Accountable Now

GLOBAL STANDARDS LOCAL TRUST

**CBM International
Independent Review Panel Feedback**

Accountability Report 2019
Review Round January 2021

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Feedback from the Independent Review Panel
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Dear Dr. Rainer Brockhaus,

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

This is the first report by CBM International after the dissolution of the CBM Federation, which had reported using the Accountable Now framework for 10 years. The continued commitment to Accountability of CBM International is clear and demonstrated in several sections in the report.

The panel has highlighted as strengths CBM International's approaches to maximising coordination with other actors (D3), listening to stakeholders and acting upon their feedback (E3), safe working environment (H3), and ensuring privacy rights and protecting personal data (G3), which is considered good practice and will be sharing across members.

The panel has identified the following areas for improvement: Sustainability of your work (B1), responsible stewardship of the environment (C5), people's and partners' capacity development (E4), evidence regarding the root causes of the problems you address (F1), and stakeholders supporting your advocacy work and valuing changes achieved (F2). The feedback on these questions is summarised on the improvement analysis attached, which your next interim report should address.

The panel acknowledges the major effort required to reorganise CBM during the reporting period, and appreciates the efforts in producing this accountability report in the midst of the global pandemic.

We look forward to discussing our feedback with you in a follow-up call, which the Secretariat will be in touch to schedule. This conversation will form the basis for your

response letter, which will be made publicly available on the Accountable Now website along with your report and this feedback letter.

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

Yours sincerely,

Accountable Now's Independent Review Panel

CBM International's Accountability Report 2019
Review Round January 2021

Opening Statement from the Head of Organisation

The opening statement from Dr. Rainer Brockhaus, CBM-International CEO, explains the decision, and its rationale, of dissolving the CBM Federation. CBM Germany, the initial founder of CBM-International will merge back into CBM-International, and the Anglo-Saxon CBM members together with CBM Switzerland have formed, still in 2019, an independent federation under the name CBM Global Disability Inclusion.

The statement highlights the new organisational set up being better focused and more effective in delivering CBM's mission. Effective collaboration of relevant CBM structures in programming so that stakeholders can participate in decision making, oversight and accountability, together with closer connection between beneficiaries and the organisation are dynamic accountability tenets highlighted in the statement.

It would be quite understandable if the major effort required to reorganise CBM into CBM-I and GBM-G has limited the organization's capacity to advance some aspects of accountability.

CBM.org appears to show all data from all CBM organisations (in, for example, 'our work in numbers'. In future, will CBM-I and GBM-G have separate web sites with separate data?

Cluster A: Impact Achieved

A. The impact we achieve		
A1	*Mission statement and theory of change*	*3*

	CBM's vision and mission are presented. A link to a <u>dedicated site</u> explaining the 2023 strategy, is provided. The theory of change is described, focusing on the fact that "disability and poverty are inextricably linked" as rationale for CBM's efforts in the poorest communities. The main planned outcomes and strategic objectives are listed. The vision and mission statements are clearly presented. By contrast, the Theory of Change requires significant additional development to become meaningful as an expression of how CBM-I intends to achieve its outcomes. Starting conditions, assumptions, strategies, outputs, outcomes and causal pathways are not presented.		
A2	**Key strategic indicators for success** Key Performance Indicators (KPIs) have been developed to measure objectives in programmes, organizational finance, human resources, and internal processes. Objectives to programmatic and internal effectiveness, are listed. Also the objectives to quality, accountability, and compliance, are briefly described.	*2*	
A3	**Progress and challenges over the reporting period** The brief response addresses how the high numbers of KPIs and the intense process behind, might provoke a lack of focus in teams. As a result changes are being applied to the KPIs for 2020. KPIs are not included in or linked to the report as a previous IRP cover letter proposed. The report does not explain what challenges have been experienced with KPIs (other than being too process oriented) or how the organisation is addressing them, other than reducing their number. Also, it is mentioned that an improvement in quality, accountability, and collaboration with key internal stakeholders, has been reported in a survey conducted in May 2019. The panel recommends that CBM-I look at Sightsavers' approach to this question, which can be found in their <u>latest accountability report pp. 6</u>.	*2*	

A4	*Significant events or changes regarding governance and accountability*	2
	The changes already mentioned in the opening statement are further described. The CBM organisations new set up and relations among them are explained. Understandably, this report is very much taken up with the major organisational changes and does not discuss contextual changes within the disability/development/humanitarian sectors. The next report should pay more attention to shifts in context and sector-wide policy and funding landscape that influence CBM-I programming.	

B. Positive results are sustained

B1	*Sustainability of your work*	1
	Sustainability underlies the Programme Quality Framework, which supports achieving lasting change. It is stated that all projects in CBM "are regularly monitored and evaluated to document sustainability or challenges in achieving it". No details of the monitoring progress are provided, nor of how the process is being improved. No examples of monitoring reports are included/linked. CBM focuses on supporting local organisations to achieve lasting change. Partners' sustainability is assessed, and support is provided when needed by CBM. A project in Sri Lanka is provided as an example to illustrate CBM approach and impact. The report does not mention the 2018 evaluation synthesis report (mentioned in B2) findings on sustainability. While the synthesis report judges the relevance and effectiveness of CBM projects as 'very good', the evaluation team concludes that 'overall, sustainability of CBM's projects to show room for improvement'. The Evaluation Synthesis 2018 and the CHS Self Assessment both point to the need to improve exit strategies. The next CBM accountability report could usefully show whether/how the management has addressed these findings.	
B2	*Lessons learned in the reporting period*	2
	The report and the CEOs covering letter indicate that CBM has increased its evaluation activity, which is a welcome step in strengthening accountability, and responds to previous IRP comments. Several examples	

	are provided to show how CBM identifies and shares lessons learnt, such as active engagement in CSO networks, and generation and sharing of learnings from evaluations. However, B2 asks 'What lessons have been learned during the period?' The purpose is to highlight lessons learned rather than listing learning exercises that have taken place. The report is missing an explanation of how the lessons have been or will be used to improve work in future. It is a missed opportunity to show the value and benefit from the Meta Evaluation of 24 CBM projects and the CBM self assessment against the CHS 2017 (the latter is not mentioned in this report.) The next report could usefully highlight the results of the 2020 Synthesis of Country Mid-Term Reviews and the steps taken by CBM-I in response and cover how the results of future evaluations are being used to inform future practice.	
C. We lead by example		
C1	**_Excellence on strategic priorities_** CBM has decided to focus on two key thematic areas to excel: Inclusive Eye Health (IEH) and Community-Based Inclusive Development (CBID). The response lists some initiatives and commitments through which CBM demonstrates excellence. While the report provides a clear explanation of several processes used by CBM-I to demonstrate excellence, no examples or other evidence is provided to illustrate how excellence has been demonstrated.	*2*
C2	**_Expertise is recognised and welcomed by peers and stakeholders_** The report provides impressive examples of CBM contribution to several high level events and outcomes, where CBM has played an active role as an expert and advocate, for example the United Nations General Assembly (UNGA 74) where CBM participated as one of the key coordinators of the Stakeholder Group of Persons with Disabilities. Awards granted to CBM staff are also listed.	*4*
C3	**_Inclusivity, human rights, women's rights and gender equality_** The report references a comprehensive set of policies on rights, equality and inclusion, which are at the core of CBM-I's work. Accessibility and	*2*

	inclusion of persons with disabilities is ensured through a human-rights approach. Resources developed in a participatory manner are offered to staff. A couple of resources are shared: The Disability and Gender Analysis toolkit, and the CBM's Programme Quality Framework (PQF). The report does not explain how these policies are applied in practice, or any further planned developments in ensuring they are implemented For example, both the CHS self assessment and the Evaluation Synthesis refer to inadequate support for the development of staff skills and competencies. Policies and standards shared in previous reports are still in place and listed in the report. The next report could helpfully include links to all the relevant documents.	
C4	**_Minimising negative impacts on stakeholders_** Children and adults with disabilities are the groups CBM focuses its work on, and since they have a high risk of suffering violence, safeguarding is a key commitment for CBM. A new Children and Adults-at-Risk Safeguarding Policy across the organisation was rolled out in 2019. It requires that all staff and representatives adhere to the policy. Similarly CBM requires its partners to have a safeguarding policy. The Code of Conduct is publicly available and is applicable to all employees and third parties. Also, a link to a dedicated site to report safeguarding issues is shared. The next report would benefit from explanation of how partners are required or supported to implement these policies, which is lacking here. The Panel would also like to see in the next report, how minimising negative impacts on the most destitute people amongst the vulnerable groups is addressed (e.g. children, refugees, LGBTQ, Dalits).	_2_
C5	**_Responsible stewardship for the environment_** The Programme Quality Framework includes a commitment to "Environmental Responsibility" which seeks to minimise negative	_1_

environmental impact of CBM's operations and to pursue initiatives with a positive impact on the environment.

The response acknowledges the intersection of disability-inclusion and environmental factors and lists two initiatives CBM is involved with other actors addressing that intersectionality. According to the Programme Quality Framework, CBM-I is due to strengthen its attention to Environmental Responsibility by implementing an Environment Policy and Guideline, which could be referenced in the next report if complete.

The reporting omits quantitative reporting on CBM-I environmental performance, for example, its carbon footprint, or any plans to report such data or to improve environmental performance.

For reference, ChildFund New Zealand's latest report (pp. 17) provides a good example on reporting environmental impact of operations, and a strong approach to responsible stewardship of the environment.

Cluster B: Stakeholder Involvement

D. Key stakeholders are identified with great care

D1	**Key stakeholders and how they are identified** A comprehensive list of CBM stakeholders is included, being persons at risk of disabilities, their families and relevant organisations at all levels. The process for analysing and selecting particular stakeholders to engage with is not included and could usefully be described in the next report. Sightsavers' accountability report (pp. 16) explains several tools and processes to identify different types of stakeholders.	*2*
D2	**Reaching out to those impacted or concerned by your work** Inclusive project cycle management (iPCM), Disability-Inclusive Development and accessibility/universal design are mentioned as approaches or principles to ensure people with disabilities are involved through the project cycle. Advocacy work and empowerment of local organisations and individuals are also mentioned as ways to reach out to stakeholders.	*2*

	The report states that it follows Do No Harm principles. The CHS self assessment states that CBM risk assessments are not designed to assess 'if the humanitarian action could negatively affect or put at risk the communities'. Systems are not adequate to 'take into account potential negative effects' of CBM projects. The next report could usefully explain how CBM has responded to this finding. Also the Panel would like to understand how CBM-I responds to the different challenges faced by men and women with disabilities.		
D3	**_Maximising coordination with others operating in the same space_**	**_3_**	
	Five strategies employed by CBM to coordinate with other actors are briefly described, which seek coordination with Governments and other INGOs, and insights from DPOs. One of the strategies at project level mandates that a stakeholder analysis is done to identify other actors and potential opportunities for collaboration.		
	An example is provided on work with UNICEF and a local NGO in a Rohingya Refugee camp in Bangladesh, where CBM provided specific services to persons with disabilities, and also advised the other organisations how to make their services inclusive of children with disabilities.		
	CBM also supports organizations of persons with disabilities, so that their views and inputs are taken into consideration by actors that work with them.		
	The panel sees CBM-I's approach to maximising coordination with other actors as a strength.		
	E. We listen to, involve and empower stakeholders		
E1	**_Stakeholder feedback_**	**_3_**	
	A link to the recently launched 'Programme Feedback and Complaints Policy' is provided. The Programme Quality Framework, Partnership Principles, and Safeguarding Policy are also linked.		
	At organisational level, it is stated that a feedback mechanism is in place within the performance management system context, however the system		

	is not described. The relevant web page provides three avenues for feedback, as discussed at J3. The CEO's cover letter notes that this webpage has been improved since the last report. The Panel suggests that at an appropriate time CBM-I could consider a third party assessment of these frameworks and principles and their application.	
E2	**Stakeholder engagement** All CBM programmes are implemented through partners. A list of practices aiming at engaging stakeholders are provided. The report provides no evidence of what has been learned or improved in stakeholder engagement, beyond feedback mechanisms. The CHS self assessment notes that 'affected communities do not always feel they have equitable and safe opportunities to participate in programme decisions'. Has this been addressed in the period since this report?	*2*
E3	**Main likes/dislikes from stakeholders and organisation's response** It is stated that the new Programme Quality Framework (PQF) has been validated by an initiative to capture partner perceptions, which was conducted in early 2019. The main likes and dislikes from that initiative are listed, the dislikes being articulated as suggestions. This shows very positive evidence of CBM listening to its stakeholders. CBM has reacted to this feedback by increasing "efforts to approach partnership work in a sustainable and mutually beneficial way". A couple of documents are mentioned where the efforts are documented; Partnership Principles and Partnership Principles into Action. The report states that partner organisational capacity assessment is now more formally tied into programme planning. The response also addresses the previous feedback from the panel in the last full report. CBM has revised its approach to project planning to support partners on organisational development. The Panel sees CBM-I's approach to capturing and responding to stakeholders' feedback as a strength.	*4*

E4	**People and partners have gained capacities that last beyond your immediate intervention**	**1**
	The report states that this has been covered in B1 but no information of substance on capacity development is provided there, apart from the Sri Lanka example.	
	The panel suggests to look into CIVICUS' accountability report pp. 17-19 as an example of a strong response to this question.	

F. Our advocacy work addresses the root cause of problems

F1	**Evidence regarding the root causes of the problems you address**	**2**
	Evidence is gathered through programmatic work and the technical expertise present in CBM. Three questions are listed, which are key in prioritising CBM's advocacy work.	
	The response also outlines how the advocacy framework is set and the current focus on inclusion in several areas, such education and health. A comprehensive list of foundation and strategy documents is included, forming the basis of CBM-I advocacy positions, which are then focused on specific advocacy topics.	
	The report provides no explanation of how the process of the assessment of root causes works other than stating 'through programme work and technical expertise CBM gather evidence on root causes'.	
F2	**Stakeholders support your advocacy work and value changes achieved**	**1**
	As mentioned previously, CBM's programmes are implemented by partner organisations. People with disabilities are involved to ensure CBM advocacy work aligns with their needs and values.	
	The report does not explain how partners engage people with disabilities in advocacy messaging or how their representatives engage with the CBM advocacy team.	
	ChildFund New Zealand latest report (pp. 22-23) provides examples of engaging stakeholders in advocacy work.	

G. We are transparent, invite dialogue and protect stakeholders' safety		
G1	**_Availability of key policies and information on your website_** Links to the website sections "CBM in Numbers" and "CBM Worldwide" are provided, which include information such as annual budget and staff statistics. It is stated that "All CBM Policies are published online on CBM.org". Several policies are found using the search function on the website, however the policies are not easily found through organic navigation on the website. CBM became a member of IATI in early 2020.	**_2_**
G2	**_Pay scale, gender pay gap and top salaries_** There are 6 pay scales with 4 different seniority steps, which mirror the salary structure of the protestant church in Germany. Positions are evaluated according to this salary system. It is stated that this system avoids gender pay gap, but no data is provided. Data pay gap is not about equal pay for men and women on the same grades but the average salary for male employees compared with the average for females. This should be added to the next report. The salaries of the five most senior positions are provided. They are outside the salary system mentioned above. The ratio 3:1 between the top and bottom salaries is provided.	**_3_**
G3	**_Ensuring privacy rights and protecting personal data_** The GDPR is applied in CBM and there are internal and external data protection officers. CBM staff have signed a data protection and confidentiality agreement. They also receive data protection training and support from the IT department. The HR department personnel files are kept in lockable cupboards only accessible to employees in the HR department and all data in the Human Resource Information System is protected with individualised access rights.	**_3_**

	External providers processing personal data on behalf of CBM sign non-disclosure and data protection agreements. CBM privacy policy is easily found on the website and provides information on how the data is processed and on accountability. The CHS Self Assessment makes reference to shortcomings in safeguarding personal information. The next report could usefully explain how this finding was addressed. The CBM approach to data protection is considered **good practice**.	
G4	**_Largest donors and their contributions_** CBM finances its operations through contributions of the Member Associations. The five largest donors and their contributions of its major Member (CBM Germany) are provided.	*3*

Cluster C: Organisational Effectiveness

H. Staff and volunteers are enabled to do their best

H1	**_Recruitment and employment is fair and transparent_** It is stated the recruitment process is guided by the following CBM standards and policies: Code of Conduct, Safeguarding Policy and the Inclusion Policy. It also follows the "equality law (Allgemeines Gleichstellungsgesetz)". No information is provided on how well these processes are working. The Panel would be interested to hear how the organisation addresses diversity in recruitment including gender, disability etc.	*2*
H2	**_Staff development_** CBM encourages and provides its staff with training opportunities for professional development in diverse areas such as management and administration. a comprehensive staff development system has been developed recently but implementation was put on hold because of internal developments..	*2*

	The next report could usefully explain how staff development needs are identified and how these are related to performance assessments. Also the total investment in staff development across CBM-I as a percentage of the global budget.		
H3	**_Safe working environment_** CBM has a comprehensive set of policies and training related to ensuring a safe working environment. Sexual harassment, abuse, exploitation and other unacceptable conduct is addressed in CBM Code of Conduct as addressed in C4. Security Focal Persons or Country and Regional directors are at the front line managing incidents. A Global Health, Safety and Security Unit located in Bensheim and they can call upon the Crisis Management Team if needed. Beyond these, a cross functional team can be formed and contract external companies if further investigation is needed. CBM has a hotline outsourced to a global emergency assistance provider, which has security, medical and psychological staff on call 24/365. CBM provides Safety and Security trainings for women and for vulnerable people, incl. travellers with a disability. The panel commends CBM for the sound policy framework and general approach to _Safe Working Environment_ and flags the answer as a strength.	_3_
**I. Resources are handled effectively for the public good**		
I1	**_Resources are acquired in line with your values, globally accepted standards and without compromising independence_** The scope of the response is CBM Germany, which is holder of seal of approval of the German national regulatory body for accountability in acquisition of donations (DZI Spendensiegel). Compliance with the associated standards is regularly assessed by the DZI.	_3_
I2	**_Monitoring of progress and re-allocation of resources_**	_3_

	Progress on the implementation of the new strategy was monitored by the production of regular reports to be shared with senior and executive management level.		
	There are mechanisms in place to monitor and reallocate resources accordingly. There are formal reallocation procedures depending on the authority structure, and they require approval from funders.		
I3	***Minimising risk of corruption, bribery and misuse of funds***	**3**	
	It is stated that CBM minimises the risk by "limiting the amount of funds 'not needed' being held by partners", and through regular monitoring and escalation to senior management.		
	There are financial controls such the 'four eyes principle' and finance manuals are regularly updated.		
	The response mentions "relevant situations" but it is unclear whether any incident of corruption, or misuse of funds have been reported.		
	CBM institutionalised grant management procedures at partner level to help staff deal with the effects of staff turnover.		
	The next report could usefully comment on steps to ensure that reporting by partners is not delayed and the results of any improvement initiatives. It would also be helpful to explain more clearly how partners' surplus funds (not needed) are managed.		
	J. Governance processes maximise accountability		
J1	***Governance structure and recruitment of trustees/board members***	**3**	
	As of 2020, a new governance structure and bodies are in place and those are listed and briefly described in the report. The roles and responsibilities of the Assembly of Members and the Supervisory Board are also listed.		
	How members of these governances bodies are recruited or appointed are briefly described.		
J2	***Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes***	**3**	

	A committee for audit, risk and finance is established by the Supervisory Board. The latter also approves the annual budget, financial statements and the management report. The Supervisory Board also receives summary reports on child safeguarding, complaints, whistle-blower reports, and updates on key risks. The next report could helpfully explain how the Board manages risk (through for example, the risk register)	
J3	**_Complaints handling mechanisms and overview of complaints (external)_** A [dedicated section](#) on CBM website is linked. It offers 3 entry points for anyone to raise a complaint, report incidents of unacceptable behaviour, and to give feedback of any kind. These are: Programme Feedback and Complaints Mechanism, Whistle-blower System, and Safeguarding Incident Reporting System. Only the first one offers a physical postal address in addition to the online reporting. Related policies are linked in the dedicated site. The 3 "major complaints" received in the reporting period are listed.	_3_
J4	**_Complaints handling mechanisms and overview of complaints (internal)_** The report provides a clear summary of complaints and feedback mechanisms, and statistics concerning complaints received. The policies and processes related to external complaints are also applicable for internal ones. Additionally there is a dispute resolution process for internal complaints run by the HR department. It is stated that cases "below the International HR department are not recorded", unless they escalate. In the reporting period no cases were escalated and no cases were reported at CBM Germany.	_3_
J5	**_Protecting confidentiality and anonymity of those involved in complaints_** The response explains that when a complaint is raised the related information is managed by a team which members are trained to handle feedback and details are securely filed and only shared on a need to	_3_

know basis. It is also noted the whistle-blowing system provides a channel for raising complaints anonymously. It is stated that CBM also encourages project participants to provide feedback informally. The function of the Investigations team is clearly important. Ideally the next report could provide more information on the functioning of this team.	

K. Leadership is dedicated to fulfilling the 12 Commitments

K1	***The governing body and management are held accountable for fulfilling strategic promises*** It is briefly explained how staff performance is monitored and assessed against key performance objectives, and how management and governing bodies are informed about it. The next report should rather address how the performance of the board and management-level staff is assessed, particularly on strategic aims and goals, and accountability issues. Are there annual performance reviews? Do these include self-assessment, 360 degree reviews, etc?	*3*
K2	***Inclusion of staff in discussing progress toward organisational accountability*** The response briefly mentions accountability being discussed in some internal forums such staff meetings and newsletters and staff being involved in producing the accountability report according to their area of expertise. The annual accountability report and the Panel's feedback are shared and discussed with staff.	*3*
K3	***Scope of this accountability report and influence over national entities*** The scope of the report is CBM-International, which consists of offices in Bensheim and Berlin in Germany, Brussels in Belgium, and New York in USA, as well as regional and country offices. In section A4, the report states that CBM Italy will work closely with the newly merged CBM-International. CBM Italy is not within the scope of this report, which leaves open the question of whether CBM Italy can be	*3*

	covered here in future under the banner of CBM-I, or whether CBM-Italy will join Accountable Now as a separate entity.	