reviewer and interpreter. An introductory exercise using picture
cards helped to break the ice, explain the purpose of the meeting and ensure each child wished to participate. Group discussion exploring their likes and dislikes about school led into a drawing activity in which the girls drew representations of their favourite classrooms and their experiences in the classroom. This enabled an exploration of whether the lessons and the teaching were accessible, appropriate and were improving learning.

We also conduct periodic internal staff surveys. In 2018 Sightsavers’ management team distributed an organisation-wide employee survey that was completed by 98% of employees. The results were made available to all staff on Sightsavers’ intranet and an organisation-wide directorate level analysis of the findings was completed, as a measurement of progress against the 2015 survey results. Staff were then invited to feedback on the analysis and identify opportunities for Sightsavers to improve working conditions at a departmental level. We plan to survey staff again in 2020.

E.2. What evidence confirms a high level of stakeholder engagement in your activities and decisions from beginning to end?

Stakeholder engagement is key to our work and we have enshrined this commitment in our project design processes (PDP). We ensure that disabled people’s organisations, and other in-country partners including national governments are consulted and valued throughout project conceptualisation, design, and implementation. This not only improves and makes relevant the programmes we run, but it also ensures that sustainability is considered, and those stakeholders are positioned to take ownership of the programme as we exit.

A specific example of stakeholder engagement in our activities was the full review of Sightsavers quality assurance, and Quality Standard Assessment Tool (QSAT) processes, conducted in 2017-2018. This process involved using questionnaires and key stakeholder interviews to better understand stakeholders' requirements and their understanding of the tools. Almost all of this report’s recommendations have now been implemented, leading to a significant improvement in organisational understanding and the utility of the processes. The main findings and changes since have included:

- The development of a comprehensive set of support materials for all QSATs
- Training of more facilitators and assessors who can conduct both Programme Cycle Management and Thematic QSATs
- Significantly improved monitoring of action plan completion and the creation of an annual QSAT data report showing trends and gaps.

It is not only the monitoring of quality that forms an important part of our programme work, but also its sound evidence base. Our research has also benefited from the involvement of stakeholders. In East and West Africa, we continue to use an inclusive methodology known as community-based participatory research (CBPR). This methodology involves shared decision-making and ownership. Members of the community are involved in planning, gathering and analysing evidence, and sharing what is discovered. In 2019, Sightsavers’ community-based participatory research expanded into our NTD work, capturing the lived experiences of those with NTDs seeking ongoing care in Nigeria. Community researchers included those with lymphedema and leprosy interviewing others in similar circumstances.

Our CBPR education research has continued to ensure that the experiences and ideas of children and young people with disabilities, their parents and their teachers, have shaped Sightsavers’ education interventions in their contexts. Approaching research this way has identified enablers and barriers to effective inclusive education as identified by children with disabilities, their parents and teachers. Sightsavers has been developing ways for community members, especially those with disabilities, to be a central part of analysing data that is relevant to them and their community. This has become a particular strength for us. Through being involved in a community-based participatory research process a large number of stakeholders are exploring their potential through increased voice, agency and participation, whether as community researchers or research participants.

Engagement with stakeholders has also been key to our NTD work on the Onchocerciasis Elimination Mapping Project. This project in Ghana and Nigeria has centred on developing new ways to collect valuable data on this disease, also known as River Blindness. During the first few months of the project, we coordinated with national programmes, built new coalitions and devised a training curriculum. We continued this collaborative approach to the programme, as we expanded its implementation to selected districts of Mozambique in 2019.
E.3. What are the main likes/dislikes you have received from key stakeholders? How, specifically, have you reacted to their feedback?

All our reviews and evaluations actively seek feedback from partners which is shared with Sightsavers staff for response and action. In 2018-2019, nine evaluations and mid-term reviews were conducted by independent evaluators, which ensures impartiality and robust methods and analysis of findings and recommendations from the people and communities we serve. These evaluations typically used key informant interviews with project stakeholders and partners, and focus group discussions with service users and community members, to gather their views and experiences. All evaluations produce a set of recommendations, and an action plan to respond to these recommendations is formulated as part of the management response process, and are made publicly available here.

As an example, following on from consultation with local stakeholders, the end of term evaluation of the Early Childhood Development project funded by Comic Relief in Malawi made some recommendations to address nutrition for children with disabilities and to create a sustainable model to support the activities of the Community Based Childcare Centres. Subsequently, an extension of the project was granted, which has built in livelihood’s approaches to support the project activities and the childcare centres going forward, including a livestock scheme and community garden to grow cereal for the children.

In the same period, seven projects were reviewed internally, using a variety of different approaches including workshops and theory of change reviews. For example, the mid-term review for the UK Aid Match funded inclusive eye health projects in Pakistan and Bangladesh was conducted as a participatory regional workshop with the projects’ partners and other stakeholders. The workshop facilitated the co-creation of programmatic learning questions and recommendations which will be taken forward collaboratively.

The Inclusive Futures programme have adaptive management as a core theme. The programmes aim to facilitate people with disabilities to lead and drive the change they want to see. The projects have been designed in a participatory manner with DPOs and government stakeholders. Feedback from a design workshop, scheduled to review results of situational analysis data collected, indicated that some stakeholders have never before attended a workshop of that nature and welcomed the opportunity. Stakeholders appreciated the opportunity it presented for meeting one another, and key information on a particular government initiative was shared which the DPOs had previously been unaware of.

Across in our NTD programme, Ascend, we sent post-inception phase feedback questionnaires to our key stakeholders across 13 countries. These provided us with some very constructive feedback, from which we were able to derive several useful learnings:

- According to the questionnaire results, the difficulty most encountered were tight time constraints. Country teams were required to complete a large package inception documents over a short space of time due to tight DFID deadlines and thus 47.46% of respondents suggested that more time would have been welcomed. The Ascend country teams were required to consult the ministries of health in each country, a process that takes time, and as a result many felt that inception was rushed and that communication channels were not adequately established before inception commenced. A lengthier timeframe would have allowed for more in-depth planning and preparation.
- Many respondents suggested that the country teams should also have been provided with comprehensive instructions on how to complete each inception process template and been given easier access to technical assistants to support their completion.

The Sightsavers Technical Hub analysed the results of this feedback questionnaire and shared them with Ascend Senior Management. This has allowed us to adapt our processes as we move forward with the programme and is informing future pre-project planning methods.

E.4. How do you know that people and partners you worked with have gained capacities, means, self-esteem or institutional strengths that last beyond your immediate intervention?

As referenced in objective B.1, Sightsavers takes a varied approach to achieving sustainability and lasting impact in its programmes, principally involving taking a system strengthening approach. As we see evidence of the capacity of infrastructure, human resource and government policy develop within the contexts where we work, during our programme cycles, we are able to determine the lasting impact of our interventions. This process is formalised with the embedding of exit strategies throughout the projects’ design and implementation and the technical development of partners through our QSAT tool. In addition to this we have also carried out impact
evaluations on projects. These processes involve collecting data at the inception of project, throughout its lifecycle, and then after we have exited. From this we can determine if, for example, a drop in blindness prevalence has happened as a result of our work and its lasting effects. A specific example of this process has been given in B.1. above.

**Accessibility**

In 2018 we began to support health partners through our inclusive eye health programmes in Mozambique, Bangladesh and Pakistan with making adaptations to their infrastructure to improve access for people with disabilities. Following a review of existing resources suggesting that audit tools publicly available were not fit for purpose, Sightsavers developed a toolkit to assess the level of accessibility of health infrastructure and inform the development of national frameworks. This resulted in the creation of our Accessibility Standards and Audit Pack, which is now freely available to governments, DPOs, NGOs and other stakeholders in the development sector (and can be viewed [here](#)). The pack comprises: training materials; a manual with accessibility standards for health facilities in low- and middle-income settings; accessibility audit checklists; a bespoke tape measure with visual information; report, scoring and costing templates.

This helped support nine health facilities to make permanent changes to their facilities, such as ramps and accessible toilets, that will have a lasting impact enabling people to reach eye health services and improving their quality of life. In each new eye health programme since, hospital partners undertake an ‘accessibility audit’ as part of design and where necessary funds for permanent adaptations to infrastructure are included. This approach to infrastructural changes is also seen in some inclusive education projects where we work directly with schools.

**Data management assistance**

The data management assistance process has been ongoing since 2016 and looks at providing data management skills to Sightsavers project staff and improve data systems within our partner organisations. This is a long-term objective to improve data quality through capacity building of human resources and systems.

During 2018 countries across our portfolio were working to improve the quality of the data they submitted. This included work on education projects in Cameroon and Senegal, improving the tools and understanding around measuring school transition rates for children with disabilities. Work was also conducted in mapping and providing data management support and skills in Pakistan and Bangladesh, including making recommendations on the healthcare management information system in place in hospitals in Bangladesh, to ensure that data is accurately captured for every patient.

During 2019 a reappraisal of our data management assistance process was conducted. From this a three-year strategy has been developed to improve the data management skills of all country office staff within the organisation.

**QSATs**

The QSAT continues to be a significant part of our ongoing support of partners to improve the quality of their service delivery.

During the period 2018-2019, 51 thematic assessments were conducted across 6 different themes including Cataracts, Schistosomiasis, Soil-transmitted Helminths, Lymphatic Filariasis, Onchocerciasis. This also included the successful piloting of paediatric cataract standards and incorporation of safeguarding requirements into all QSATs which will help ensure the sustained quality of service provision and safety of patients.

Thematic QSATs are often used as a baseline and end-line assessment of quality. During the baseline assessment an action plan will be developed based on quality gaps which are identified. The idea being that by completing the actions there will be an improvement in quality within the facility, which is then measured by the end-line assessment. Where thematic QSATs were being conducted as an end-line during 2018-2019, quality improvement was noted in 11 of the 13 assessments. This proven methodology for quality improvement provides long term enhancement in patient treatment and care.

**Supporting partners to improve capacity via MPC and Due Diligence action plans**

See point D.1. for an overview of our two-stage partner due diligence process, that incorporates Minimum Partnership Criteria (MPC) desk research (all partners), followed by a face-to-face Due Diligence and Safeguarding assessment (all partners due to implement project activities and/or receive funds from Sightsavers).
F. Our advocacy work addresses the root causes of problems

F.1. How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions?

Sightsavers works closely with people with disabilities and their representative organisations at national, regional and global level to ensure that our policy positions and advocacy activities are well informed, evidence based and of the highest quality. Sightsavers is not an organisation of people with disabilities, as a result we need to ensure that the experiences and perspectives we represent are evidence led. We seek to create what we term an enabling environment, where we work to empower and enable organisations of people with disabilities to engage and participate particularly in critical areas such as, but not restricted to, the UN Convention on the Rights of Persons with Disabilities and the Sustainable Development Goals (SDGs).

For example, we work to promote the follow up and review processes of the SDGs, notably through the voluntary national review (VNR) processes. Held annually at the High-Level Political Forum on Sustainable Development (HLPF) they are the main accountability mechanism to review national progress against the Sustainable Development Goals. In Pakistan, Tanzania, Ghana, Sierra Leone and Cameroon we worked to support national VNR processes and facilitated the participation of people with disabilities (and their representative organisations) to ensure that the reports submitted by governments reflected the views and situation of people with disabilities and that those individuals and groups able to attend and participate in relevant stakeholder processes. At regional level, we engaged in several regional forums aimed at promoting the follow up and review processes including the Africa Regional Forum on Sustainable Development and Asia Pacific Sustainable Development Forum.

Additionally, Objective Two of our Research Strategy (see here) outlines our commitment to understanding and describing the needs, systems and contexts of our programmes. We can then use this evidence to inform the advocacy work we undertake and the policy direction we seek from our government partners.

F.2. How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?

Linking people with disabilities, and their representative organisations, with Sightsavers advocacy work is extremely important to the organisation. In 2019 we piloted an approach to the policy campaign that involved the direct engagement and empowerment of people with disabilities.

The vision of our policy campaign is to make disability inclusive development a reality. By that we mean that people with disabilities have a say in the development decisions that affect them. In 2019 we saw the effective implementation of #EqualWorld, which sought to increase the public and political participation and representation of women and girls with disabilities. We targeted men and women with disabilities with (distinct) policy campaigns across 13 countries, identifying where the campaign could be used effectively to leverage change at national level. This culminated in a global petition of 50,455 signatures secured in a matter of months. The petition handed in to the UN Under Secretary General, on 3rd December called for a more #EqualWorld. Additional policy commitments were secured in Bangladesh, Pakistan, Nigeria and Uganda as a result of the campaign. Overall #EqualWorld made 3.2 million impressions on social media and media coverage around the campaign launch reached more than 2.7m people across 14 countries (which we believe to be an underestimate). The campaign microsite attracted 46,344 new users. While it is not possible to disaggregate the social media data to understand our reach to people with disabilities themselves, the petition demonstrates that we can work to empower and leverage the voices of people with disabilities. At country level we fed back our successes and shared outcomes.
G. We are transparent, invite dialogue and protect stakeholders’ safety

G.1. Are your annual budgets, policies (especially regarding complaints, governance, staffing/salaries and operations), evaluations, top executive remuneration and vital statistics about the organisation (including number of offices and number of staff/volunteers/partners) easily available on your website in languages accessible by your key stakeholders? Please provide links, highlight membership in initiatives such as IATI and outline offline efforts to promote transparency.

Our previous year’s accounts and current polices are available to all stakeholders via our website. Our annual reports contain information on our governance, staffing and salaries, operations, complaints and budgets. These can be accessed on our website by clicking here. These reports have been designed for use with screen reading technology, ensuring we reach a more diverse audience.

A detailed breakdown of Sightsavers’ financial results for 2019 can be found in the Annual Report and Accounts, which will be published on the Sightsavers website (from July 2020). Our preliminary 2019 full year group total income was £104 million.

(Please note, these figures have been disclosed with the caveat that they remain confidential and will not be made public until released as part of our annual report in July 2020).

Sightsavers’ principle on remuneration is to ensure the reward package is competitive with other equivalent organisations in the areas where it works (both geographically and by type of role), so it is able to attract and retain staff. We see our ability to recruit and retain key staff as fundamental and it is a key organisational risk. Salaries are compared across other INGOs and, where appropriate, other types of organisations, and we look at medians as the basis of pay. This is not rigid as there are times when there is a need to offer more, and times when an individual is still growing into a role so less is offered. A number of different survey providers are used and, where appropriate, a direct comparison with other similar NGOs is undertaken. The remuneration committee sets the salary for the Chief Executive, approves the salaries of her direct reports and the overall reward structure and policy. Our audited and published Annual Report and Financial Accounts provide a breakdown of salary levels as required by the SORP.

A list of key policies is also provided on our website and can be accessed using the following link.
https://www.sightsavers.org/how-were-run/accountability-and-transparency/

Further information relating to our transparency and accountability to stakeholders can be accessed by using the following IATI links:
http://dashboard.iatistandard.org/publisher/ss-org.html

G.2. What policies do you have in place to ensure a fair pay scale? Do you measure the gender pay gap in your organisation, and if so what is it? What are the salaries of the five most senior positions in the organisation, and what is the ratio between the top and bottom salaries? If this information cannot be provided or is confidential, please explain why.

Sightsavers has a global reward policy which details how we ensure fair pay (see annex 3 of this report). All roles are reviewed and allocated a grade and function based on their job descriptions. Sightsavers contributes to local market surveys in the UK and the overseas countries where we work. The data from these surveys is used to benchmark Sightsavers roles. The median from the surveys for each grade and function combination is used as the benchmark and we aim to be within a percentage either side of the median for each role. All roles based in country are benchmarked using local pay scales. For technical/specialist roles which are not covered by the surveys we look at different available sources and current adverts for bespoke benchmarks as appropriate. Gender is not considered when benchmarking, the role is considered on its own merit.
Sightsavers has been responsive to external interest in the salary ratio of the highest paid employee (CEO) to the lowest paid employee in the UK. The ratio remains 6:1 (excluding interns). The ratio of highest to median also remains the same at 3:1. This is considered to be a fairly good ratio and Sightsavers is not aiming for any less.

Gender pay gap is reviewed on a quarterly basis. The difference in mean pay as at the end of Dec 19 between male and female employees in the UK is 2.54% higher for men. The difference in median pay during the pay period between male and female employees is 4.49% higher for men (our UK Gender Pay Gap Report can be viewed here).

The difference is generally down to the fact that we have a higher proportion of female staff in the UK at lower grade roles.

The majority of staff employed by Sightsavers are employed outside of the UK. We reviewed gender pay gap for this group annually at pay review time. This dataset varies due to the fact that we benchmark salaries to local markets and as a result of exchange rate fluctuations versus our reporting currency. That said we tend to see a gender pay gap which is reversed as there are more men employed on lower grades outside the UK.

The pay for the CEO as at the end of 2019 is £139,138. This is published in the annual report (will be verifiable in 2019 annual report). Sightsavers does not publish the salaries of the five most senior positions, instead it publishes the number of staff with emoluments within ranges as required by the SORP. The below table is from the 2018 annual report:

<table>
<thead>
<tr>
<th>Range</th>
<th>No. employees 2018</th>
<th>No. employees 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>£60,000 - £69,999</td>
<td>13</td>
<td>12</td>
</tr>
<tr>
<td>£70,000 - £79,999</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>£80,000 - £89,999</td>
<td>6</td>
<td>4</td>
</tr>
<tr>
<td>£90,000 - £99,999</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>£100,000 - £109,999</td>
<td>-</td>
<td>2</td>
</tr>
<tr>
<td>£110,000 - £119,999</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>£120,000 - £129,999</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>£130,000 - £139,999</td>
<td>2</td>
<td>1</td>
</tr>
</tbody>
</table>

G.3. How do you ensure privacy rights and protect personal data?

The security of information and personal data forms a core part of our planning and operations across all areas of our work. This is supported throughout the organisation where the principle of ‘privacy by design’ is embodied.

Cyber Essentials is a UK Government backed scheme aimed at helping organisations defend against internet-borne threats by developing key technical controls. Sightsavers was awarded the UK HMG Cyber Essentials certificate in 2018. Sightsavers has a dedicated information security team within the IT function, in order to support our Cyber Essentials accreditation and to safeguard systems and data. They lead on strategic strengthening of security controls and conduct monitoring of systems and threats. This has put us in a position of applying for the next level of certification, Cyber Essentials Plus, which is due in 2020.

Sightsavers has a Physical and Information Security Team (IPST), formed of key stakeholders within the security and resilience function and those of compliance, IT and key information processing stakeholders from around the organisation. Meeting quarterly, the IPST is responsible for reviewing physical and information security risk registers, strategic decision making and raising awareness.

Sightsavers undertook a large body of work in the lead up to May 2018 with the enforcement of the EU General Data Protection Regulation (GDPR) and the UK’s Data Protection Act 2018. Nearly two years on, processes and systems have been embedded and continue to go through constant improvement. This includes an update of the mandatory Data Protection e-learning module and accompanying data protection module. The Privacy Impact
Assessment (also known as a Data Privacy Impact Assessment) is now a required step in our project initiation process and forms part of our Programme Cycle Management Quality Manual.

G.4. Who are the five largest single donors and what is the monetary value of their contribution? Where private individual donors cannot be named due to requested anonymity, please explain what safeguards are in place to ensure that anonymous contributions do not have unfair influence on organisational activities.

<table>
<thead>
<tr>
<th>Donor</th>
<th>2019 £’000</th>
<th>2018 £’000</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK Department for International Development</td>
<td>20,607</td>
<td>13,753</td>
</tr>
<tr>
<td>Givewell</td>
<td>7,614</td>
<td>9,427</td>
</tr>
<tr>
<td>The Bill and Melinda Gates Foundation</td>
<td>6,958</td>
<td>2,255</td>
</tr>
<tr>
<td>The Commonwealth Fund</td>
<td>5,921</td>
<td>2,235</td>
</tr>
<tr>
<td>Accelerate Partners</td>
<td>3,871</td>
<td>1,947</td>
</tr>
</tbody>
</table>

Cluster C - What we do internally

H. Staff and volunteers are enabled to do their best

H.1. Provide evidence that recruitment and employment is fair and transparent.

The size and composition of the total workforce at Sightsavers for the 2019 reporting period is detailed in the table below.

<table>
<thead>
<tr>
<th>Sightsavers</th>
<th>Europe</th>
<th>UAE</th>
<th>WARO</th>
<th>ECSA</th>
<th>India</th>
<th>SE Asia</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full time</td>
<td>242</td>
<td>4</td>
<td>188</td>
<td>92</td>
<td>67</td>
<td>34</td>
</tr>
<tr>
<td>Part time</td>
<td>49</td>
<td>0</td>
<td>3</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>680</td>
<td>291</td>
<td>191</td>
<td>92</td>
<td>67</td>
<td>35</td>
</tr>
<tr>
<td>Permanent</td>
<td>232</td>
<td>1</td>
<td>49</td>
<td>7</td>
<td>0</td>
<td>11</td>
</tr>
<tr>
<td>Fixed term</td>
<td>59</td>
<td>3</td>
<td>142</td>
<td>85</td>
<td>67</td>
<td>24</td>
</tr>
<tr>
<td>Total</td>
<td>680</td>
<td>291</td>
<td>191</td>
<td>92</td>
<td>67</td>
<td>35</td>
</tr>
</tbody>
</table>

Our Global Diversity and Equality Policy sets our commitment to employing a workforce that reflects the diversity of local contexts and cultures. Sightsavers’ recruitment practices promote our commitment to hiring local staff at all levels by advertising all roles via online advertising and local print media. All roles are also advertised internally so...
that all employees receive notifications of new vacancies and can be considered as an internal candidate. Employees are offered contracts in line with national terms and conditions. As evidenced below all senior managers were hired locally in 2019 and Sightsavers has a successful record in the development of employees and internal promotions. Senior Managers include the Management team, Strategy team, Regional and Country Directors.

<table>
<thead>
<tr>
<th>Region</th>
<th>Senior Managers</th>
<th>Hired locally</th>
<th>Proportion</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2019</td>
<td>2019</td>
<td>2019</td>
</tr>
<tr>
<td>East, Central and Southern Africa</td>
<td>0</td>
<td>0</td>
<td>100%</td>
</tr>
<tr>
<td>India</td>
<td>2</td>
<td>2</td>
<td>100%</td>
</tr>
<tr>
<td>West Africa</td>
<td>0</td>
<td>0</td>
<td>100%</td>
</tr>
<tr>
<td>South Asia</td>
<td>1</td>
<td>1</td>
<td>100%</td>
</tr>
<tr>
<td>Europe</td>
<td>0</td>
<td>0</td>
<td>100%</td>
</tr>
</tbody>
</table>

A strategic objective in our Empowerment and Inclusion Strategic Framework is to “scale up effort to achieve diversity in the workplace.” We continue to have a proactive interdepartmental social inclusion working group within Sightsavers. Sub-groups have been created, to increase focus on key areas such as Communication, Country Office Engagement & Disability Data and these smaller teams feedback to the whole group at regular meetings. We continue to have a lunchtime seminar programme where speakers are invited to talk to staff on social inclusion and accessibility, which are available to all employees through conferencing facilities; the compulsory disability inclusion training session started in 2017 for all staff is continuing; learning opportunities for staff to attend training sessions with the RNIB and learn British Sign Language; the creation of accessible guidelines and document templates for staff (which is available on the e-learning module).

In 2019, a Disability Employee Network was created, which is available for all employees to get involved with new initiatives.

Data obtained from Sightsavers HR Information System, provides a breakdown regarding gender and ethnicity within each region:

<table>
<thead>
<tr>
<th>Region</th>
<th>Sightsavers 2019</th>
<th>Sightsavers 2017</th>
<th>Europe</th>
<th>West Africa</th>
<th>ECSA</th>
<th>India</th>
<th>South Asia</th>
<th>UAE</th>
<th>USA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>680</td>
<td>531</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>343</td>
<td>286</td>
<td>88</td>
<td>133</td>
<td>56</td>
<td>43</td>
<td>21</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Female</td>
<td>337</td>
<td>245</td>
<td>199</td>
<td>58</td>
<td>40</td>
<td>22</td>
<td>14</td>
<td>4</td>
<td>0</td>
</tr>
</tbody>
</table>

**Ethnicity**

- White British: 203 (2017: 154) 201 (1) 1
- White Other: 30 (18) 29 (1)
- White Irish: 13 (9) 13 (1)
- Black African: 222 (178) 5 (145) 72 (1)
- Black other: 7 (5) 2 (1) 3 (1)
- Asian other: 11 (9) 4 (2) 1 (1) 3 (1)
- Asian Indian: 52 (44) 1 (49) 1 (1)
- Asian Pakistani: 9 (10) 1 (8)
- Asian Bangladeshi: 18 (13) 2 (16)
- Mixed Heritage other: 6 (4) 3 (3)
- Mixed Heritage White & Asian: 3 (3) 3 (3)
- Undisclosed: 106 (84) 23 (42) 17 (16) 6 (2)

**Age:**

<table>
<thead>
<tr>
<th>Age</th>
<th>2019</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 30</td>
<td>79</td>
<td>59</td>
</tr>
</tbody>
</table>
Sightsavers’ continues with its commitment to be an employer of choice for people with disabilities and in February 2020, we were awarded the ‘Disability Confident Leader’ accreditation from the UK government Department for Work and Pensions, which can only be achieved by an organisation that has passed an external assessment. Over 17,300 employers have signed up to the Disability Confident scheme but the Disability Confident Leader accreditation is shared with just 300 of these and Sightsavers is one of only two international NGO’s to have achieved this accolade.

Sightsavers attained Disability Confident Leadership status by undertaking a range of activities including; advertising vacancies with a specialist jobs board that targets candidates with disabilities; setting a disability confident expectation with the recruitment agencies we work with; working with local Job Centre teams in the UK; piloting alternative application and selection methods to encourage applications from neurodiverse candidates; raising awareness internally through an interdepartmental Social Inclusion Working Group; hosting talks by external speakers on a diverse range of disabilities; engaging an occupational health provider that understands the work of NGO’s; the provision of disability awareness training for new starters; creating an online wellbeing hub for all staff and much more. While Sightsavers is proud to have achieved Disability Confident Leader status, we are keen to continue to innovate and further develop our approach to attracting and retaining talented individuals with disabilities.

H.2. What are you doing to invest in staff development? What indicators demonstrate your progress? What are your plans to improve?

The learning and development of employees is managed across the organisation by senior managers and line managers dependent on organisational and departmental needs and objectives. Administrative support when required is provided by the HR Operations team. Internal coaching and team building are available to all employees from two Senior HR Business Partners, both have extensive experience in performance and organisational development. One SHRBP is an accredited Insights Discovery Client Practitioner – carrying out individual profiling and coaching and team-building workshops, the other SHRBP does Executive Coaching and Mentoring. The SHRBP’s work closely with management to identify and support individual and team development on an ongoing basis but additionally through developing and running ‘Knowledge Café’s which are designed for anyone with people management responsibilities.

Sightsavers continues to use the ‘Valuing Individual Performance’ (VIP) system which was developed for the organisation by the Senior HR Business Partners following a staff survey, extensive consultation with the Directorate leads of the organisation and taking feedback from managers to design a more user friendly process. Managers can plan learning and development activities for their team and for individuals (managers continue to hold their own training and development budgets). We do not monitor completion rates under this process, as reviews are conducted on a ‘rolling’ basis. Each staff member can expect a formal development review at least every 12 months and which will be the responsibility of line managers, who also hold responsibility for training and development budgets.

Sightsavers’ undertakes a number of key initiatives (outlined below) that enable our staff to be more productive and take leadership in their roles:

- **Policies and procedure** – are available via the Sightsavers intranet and form a part of the core induction process for all employees. These are updated in accordance with any change in legislation and all thoroughly reviewed on an annual basis.

- **Employee surveys** – The employee survey provides an opportunity for staff members to provide feedback to the organisation in a broad range of areas. The 2018 response rate was high at 95%, with 96.9% of employees reporting that they are proud to work at Sightsavers (94% in 2015). Our next employee survey will run in the Summer of 2020.

- **Manager induction** – Senior HRBP’s continue to formally meet with all new managers to provide early support and during 2019 worked on an objective to develop a new formal approach for managers which included creating a training course for managers which is facilitated by an external trainer.
• **Employee Support** – Employees have access to an external 24-hour a day confidential EAP (Employee Assistance Programme) helpline which provides a wide variety of support & advice. Within Sightsavers, a Wellbeing Hub has been created and is accessible to all employees. On this hub, employees can find useful information and guidance to Sightsavers wellbeing resources. In 2019, Sightsavers invested in training a global group of Mental Health First Aiders, who can be contacted for support and guidance.

• **Wellbeing Taskforce** - At the end of 2019 a wellbeing taskforce was set up to look globally at initiatives to enhance employee wellbeing. The first priority was to publicise existing services and initiatives, to increase take up, but we have recently added meditation apps and discount gym memberships.

Sightsavers is committed to the learning and development of all employees across our Directorates. Investment in staff development is monitored via the SIM card which identifies the expenditure spent on staff development as a percentage of total salary cost. In 2019, our expenditure on staff development as a percentage of total salary costs was calculated to be 3.53%, exceeding our target of 2.5%.

We have three compulsory modules for staff across the organisation worldwide: Fraud, Whistleblowing and Safeguarding. The Data Protection module is compulsory for all staff across Europe only:

- The Fraud induction was launched in April 2019. The module explains what corruption is and how to spot it as well as Sightsavers’ response to corruption and the policies in place
- Whistleblowing Induction provides an overview of Sightsavers’ Global Whistleblowing Policy and Procedures
- Safeguarding Induction provides staff with all the information they need on Sightsavers’ safeguarding policy and processes, including how to report a concern. The module was relaunched on the 28th November 2018, to reflect changes in the policy and code of conduct
- Data Protection Induction was developed to help staff understand the basics of data protection and explains their rights and obligations as an owner and handler of personal data.

Additionally, there are non-compulsory modules available to all staff:

- Global Induction - provides a background to Sightsavers work
- Security - outlines how the organisation manages physical security
- Cyber security - providing information on the best practices employees should follow to keep equipment and data secure
- Security in A Diverse World module focuses on equality and diversity in the workplace, with individual safety and security in mind.

**H.3. How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct? What indicators demonstrate your progress? What are your plans to improve?**

Sightsavers has a range of robust policies in place to ensure a safe working environment for all its staff. Chiefly our Global Discrimination, Bullying and Harassment Policy, and Whistle Blowing Policy both of which can be found [here](#). These outline the processes, definitions and responsibilities of staff and management to provide a safe working environment for all.

The Complaints Working Group was established in 2019 with the primary aim of overseeing the implementation of the agreed recommendations that were made in the report on the review of Sightsavers complaints management system. It also presents a space within the organisation for the recognition and challenges and for proposing strategies to address these. The members of the group are drawn from across the business, which helps to ensure that a wide range of territories and functions contributes to the strengthening and development of policy and procedure. It also includes links into both our safeguarding and whistleblowing mechanisms. Thus far, the group has reviewed and updated the definition of complaints for policy practice and purposes. Also, it has been working on the development of an IT based solution that will enable the organisation to more cohesively and coherently administer complaints received across the business and to report more effectively on this performance. Sightsavers also makes available a range of employee support referred to in H.2. above.
I. Resources are handled effectively for the public good

I.1. How do you acquire resources in line with your values and globally-accepted standards and without compromising your independence?

Sightsavers’ Global Fundraising and Donations Acceptance policy (included as annex 2 to this report) covers our global fundraising operations in India, the Middle-East the US and Europe. This policy provides guidance and clarity for staff, trustees and other volunteers to ensure compliance with the law and Charity Commission guidance and to protect Sightsavers’ reputation. For internal procedure, the policy describes who has authority to take decisions in regard to donation acceptance and its existence ensures that decisions taken are consistent and based on the needs of the organisation. The policy has been rolled out globally, to all fundraising and country offices and forms part of the core induction for new employees and was updated in February 2019.

Our policy covers all donations from third parties and applies in all conditions. Once a donor’s contribution to Sightsavers exceeds the £10,000 threshold, either in a single donation or cumulatively over the preceding 12 month period, they become subject to a number of policy guidelines which protect our independence and ensure that we are not obtaining funds in a way which is contrary to our beliefs.

With regards to transparency and accountability to our supporters and beneficiaries, we have a dedicated page on our website which outlines our ‘fundraising promise’ and provides detail on our membership to the Fundraising Regulator, Direct Marketing Association and the Institute of Fundraising, and provides contact details for directing queries relating to fundraising activities. This dedicated page is accompanied by our ‘Supporter Promise and Privacy Policy’ in which we make a number of promises to protect the data of our supporters and outline how their data will be managed. This policy is publicly available on our website by clicking here.

We are members of the Fundraising Regulator, which has taken over from the Fundraising Standards Board. The Fundraising Regulator is the independent regulator of charitable fundraising in England and Wales, established in 2016 following the Etherington review of fundraising self-regulation (2015) to strengthen the system of charity regulation and restore public trust in fundraising.

Information on major institutional gifts and gifts in-kind are fully disclosed in our annual report and accounts, published on our website here.

I.2. How is progress continually monitored against strategic objectives and resources re-allocated to optimise impact?

Sightsavers continues to track Strategic performance using the methods that have been outlined in previous reports. We use our Strategy, Monitoring, and Implementation Card (SIM Card) to track and monitor performance at a strategic level, breaking down our overall strategy into a small number of clear objectives that reflect different elements of strategic implementation – resources, learning and growth, capacities and beneficiary impact. We have a dynamic management structure that ensures key strategic and operational issues are discussed quickly through our monthly Management Team meetings, which is focussed on capturing, discussing and resolving real time issues that are cropping up and are having an impact on our ability to deliver against those objectives – the meeting is results focused, bringing together key management stakeholders to find solutions that ensure organisational progress is maintained. Beyond this structure we make sure that our managers are empowered to make decisions within their own areas of responsibility so that issues are resolved quickly and effectively at the right level of implementation. Sightsavers runs its own management training programme to ensure that staff taking up management roles in the organisation, either through promotion or external recruitment, are equipped to make decisions to ensure activities and strategic progress is maintained.

From a fundraising perspective, we have worked to develop standardised reporting across all funding streams in all our key fundraising territories so that we can make objective investment and allocation decisions to maximise returns – a key strategic objective. Within reason and governance structure restraints, we aim to use regularly updated information on fundraising performance to decide where we invest and in what channels to maximise returns. This has meant considerable work within our fundraising analytics teams to develop methodologies that enable the comparison of returns across different markets. The approach is clear – we try to ensure that we are investing where we know we will generate the most net income, looking both in the short and long terms. If channels or territories are not providing returns we will stop or reduce investment quickly and shift to those that are. As a result, we have switched completely out of face to face and door to door fundraising in recent years and are also now looking to withdraw from our Swedish fundraising operation.
From a programme perspective we have a dynamic resource allocation and monitoring process. We ensure that all programme development is in line with our strategy through our ROAR oversight mechanism. All programme development priorities are reviewed and discussed by the ROAR group with ideas for programme priorities, developed by our technical leads working closely with country offices, brought to the meeting to be reviewed and prioritised. Alignment of these programmatic ideas with our thematic and overall strategies is central to the decision-making process within ROAR. Once a programme proposal has been approved, design takes place involving all key stakeholders from across the organisation to ensure understanding and buy in from all parts of the organisation. These same groups are part of our key programme oversight reporting process (PRO) which brings key stakeholders together quarterly for in depth reviews of projects to assess progress, highlight challenges and identify action plans for moving forward and resolving issues. This all builds on ongoing technical support, monitoring oversight, and financial management support that flows into projects from global teams and country offices. We have a very flexible financial management and budgeting process that enables us to respond to challenges that are highlighted within this PRO process. Overall financial position for the organisation is tracked monthly and we have a very rapid turn-around for the production of organisational management accounts – publishing them 12 working days after month end. At a country office level, our finance staff work very closely with our partners to ensure that actual financial management information flows quickly and that there is transparency around performance that sits outside of formal monthly or quarter reporting. Our ability to flag up programmatic challenges and our dynamic understanding of the organisational financial position enables us to make strategic financial allocations within the year when they are required, so long as these are within overall organisational affordability and donor acceptability. We are not constrained by rigid budget / forecast review timetables. This ability to respond strategically and quickly on both the programmatic and finance side is the result of our strong systems infrastructure that enables decision making data to flow through to those that need it in usable form quickly.

I.3. How do you minimise the risk of corruption, bribery or misuse of funds? Which financial controls do you have in place? What do you do when controls fail? Describe relevant situations that occurred in this reporting period. What are your plans to improve?

Our Anti-Fraud and Corruption Policy outlines our definitions, investigation procedures and penalties for incidences of fraud, applying to staff, partners and third parties (it has been included as annex 4 to this report).

In 2018 there was one internal fraud involving a staff member overclaiming on expenses. The individual was dismissed and the matter reported to the police. In addition to this our partners reported five substantiated frauds or thefts. Two individuals were dismissed for contract fraud and accepting kickbacks. Two finance staff at another partner were dismissed and subsequently arrested for fraudulent invoicing. Another partner was robbed of funds from a car that were destined for a regional hospital. Two separate incidents involving the theft of pharmaceuticals from ministry of health warehouses occurred.

In 2019 a member of staff engaged in expenses fraud and was dismissed as a result. Sightsavers was also the victim of a cyber-fraud involving the submission of false invoices. One of the invoices was paid which resulted in a financial loss. One partner also reported a fraud involving inflated invoicing and expenses and the member of staff involved was dismissed.

In addition to the above there has been an increase in the number of personal attacks on staff involving theft where money, personal items and laptops were stolen.

All incidents whether internal or with partners are fully reviewed with the aim of preventing further abuse as a result of strengthening control and improving systems and procedures. Particular emphasis was placed on re-enforcing IT security and raising staff awareness to the growing threat from all forms of cyber abuse. All substantiated fraud is reported to our donors and to the relevant regulators.

We have further strengthened our regional / country financial control mechanisms by the creation in 2019 of our new African Finance Team. Prior to the team’s creation, we had individual Regional Finance Managers in East and West Africa, working largely independently and supporting the financial and programme staff in their region’s country offices. We have taken the step to merge these regional functions into a single African Finance Team that is focussed on supporting all offices across the continent. We have also increased the capacity of the team from three to six staff members. The team will identify good practice being demonstrated in individual offices and will look to roll that out across all of our African operations. It will also look for opportunities to strengthen controls by identifying areas where we would benefit from joined up approaches across all offices and by providing workable solutions to common problems – for instance looking at outsourcing payroll or centralising more payments through
our organisational finance team. As banks and financial systems in Africa become more joined up, the opportunity to exploit our centralised financial function and strong core systems to support country offices becomes ever greater. An overarching aim of the team is to streamline our country office finance systems and operations, reducing complexity at country office level, and enabling country finance staff to spend more time working with and developing partner level financial capacity – a key component in ensure overall financial oversight and control.

As part of our drive to make staff aware of updates to our anti-fraud policy, Sightsavers developed and launched a mandatory e-learning package for all staff in Q1 2019. All staff, including new hires must complete the training. This not only raises the awareness of the signs of fraud, and of the policy, but also of the obligations to report. The zero-tolerance position with regard to fraud is supported by an annual message to all staff by the CEO, reiterating this position and reminding staff generally of the Anti-Fraud and Corruption Policy and Whistleblowing Policy.

**J. Governance processes maximise accountability**

**J.1. What is your governance structure your policies/practices regarding replacing and recruiting new trustees/board members?**

Sightsavers has a governing Council of Trustees which consists of 15 trustees. The Council is committed to maintaining a high standard of corporate governance. Details of our trustees can be found here 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.

Sightsavers various global boards have rich lines of communication, which are reinforced more formally every January with the Away Day. The chairs of all of Sightsavers boards are invited to this event, which includes a chairs-only dinner. Senior managers from across the organisation present to the UK board and the global chairs. Many of our boards have shared trustee ships, for example Sightsavers UK and Sightsavers Ireland have a reciprocal agreement where a member of each board also sits on the other. Similarly, trusteeships are shared and mixed between the boards of our smaller entities, such as Italy, Norway, Zambia and Kenya.

We aim to maintain a balanced gender ratio on the UK Council, which currently sits at 8:7. Other areas such as disability and geographic representation are based on fair representation rather than a prescriptive ratio. 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.

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. Once a trustee is appointed they are provided with access to an induction folder through an online platform. This provides them with all the appropriate resources including, Charity Commission of England and Wales guidance for Trustees, meeting minutes, corporate documents, policies, risk registers and annual reports. Additionally, trustees are required to undergo mandatory training on safeguarding, provided through an e-learning platform. Trustees are also invited to an induction by senior managers at our UK office.

**J.2. How does your board oversee the adherence to policies, resource allocation, potential risks and processes for complaints and grievances?**

Council retains ownership over a number of core organisational policies, which they review and approve updates for on a set schedule.

Council devolves responsibility to several standing committees for aspects of governance, assurance and control. The Audit Committee is accountable to the trustees for providing assurance that the resources of the Society are effectively managed, and utilised and that the controls and processes of the organisation are appropriate and effective. Any fraud, safeguarding issue or legal action is reported to this committee. The Investment Committee makes recommendations to Council on future Investment strategy and supporting policy required to implement it; current investment performance and allocations; treasury / forex / cash management; and has oversight of defined benefit pension scheme recovery plan (this scheme is closed both to new entrants and future accruals), working
closely with pension fund trustees. The Remuneration Committee approves the salaries of the CEO and his/her direct reports, recommends remuneration strategies and policies to Council and monitors their implementation. The Governance Committee advises Council on matters relating to governance of the Society, its subsidiaries and its affiliated country organisations, and nominations for Council, committees and affiliated boards.

Risk management and communication is overseen at both executive and Trustee level. The organisational risk log is coordinated by the Controller of Crisis and Risk and updated and reviewed formally every three months by Trustees. Risk Owners are responsible for consolidating and updating individual risks. At programmatic level, risk logs are updated regularly by programme teams and discussed, reviewed and communicated at specific risk meetings and working groups.

The Sightsavers’ Trustee taking the lead on Safeguarding meets formally with the Director of Legal Governance and Assurance, Controller of Crisis Risk and the Safeguarding Manager to discuss our response to Safeguarding complaints and issues, risks, operational systems and policy, and then feeds back to our main board on this. This meeting is formally structured, and its minutes are reviewed along with a safeguarding report by the Audit Committee at each of its meetings. The Safeguarding Trustee most recently provided advice and guidance on reporting issues to the UK charity Commission which the team are developing for implementation.

J.3. What processes and mechanisms does your organisation have in place to handle external complaints including those relating to unacceptable conduct of your staff, volunteers, or partner organisations? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.

In 2019 we conducted an internal audit of our complaint handling and undertook activities to implement the subsequent recommendations. We are actively strengthening our abilities to receive community complaints through its complaints working group, established in Q1 2019, and through our network of designated safeguarding leads and security focal points in each office location.

Additionally, our central safeguarding and research teams are working together to initiate focus groups with beneficiaries from the different thematic areas in which Sightsavers works, to design complaints mechanisms that reflect the needs of different communities. This will be an ongoing project throughout 2020. Currently, the complaints mechanism is displayed on posters in project locations and within Sightsavers’ premises with appropriate contact details displayed on them. Sightsavers also has dedicated mailboxes for safeguarding concerns and general complaints and an established and reviewed whistleblowing policy and a safeguarding policy.

Within the reporting period, Sightsavers has received twelve complaints of which seven were assessed as valid. All seven complaints were handled using the Global Complaints Policy or the Global Safeguarding Policy and were reported to Trustees, and appropriately reported to regulators and other stakeholders.

**Fundraising Complaints** – The table below shows external fundraising complaints received in 2018 – 2019

<table>
<thead>
<tr>
<th>Type of Fundraising</th>
<th>Complaints in 2018</th>
<th>Complaints in 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Telephone Fundraising</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Addressed Direct Mail</td>
<td>26</td>
<td>22</td>
</tr>
<tr>
<td>Email Fundraising</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>TV Advertisements</td>
<td>7</td>
<td>19</td>
</tr>
<tr>
<td>SMS Fundraising</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Press Advertisements</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2018</td>
<td>2019</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------</td>
<td>------</td>
</tr>
<tr>
<td>Magazine/Inserts</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Face to Face</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Outdoor Events</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Raffles</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fundraising from Businesses</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Trusts and Foundations</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Major Donor Fundraising</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Online Fundraising</td>
<td>6</td>
<td>2</td>
</tr>
<tr>
<td>Volunteer Fundraising</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Staff Salaries</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Other Admin Complaints</td>
<td>0</td>
<td>13</td>
</tr>
</tbody>
</table>

**J.4. How are internal complaints handled?** Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.

Internal complaints are handled by way of our [Global Grievance Policy](#). In 2018 we received 2 grievances, with neither being upheld. In 2019 we did not receive any grievances.

**J.5. How do you make decisions about the need for confidentiality and protecting the anonymity of those involved?**

All reports, and the information therein, are handled with strictest confidentiality to protect the identity of the individuals concerned, including the complainant and the subject of concern. Risk assessments are undertaken at the complaint handling phase to ensure confidentiality is, and can be, maintained throughout the investigation or complaints review cycles.

**K. Leadership is dedicated to fulfilling these 12 Commitments**

**K.1. How is the governing body and management held accountable for fulfilling their strategic promises including on accountability?**

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.
K.2. What steps have you taken to ensure that staff are included in discussing progress toward commitments to organisational accountability?

Our Accountable Now report is developed utilising contributions from various teams within the organisation, across all directorates. This not only provides a wide range of experience and expertise to the report, but also ensures that accountability is discussed and taken into consideration across teams. The report is also circulated internally within the organisation, along with the feedback from the Independent Review panel. This means that all staff can read and discuss the report contents and see how Sightsavers is delivering against the areas of commitment outlined.

The internal Transparency Working Group meets quarterly, to outline and ensure current efforts to engage with transparency and accountability initiatives. The Group ensures that these efforts are linked across functions, in order for transparency and accountability activities to be consistent across the organisation.

The Transparency Working Group has also developed an internal learning tool regarding accountability and transparency. This is a training module on our internal learning platform Gomo. The module explains the principles of transparency & accountability and goes into detail about both Accountable Now and IATI. The module outlines why accountability and transparency are important to our organisation and how we demonstrate them.

We make the Accountable Now report publicly available through the governance section on our website [here](#). We believe that making the report available in this way is a great tool for holding ourselves accountable and our activities transparent, enabling our beneficiaries, partners and stakeholders to hold us to account.

K.3. What is your accountability report’s scope of coverage? Are you reporting for the whole organisation or just the international secretariat? For secretariats of international federations, on which issues of accountability (or relating to Accountable Now’s 12 commitments) do your members report to you on, and with what frequency? Where there is no routine reporting, how do you use your coordinating functions to elevate attention to accountability issues throughout your federation?

This accountability report covers the entire organisation including its subsidiaries. At the time of submitting this report Sightsavers had seven subsidiary undertakings, established to facilitate alternative fundraising activities in the UK or to expand our fundraising operations and establish a permanent presence overseas. Each of these entities has a formal legal structure under the relevant country laws including a board of directors or trustees, and all are compliant with our accountability commitments. Sightsavers has included the activities of these subsidiaries within the boundary for reporting purposes. These entities operate integrally with the core organisation, are linked with legal contracts so their reporting for this report and their performance reported are equally integrated.

This report, along with panel feedback, is circulated to all employees, as well as being published on our website and uploaded to our staff intranet. The report and feedback are shared with employees globally and areas for further work discussed at management group meetings. In addition to these internal stakeholders, Sightsavers has been working with downstream partners on DFID-funded activity to enhance their awareness of accountability, by supporting them to join IATI. Meetings have been conducted in Bangladesh, Nigeria and Tanzania and many more are planned once travel is allowed. These meetings aim to explain what IATI is, what are the benefits and why it is important for the development community as a whole.

This report has been developed in alignment with the Accountable Now Reporting and Assessment Framework 2019. It consists of contributions from various functions within the organisation including, HR, Global Fundraising, Finance and Performance, Research and Evidence, Programme Systems, Policy and Advocacy and the NTD teams. This ensures accountability is embedded within the organisation to deliver against the areas of commitment highlighted in the report.
<table>
<thead>
<tr>
<th>Reporting Question</th>
<th>Self-Assessment Score (1 – 4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1. What are: a) your mission statement and b) your theory of change</td>
<td>4</td>
</tr>
<tr>
<td>A.2. What are your key indicators for success and how do you involve your stakeholders in developing them?</td>
<td>4</td>
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<tr>
<td>A.3. What progress has been achieved &amp; difficulties encountered against these indicators over the reporting period?</td>
<td>4</td>
</tr>
<tr>
<td>A.4. Have there been significant events or changes in your organisation or your sector over the reporting period of relevance to governance and accountability?</td>
<td>4</td>
</tr>
<tr>
<td>B.1. What have you done to ensure sustainability of your work beyond the project cycle, as per commitment 4? Is there evidence of success?</td>
<td>4</td>
</tr>
<tr>
<td>B.2. What lessons have been learned in this period? How have these lessons been transparently shared among internal and external stakeholders? How do you plan to use these lessons to improve your work in the future?</td>
<td>4</td>
</tr>
<tr>
<td>C.1. How does your organisation demonstrate excellence on your strategic priorities?</td>
<td>4</td>
</tr>
<tr>
<td>C.2. What evidence is there that your expertise is recognised and welcomed by your peers, partners and other stakeholders?</td>
<td>4</td>
</tr>
<tr>
<td>C.3. How does your organisation practice being inclusive and protecting human rights, including promoting women's rights and gender equality, in accordance with commitments 1-2?</td>
<td>4</td>
</tr>
<tr>
<td>C.4. How do you minimise your organisation’s negative impacts on your stakeholders, especially partners and the people you work for? How does your organisation protect those most susceptible to harassment, abuse, exploitation, or any other type of unacceptable conduct?</td>
<td>4</td>
</tr>
<tr>
<td>C.5. How do you demonstrate responsible stewardship for the environment?</td>
<td>3</td>
</tr>
<tr>
<td>D.1. Please list your key stakeholders. What process do you use to identify them?</td>
<td>4</td>
</tr>
<tr>
<td>Question</td>
<td>Score</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>D.2. How do you ensure you reach out to those who are impacted or concerned by your work?</td>
<td>4</td>
</tr>
<tr>
<td>D.3. How, specifically, do you maximise coordination with others operating in the same sectoral and geographic space with special reference to national and local actors?</td>
<td>4</td>
</tr>
<tr>
<td>E.1. What avenues do you provide your stakeholders to provide feedback to you? What evidence demonstrates that key stakeholder groups acknowledge your organisation is good at listening and acting upon what you heard?</td>
<td>3</td>
</tr>
<tr>
<td>E.2. What evidence confirms a high level of stakeholder engagement in your activities and decisions from beginning to end?</td>
<td>3</td>
</tr>
<tr>
<td>E.3. What are the main likes/dislikes you have received from key stakeholders? How, specifically, have you reacted to their feedback?</td>
<td>3</td>
</tr>
<tr>
<td>E.4. How do you know that people and partners you worked with have gained capacities, means, self-esteem or institutional strengths that last beyond your immediate intervention?</td>
<td>4</td>
</tr>
<tr>
<td>F.1. How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions?</td>
<td>4</td>
</tr>
<tr>
<td>F.2. How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?</td>
<td>4</td>
</tr>
<tr>
<td>G.1. Are your annual budgets, policies (especially regarding complaints, governance, staffing/salaries and operations), evaluations, top executive remuneration and vital statistics about the organisation (including number of offices and number of staff/volunteers/partners) easily available on your website in languages accessible by your key stakeholders? Please provide links, highlight membership in initiatives such as IATI and outline offline efforts to promote transparency.</td>
<td>4</td>
</tr>
<tr>
<td>G.2. What policies do you have in place to ensure a fair pay scale? Do you measure the gender pay gap in your organisation, and if so what is it? What are the salaries of the five most senior positions in the organisation, and what is the ratio between the top and bottom salaries? If this information cannot be provided or is confidential, please explain why.</td>
<td>4</td>
</tr>
<tr>
<td>G.3. How do you ensure privacy rights and protect personal data?</td>
<td>4</td>
</tr>
<tr>
<td>G.4. Who are the five largest single donors and what is the monetary value of their contribution? Where private individual donors cannot be named due to requested anonymity, please explain what safeguards are in place to ensure that anonymous contributions do not have unfair influence on organisational activities.</td>
<td>4</td>
</tr>
<tr>
<td>Section</td>
<td>Question</td>
</tr>
<tr>
<td>---------</td>
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</tr>
<tr>
<td>H.1.</td>
<td>Provide evidence that recruitment and employment is fair and transparent.</td>
</tr>
<tr>
<td>H.2.</td>
<td>What are you doing to invest in staff development? What indicators demonstrate your progress? What are your plans to improve?</td>
</tr>
<tr>
<td>H.3.</td>
<td>How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct? What indicators demonstrate your progress? What are your plans to improve?</td>
</tr>
<tr>
<td>I.1.</td>
<td>How do you acquire resources in line with your values and globally-accepted standards and without compromising your independence?</td>
</tr>
<tr>
<td>I.2.</td>
<td>How is progress continually monitored against strategic objectives and resources reallocated to optimise impact?</td>
</tr>
<tr>
<td>I.3.</td>
<td>How do you minimise the risk of corruption, bribery or misuse of funds? Which financial controls do you have in place? What do you do when controls fail? Describe relevant situations that occurred in this reporting period. What are your plans to improve?</td>
</tr>
<tr>
<td>J.1.</td>
<td>What is your governance structure your policies/practices regarding replacing and recruiting new trustees/board members?</td>
</tr>
<tr>
<td>J.2.</td>
<td>How does your board oversee the adherence to policies, resource allocation, potential risks and processes for complaints and grievances?</td>
</tr>
<tr>
<td>J.3.</td>
<td>What processes and mechanisms does your organisation have in place to handle external complaints including those relating to unacceptable conduct of your staff, volunteers, or partner organisations? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.</td>
</tr>
<tr>
<td>J.4.</td>
<td>How are internal complaints handled? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.</td>
</tr>
<tr>
<td>J.5.</td>
<td>How do you make decisions about the need for confidentiality and protecting the anonymity of those involved?</td>
</tr>
<tr>
<td>K.1.</td>
<td>How is the governing body and management held accountable for fulfilling their strategic promises including on accountability?</td>
</tr>
<tr>
<td>K.2.</td>
<td>What steps have you taken to ensure that staff are included in discussing progress toward commitments to organisational accountability?</td>
</tr>
<tr>
<td>K.3.</td>
<td>What is your accountability report’s scope of coverage? Are you reporting for the whole organisation or just the international secretariat? For secretariats of international federations, on which issues of accountability (or relating to Accountable Now’s 12 commitments) do your members report to you on, and with what frequency?</td>
</tr>
</tbody>
</table>
Where there is no routine reporting, how do you use your coordinating functions to elevate attention to accountability issues throughout your federation?
Annexes

1. Partnership Framework for Implementing Partners
2. Global Fundraising Donations Acceptance Policy
3. Global Reward Policy
4. Anti-Fraud and Corruption Policy
We work with partners in low and middle income countries to eliminate avoidable blindness and promote equal opportunities for people with disabilities.

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