



**Accountable
Now**

GLOBAL STANDARDS LOCAL TRUST



ChildFund Australia Independent Review Panel Feedback

Accountability Report 2019-2020

Review Round March 2021

Accountable Now · www.accountablenow.org ·

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ChildFund Australia

Feedback from the Independent Review Panel

Review Round March 2021

29 March 2021

Dear Margaret Sheehan,

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.

ChildFund Australia's second accountability report fully addresses most of the questions and emphasises the role of M&E as a driver for continuous learning and improvement. The report demonstrates that ChildFund Australia has robust systems that form a solid accountability framework.

The panel has noted the following sections of the report to be **particularly strong**; ensuring gender equality and inclusion of people with disabilities in its programs (C3); the approach to addressing feedback with stakeholders and to closing the feedback loop (E3); addressing root causes and the Child-friendly Accountability Initiative (F1 and F2); the external [online reporting mechanism](#) (J5); and the approach to consent and the 'Where Does My Story Go?' document (I1), which is flagged as a **good practice** to be shared with other Accountable Now members.

The panel has noted in several sections where more information on how the systems and policies work in practice would have helped to understand what outcomes the accountability framework is achieving. Key **areas for improvement** are; information on whether ChildFund Australia has achieved the goals set out in its 2015-2020 plan (A3); sustainability of your work (B1); and responsible stewardship of the environment (C5).

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



ChildFund Australia's Accountability Report 2019-2020 Review Round March 2021

Opening Statement from the Head of Organisation

The opening statement by ChildFund Australia's CEO Margaret Sheehan, emphasises the continued commitment to accountability as an essential component of ChildFund Australia's work. It starts by reflecting on the impact of the pandemic on the vulnerable communities and how ChildFund Australia's quick reactions has helped to mitigate it.

The organisation's re-accreditation process with the Australian government's Department of Foreign Affairs and Trade (DFAT) was highlighted as an opportunity for learning and development that strengthened accountability practices within ChildFund Australia.

The other significant event highlighted was work on ChildFund Australia's Strategic Plan 2020-2024, which began in late 2019. However, as the pandemic unfolded, it was agreed to pause the process and instead replace it with a set of "interim Strategic Directions 2020-2021" instead.

Finally, ChildFund Australia commits to embed Accountable Now framework into its operations.

Cluster A: Impact Achieved

A. The impact we achieve

A1	Mission statement and theory of change	4
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	<p>ChildFund Australia's vision and mission were revised in 2020 to better reflect the child-centred approach taken to development by the organisation. These, along with the theory of change - based on the various drivers of poverty that ChildFund Australia work to address - were shared in the report.</p>	
A2	<p>Key strategic indicators for success</p> <p>For the reporting period, ChildFund Australia's strategic indicators are still derived from their 2015-2020 strategic plan, which had five strategic goals. The Strategic Directions 2020-2021, which were developed in consultation with the leadership teams across the organisation, identifies four priorities and 12 KPIs. Notwithstanding this, no information was provided as to whether or not ChildFund Australia achieved the goals set out in its plan. With regards to this, the panel would like to know whether there is an intention to carry out a review of the results for the period 2015-2020 and compare it against its strategic plan for the same period. And regarding the Strategic Directions, how was ensured children and communities' voices informed the priorities?</p>	3
A3	<p>Progress and challenges over the reporting period</p> <p>Progress and challenges are described mostly in qualitative terms for the five strategic goals. Substantial progress is reported for directing efforts to children in the Asia-Pacific region, and on diversifying revenue. The Covid-19 poses a challenge in sustaining progress on refocusing programs to respond to children's changing needs. ChildFund Australia is shifting towards more projects implemented with other CSOs and INGOs.</p> <p>See also comments made in A2 above regarding whether ChildFund Australia achieved the goals set out in its 2015-2020 Strategic Plan.</p>	3
A4	<p>Significant events or changes regarding governance and accountability</p> <p>From an executive management perspective, Margaret Sheehan was appointed as new CEO, starting in December 2019. Changes to the board - which had met seven times during the reporting period - were also outlined.</p>	4



	<p>From a strategy and policy perspective, an interim strategic direction was adopted (see A2 above) as were the following revised policies: Child Safeguarding Policy, and Gender and Inclusion Policy.</p> <p>Challenges provoked by the Covid-19 pandemic were also outlined, as well as ChildFund Australia's reactions and changes to them. An example of this was the update of Security Management Plans across all Country Offices.</p>	
B. Positive results are sustained		
B1	<p><i>Sustainability of your work</i></p> <p>A program Handbook documents minimum requirements on sustainability throughout project cycles.</p> <p>ChildFund Australia's approach to sustainable outcomes is based on an understanding on the fundamental link between sustainability and local capacity, the latter including strength of local governments and civil society.</p> <p>ChildFund Australia's commitment to sustainability is reflected in sector change models. Examples on Health Program Sector Change Model and on Education Sector Change Model are provided to illustrate the approach.</p> <p>Notwithstanding this, the panel would welcome details of the actual sustainability achieved in its programs and projects, as the majority of the details provided are around 'how' sustainability is achieved.</p>	3
B2	<p><i>Lessons learned in the reporting period</i></p> <p>A Program Effectiveness report was produced for the first time in 2020. It focused on the quality, accessibility, or responsibility of formal systems to the communities ChildFund Australia serves, and how it was developed is explained. A clarification however on why the report focused on "formal systems" (and whether this was a scope limitation) would be appreciated.</p> <p>Key Learnings are listed and briefly described, some of them involving dynamic accountability practices such as collaboration and capacity</p>	3



	<p>sharing within partnerships and consortia. Challenges are also summarised.</p> <p>It was noted that the Program Effectiveness report had been shared within the organisation (and a management response is being developed to identify action and address findings), but sharing key learnings externally is still being considered. The panel would like to understand what criteria is assessed to decide whether the report should be shared with external stakeholders as well.</p> <p>In question E4, the ChildFund Nonghet Program Operational and Impact Evaluation 2010-2020 is shared. It includes lessons learned and good practices.</p>	
C. We lead by example		
C1	<p>Leadership on strategic priorities</p> <p>The response refers to a number of national and regional networks and coalitions in which ChildFund Australia play a leadership or an active role, in particular ACFID and ARNEC. It is also active within the ChildFund Alliance itself.</p> <p>As requested by the panel, ChildFund Australia's role within the ChildFund Alliance is provided, including contributions to Taskforces and Committees.</p>	4
C2	<p>Expertise is recognised and welcomed by peers and stakeholders</p> <p>The response highlights ChildFund Australia, being accredited with the Australian Department for Foreign Affairs and Trade (DFAT) and is a member of ACFID.</p> <p>Several examples where ChildFund Australia's expertise has been recognised and welcomed, are provided, such as the launch of a publication Child Online Safety.</p>	4
C3	<p>Inclusivity, human rights, women's rights and gender equality</p> <p>The UN Convention on the Rights of the Child is the reference point for ChildFund Australia's work. Key documents reflecting ChildFund Australia's commitment to human rights and equality are listed, among</p>	3



	<p>them the publicly available Gender and Inclusion, Disability Inclusion (updated in June 2020), and Gender policies are linked.</p> <p>ChildFund Australia is committed to a twin-track approach to ensure that programs are inclusive of people with disabilities. An example is provided to illustrate the incorporation of disability inclusive practices in its project proposal and project design. ChildFund Australia has engaged CBM to provide training to country offices and partner staff, and is increasingly working with DPOs to ensure the voices of people with disabilities are heard and their perspectives included through the project cycle.</p> <p>The response also outlines the commissioning of several external consultants to assess ChildFund Australia's gender equality and disability inclusion practices.</p> <p>The panel commends ChildFund Australia for its commitment to ensure gender equality and inclusion of people with disabilities in its programs, and see the approach as a strength in the report.</p>	
C4	<p><i>Minimising negative impacts on stakeholders</i></p> <p>ChildFund Australia has a policy framework, supporting procedures, training and regular assessment to minimise negative impact on stakeholders. Eight relevant policies and procedures are publicly available and linked, among them the Organisational Code of Conduct, Child Safeguarding Policy, and PSEAH Policy.</p> <p>All staff and partners are being given trainings on Child Safeguarding and Protection and PSEAH, and these trainings are also incorporated into ChildFund Australia's onboarding process for new staff.</p> <p>The response also highlights the regular risk assessments and reviews carried out at different levels in the organisation, which include a contextual analysis of risks related to discrimination, violence, abuse, exploitation and neglect and that identifies relevant mitigation measures. The Panel commends the strong policy framework and its supporting processes.</p>	3
C5	<p><i>Responsible stewardship for the environment</i></p>	2



	<p>The recently approved and updated Environmental Sustainability Policy is publicly available, and it commits to addressing environmental impacts of ChildFund Australia's operations and environmental sustainability in projects.</p> <p>Three key initiatives taking place during the reporting period are described, one of them is a <i>Green Audit</i> at the Sydney Office which provided a baseline of ChildFund Australia's Sydney Office carbon emissions.</p> <p>While the panel see's these developments as positive, it would be interested in hearing about the outcome and impact of the various initiatives implemented.</p>	
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Cluster B: Stakeholder Involvement

D. Key stakeholders are identified with great care

D1	<p>Key stakeholders and how they are identified</p> <p>ChildFund Australia's various stakeholders are listed - the key group being children, young people, their caregivers and communities.</p> <p>ChildFund Australia's geographic areas of operation are driven by contextual factors and examples to illustrate the approach are shared.</p> <p>The response also explains gender is mainstreamed across projects but also there are programs specifically addressing gender inequality.</p> <p>In the previous report ChildFund Australia outlined the methods and tools used to identify stakeholders, including needs and situational analyses, stakeholder mapping, national and regional consultations, workshops, and referrals. The panel asks again more details and examples to provide a better overview of how this works in practice.</p>	3
D2	<p>Reaching out to those impacted or concerned by your work</p> <p>ChildFund Australia is committed to a participatory and inclusive approach at each stage of the project cycle. Several tools and guidance, such as gender and disability tools, are available internally in a Program Handbook. Examples from two projects (both in Vietnam) are</p>	4



	provided to illustrate the approach followed during the design and implementation phases.	
D3	<p>Maximising coordination with others operating in the same space</p> <p>ChildFund Australia engages with national and local governments through country offices to gain approvals to work in a geographic area, coordinate, and/or implement project activities. An example is provided to illustrate this approach.</p> <p>The response also lists coordination and working groups in which ChildFund Australia was involved in during the reporting period, such as the INGO Forums in Papua New Guinea and in Myanmar, and groups working in Covid-19 responses. The aim is to avoid duplication of activities, ensure working towards identified gaps, and being able to benefit from the expertise of their peers.</p> <p>Partnership Agreements include obligations related to a wide range of policies and procedures such as anti-corruption and child safeguarding. Partners are offered support to bridge gaps when needed.</p> <p>ChildFund Australia's role in partnerships can include coordination, capacity building and/or providing technical expertise, depending on contextual factors, which are reviewed periodically. Specifically when engaging with local implementing partners and capacity limitations exist, ChildFund Australia's role is a supporting and capacity building one, and this obligation is detailed in the Program Partner Engagement Policy.</p>	3
E. We listen to, involve and empower stakeholders		
E1	<p>Stakeholder feedback</p> <p>The response explains that, at programme level, ChildFund Australia's Country Offices team are responsible for ensuring engagement with local communities and partners.</p> <p>At Community level, stakeholders are involved through online tools, individual and focus groups interviews, and workshops. Partners and</p>	3



	<p>Senior Management teams discuss and act to respond to critical issues. Examples of direct feedback mechanisms in Vietnam and Timor-Leste are provided.</p> <p>At partner level, one to one communication channels are the norm. Also, an annual survey has been introduced in 2020 as an additional opportunity for partners to provide feedback. Training on the Complaints and Whistleblowing policies was provided to partners. An example is provided to illustrate ChildFund Australia's approach to responding to partners' feedback.</p> <p>The approach to enable feedback from staff internally is also described and an example provided.</p>	
E2	<p>Stakeholder engagement</p> <p>The report states that stakeholders and partners are engaged in frequent and periodic dialogue throughout the project cycle and that program management processes are participatory and inclusive. The publicly available Child and Youth Participation Policy guides ChildFund Australia's engagement with its key stakeholder group.</p> <p>A detailed example features the 'Inspiring Youth Changemakers' project in Timor-Leste, which illustrates ChildFund Australia's approach to stakeholder engagement at different project cycle phases.</p>	3
E3	<p>Main likes/dislikes from stakeholders and organisation's response</p> <p>The response outlines the main feedback received from each of its key stakeholders: children and communities, partners, and donors. It also provides examples illustrating how ChildFund Australia responds to feedback, aiming to close the feedback loop.</p> <p>The panel commends ChildFund Australia for the openness and approach to address feedback with stakeholders and to closing the feedback loop. This is considered a strength in the report.</p>	3
E4	<p>People and partners have gained capacities that last beyond your immediate intervention</p>	4



	<p>The response explains that ChildFund Australia implements a variety of projects which focus on increasing the voice, agency, and power of community members. Integral to this is their Monitoring, Evaluation and Learning Framework and accompanying reporting processes which seek to generate discussion, learning and decision-making to improve the effectiveness and bring about better outcomes for beneficiaries.</p> <p>An example of a project in Cambodia illustrates ChildFund Australia's approach and how less favored groups were able to increase self-confidence.</p> <p>Child Fund Australia has a Partnership Toolkit, which includes guidance on assessing partner capacity, developing capacity-strengthening plans and monitoring progress. Institutional capacities are also addressed, and an example of this support for a Cambodian partner, is provided.</p>	
<p>F. Our advocacy work addresses the root cause of problems</p>		
<p>F1</p>	<p><i>Evidence regarding the root causes of the problems you address</i></p> <p>The new Advocacy Policy statement setting out ChildFund Australia's approach to advocacy is shared. It highlightings the focus on drivers and root causes, and on understanding key structural barriers and defining social norms. ChildFund Australia's advocacy tools are listed, including contextual and situational analyses and ethical empirical research.</p> <p>The approach to research, which informs program design and advocacy, is participatory and evidence-based. Research on online safety in the Pacific is given as an example of how ChildFund Australia's research supports advocacy activities. The resulting report is publicly available.</p> <p>The panel considered the approach to addressing root causes as a strength.</p>	<p>3</p>
<p>F2</p>	<p><i>Stakeholders support your advocacy work and value changes achieved</i></p>	<p>3</p>



	<p>ChildFund Australia's participatory and inclusive approach to advocacy ensures that key stakeholders support the organisation's advocacy work. ChildFund Australia participates in ChildFund Alliance's Child Friendly Accountability initiative, which sees children involved in identifying problems and solutions, and participating in discussions with decision-makers about the issues that concern them.</p> <p>An example illustrating engagement with supporters (ReThink Orphanages) is also provided.</p> <p>The Panel notes positively the Child Friendly Accountability initiative and ChildFund Australia's approach to this issue is flagged as a strength.</p>	
<p>G. We are transparent, invite dialogue and protect stakeholders' safety</p>		
<p>G1</p>	<p>Availability of key policies and information on your website</p> <p>ChildFund Australia has a Transparency Statement, which outlines the commitment to transparency in all activities.</p> <p>The response explains how information is distributed via different channels and to several stakeholders. The following organisational policies are publicly available on its website: Complaints Policy, Privacy Policy, Prevention of Sexual Abuse and Harassment Policy, Whistleblowing Policy and Child Safeguarding Policy. Some information is available in children-friendly formats.</p> <p>Institutional and statistical information, including Board and Executive Team composition, is available in its Annual Report. The website also hosts audited annual reports and financial statements, strategic plan, and information on ChildFund Australia membership of Accountable Now, among other information.</p> <p>ChildFund Australia also uses other digital platforms to reach out to local stakeholders and key policies are available in local languages.</p> <p>The panel commends ChildFund Australia for preparing documents in a child-friendly format.</p>	<p>3</p>
<p>G2</p>	<p>Pay scale, gender pay gap and top salaries</p>	<p>3</p>



	<p>The results of a gender pay gap analysis are presented with a table depicting ratios for the Sydney and Country Offices. The analysis showed no systematic gender pay gaps for most of the offices. In the two offices that did show a gender pay gap, targeted recruitment and annual remuneration reviews are planned to close those gaps.</p> <p>A new 'graded' salary system has replaced the previous system which was based on an individual benchmarking approach.</p> <p>The Executive Team in Sydney is composed mostly of women (5 out of 6) and the ratio between lowest and highest salary in the organisation is 1:5.</p>	
G3	<p><i>Ensuring privacy rights and protecting personal data</i></p> <p>ChildFund Australia has a Privacy Policy, which addresses the requirements of the Australian Privacy Principles (APPs). A Privacy Collection Notice further describes the information collected about supporters.</p> <p>Measures to ensure control on access to digital and physical data are in place. The response also outlines improvements and strengthening of the protection of personal data, and security protocols which are built for prevention.</p> <p>The Panel commends ChildFund Australia on their strong approach and their commitment to keep improving their practices.</p>	4
G4	<p><i>Largest donors and their contributions</i></p> <p>ChildFund Australia's top five donors are listed, together with the monetary value of their contributions. The largest donor is the Australian Government Department of Foreign Affairs and Trade, while others are ChildFund Alliance members and the EU.</p> <p>The report states that the majority of funds come from institutional donors and Alliance members, but that there are some anonymous private donors (the amounts are usually under 20,000 AUD). The report lists the</p>	3



	safeguards that are in place to ensure anonymous contributions do not have undue influence over activities.	
<h2 style="color: white; background-color: #00838f; padding: 10px;">Cluster C: Organisational Effectiveness</h2>		
<h3 style="color: #00838f; background-color: #e0f2f1; padding: 5px;">H. Staff and volunteers are enabled to do their best</h3>		
H1	<p>Recruitment and employment is fair and transparent</p> <p>The response outlines developments during the reporting period aiming at strengthening the fair recruitment and employment process: Recruitment Standards including recruitment training and a question library, an Organisational Diversity roadmap, Leadership training, Employee engagement survey, and roll out of Value System (Infographic provided).</p> <p>An overview of the composition of staff per country, including factors such as gender, age, foreigner and disability is provided.</p>	3
H2	<p>Staff development</p> <p>The response explains how training needs are identified and how those are addressed. When possible, for broad training needs, training is developed and delivered in-house to strengthen a common understanding and to tailor the intervention to the specific internal need. Available trainings are listed. Other resources such as a Learning Library and a platform with short online learning videos on wellbeing, are listed.</p> <p>A revamped performance management was rolled out in all offices placing greater emphasis on linking goals and development actions. The process is explained, and the response is open about some staff being frustrated when teams and managers do not take ownership of the process. Options are being explored to overcome this challenge.</p> <p>Is the number of people/staff trained being tracked? In future reports, it might be interesting to reflect on the ratio of staff accessing to developmental opportunities in the form of trainings.</p>	3



H3	<p>Safe working environment</p> <p>The response mentions the Workplace Health and Safety (WHS) policy, focal points and a new Employee Assistance Program was introduced during the reporting period. ChildFund Australia's HR policies and procedures are aligned with national regulatory requirements</p> <p>Two independent reviews, on Child Safeguarding & PSEAH, and on Gender & Inclusion policy took place in the reporting period. Recommendations from the reviews are briefly outlined.</p>	3
I. Resources are handled effectively for the public good		
I1	<p>Resources are acquired in line with your values, globally accepted standards and without compromising independence</p> <p>ChildFund Australia has a Corporate Engagement Policy which incorporates a Due Diligence Process that explains how they decide whether or not to accept donations from organisations. While positive, it was noted that the policy appears to relate to "corporations and businesses" only, and does not cover donations or resources received from individual donors or non-commercial organisations. A review of the due diligence process shows it to be silent on the issue of probity/integrity checks regarding a partner's potential links to unethical and/or corrupt behaviour including money laundering and/or terrorism financing.</p> <p>ChildFund Australia also adheres to the ACFID Fundraising Charter and the Fundraising Institute of Australia's Principles and Standards. ChildFund Australia conducts regular training sessions for their staff and staff of suppliers to ensure they are aware of ChildFund Australia's obligations under these (though no details were provided as to whether any were carried out during the reporting period). There is also a requirement for policies and training to be in place for face-to-face street fundraising, around fundraising and vulnerable people.</p> <p>ChildFund Australia also has a procurement policy which expects procurement to be conducted in a transparent and accountable</p>	3



	<p>manner, and for staff to act ethically, including dealing with any conflicts of interest, not accepting gifts and not entering into unethical or unsafe contracts.</p> <p>The Consent Policy considers multiple scenarios, including child sponsorship programs and when collecting images. A so-called 'Where Does My Story Go?' document, which provides clear examples on how an individual's story might appear in communications materials, has been developed and translated into local languages. This document also aims to offer children and youth opportunities to enhance media literacy, by explaining and advising in options to share their story while protecting their identity. Training on informed consent is provided to staff.</p> <p>The panel commends ChildFund Australia for putting children at the center and enabling them to provide informed consent on the use of their stories and images. This is flagged as a good practice.</p>	
12	<p>Monitoring of progress and re-allocation of resources</p> <p>The response explains that progress against the strategic plan is reported to the Board at regular Board and/or Board Committee meetings, with a full review of progress, including against all KPIs, conducted annually by the Board. The Panel however would like more details as to the internal processes that management uses to monitor progress.</p> <p>It is stated that strategy and resourcing is adjusted in response to changing conditions, trends, and internal or external factors, and in 2020 the Covid-19 pandemic has driven a shorter-term strategy which allows pivot activities to respond to Covid-19.</p>	3
13	<p>Minimising risk of corruption, bribery and misuse of funds</p> <p>ChildFund Australia's approach is underpinned by a Fraud and Corruption Prevention and Awareness Policy which outlines the responsibilities of staff, and the controls and procedures in place to mitigate the risk of fraud.</p> <p>Fraud risk is assessed at organisation, partner, and project level and is regularly reviewed. There are a number of basic financial management</p>	3



	<p>controls in place, including segregation of duties, delegation of authority, and payment controls. Regular anti-fraud and corruption awareness training is given to staff and partners, to ensure they are familiar with relevant policies and procedures (though no details were provided as to whether any were carried out during the reporting period). Assurance activities are undertaken to check that controls and processes are working - this includes annual independent audits in each office, and an internal audit review plan (though again details of these for the period under review were not outlined in the report). The ChildFund Australia Board's Audit, Risk and Governance Committee has oversight of the findings. In the case of incidents of fraud, the report indicates that they were investigated and action taken in line with the policy, which can include disciplinary action, recovery of funds and reporting the incident to donors. ChildFund Australia aims to learn from findings, and to implement control measures to minimise the risk of incidents recurring.</p> <p>The response outlines four fraud cases reported in the past two years and how action was taken in line with policy and procedure. As a result, the internal control system and process has been strengthened.</p> <p>Based on the information provided, the panel feels ChildFund Australia's approach to the topic to be fairly robust.</p>	
<p>J. Governance processes maximise accountability</p>		
<p>J1</p>	<p>Governance structure and recruitment of trustees/board members</p> <p>The ChildFund Australia's Constitution explains the appointment and termination of Board Directors. A Directors Handbook provides guidance on the identification and recommendation of candidates to join the Board. The guidance states that every effort should be made to ensure the Board has the necessary skills and experience to adequately discharge its duties - a suggested list of skills and attributes is included. The Board maintains an up-to-date register of its current skillset, gender, age and diversity which it then uses as a reference point to inform and guide its recruitment process.</p>	<p>4</p>



	<p>The response explains ChildFund Australia's role and how it is represented in the ChildFund Alliance.</p> <p>An overview of the governance structure in general was not provided here, could it be shared in the next report?</p>	
J2	<p>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</p> <p>ChildFund Australia's Board reviews and approves all new organisational policies as well as substantive amendments to existing policies. These are discussed at Board sub-committee meetings before going to the full Board for approval. The Board monitors compliance against policies and procedures by reviewing assurance activities including the findings of annual independent audits, internal audit reviews, and monitoring and evaluation activities at programme and project level. Regarding resources, the Board approves the annual budget and monitors performance and resource use at each sub-committee and Board meeting.</p> <p>There is a bi-annual review of organisation risks, and the Board is presented with an organisational risk register as well as the actions being taken to mitigate these risks.</p> <p>Complaints and grievances are reported to the Board at each Board meeting, and any significant issues that arise can be shared with the Board outside of regular reporting timelines if required.</p> <p>The internal audit process and visits to country offices allow for periodical checking of compliance.</p>	3
J3	<p>Complaints handling mechanisms and overview of complaints (external)</p> <p>ChildFund Australia's Complaints Policy and the dedicated site are not mentioned here but they are available online.</p> <p>Reporting and responses mechanisms are validated by the communities and people ChildFund works for and with at program and projects</p>	3



	<p>locations. Compliant policies are explained using mixed methodologies ensuring access to information by different groups.</p> <p>Staff and partners receive relevant training. Different communication channels such as email signatures or community meetings are used to reinforce the reporting pathways.</p> <p>A table outlining complaints by category during the reporting period is provided, though no details were provided as to what portion of the complaints were validated as being genuine. A general outline on how complaints were treated is also provided.</p>	
J4	<p>Complaints handling mechanisms and overview of complaints (internal)</p> <p>The scope of the Grievance Policy are claims with regard to employment matters or ChildFund policies adversely affecting employees, interns and volunteers. The Whistleblowing Policy provides an alternative reporting mechanism for serious concerns.</p> <p>The Panel notes positively the fostering of an open feedback culture and the encouragement to try to solve issues before escalation. In the next report, could data be provided on grievances cases during the reporting period?</p>	3
J5	<p>Protecting confidentiality and anonymity of those involved in complaints</p> <p>The response states that confidentiality and the protection of the complainant and of survivors guide the handling of all complaints raised through ChildFund Australia's mechanisms. ChildFund Australia has also implemented an external online reporting mechanism which allows whistleblowers to communicate (and discuss) their concerns anonymously. The panel feels this to be a good practice.</p> <p>When incidents are reported, ChildFund Australia endeavours to protect the complainant's identity, unless the complainant wishes to be identified, or disclosure is required by law or necessary to further the investigation. This is particularly the case regarding criminal offences.</p>	4
K. Leadership is dedicated to fulfilling the 12 Commitments		



K1	<p><i>The governing body and management are held accountable for fulfilling strategic promises</i></p> <p>The ChildFund Australia Board conducts a formal review and assessment process, which includes interviews by the Deputy Chair, every four to five years, and its findings are followed by the Governance Working Group. The Board meets six times a year and it has subcommittees with their own responsibilities and Charters.</p> <p>The Board holds management to account by monitoring progress on the strategy. The CEO undertakes a performance review process with the Chair annually.</p> <p>Can ChildFund Australia share any key findings from Board and CEO reviews, and any action taken in response?</p>	3
K2	<p><i>Inclusion of staff in discussing progress toward organisational accountability</i></p> <p>Previous Panel's feedback was discussed with staff, who have also been included in consultations for the production of the report.</p> <p>The response outlines initiatives over the reporting period that sought to empower and include staff in key decision making processes. These included several regular meetings to discuss organisational systems relevant to accountability.</p>	2
K3	<p><i>Scope of this accountability report and influence over national entities</i></p> <p>The report covers ChildFund Australia and the Country Offices they directly manage (these are listed). It does not represent the ChildFund Alliance or Secretariat.</p> <p>The panel would like to understand the coordination and reporting (including frequency) that is in place between ChildFund Australia and its various Country Offices.</p>	2