



**Accountable  
Now**

GLOBAL STANDARDS LOCAL TRUST



# **Sightsavers Independent Review Panel Feedback**

Accountability Report 2018-19  
Review Round August 2020



# Sightsavers Feedback from the Independent Review Panel

## Review Round August 2020

21st August 2020

Dear Caroline Harper,

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.

Sightsavers' 9th Accountability Report is detailed and comprehensive, with a clear explanation of how many of the Sightsavers substantial set of accountability mechanisms work. The report states that it has captured the state of accountability across the network (with a few exceptions) including Sightsavers seven subsidiaries.

Areas of particular strength in the report include: The description of key strategic indicators for success and the SIM Card (A2); comprehensive and up to date set of evaluation reports published on a dedicated web page. Also detailed reporting against IATI standards with transparent display of data on separate web pages (B2/E3); safeguarding policy which is extended to partners; comprehensive list of organisational policies related to accountability (C4); the programme partnership policy, supported with examples (D3); the systematic attention to capacity development and exit strategies; the Accessibility Standards and Audit pack (E4); Sightsavers has been awarded the UK HMG cyber essentials certificate (G3). Hiring locally with focus on fair employment for people with disabilities (H1); anti-fraud and corruption policy, with mandatory e-learning package (I3).

Some of the explanation of the accountability mechanisms is descriptive rather than analytical. Practical examples are included in places but elsewhere the report would be improved by discussing more systematically the lessons learnt and changes made by the organisation using the results from the organisation's impressive set of accountability mechanisms.

In some cases, the accountability framework questions are not answered. These are highlighted in the Panel members' comments. Overall, Sightsavers' self-assessment scores (pp35-37) are significantly higher than those of the Panel. It is not unusual for the AN member self-assessment to be slightly more positive than the Panel's scores. However, in this case, we are concerned that the high scores, with 33 self-assessments at the highest level of '4', which comes across as lack of self-criticism.



Specific areas for improvement include: Aspects of inclusivity such as sexual orientation, age, ethnicity, or minority groups in the contexts Sightsavers works in (C3); internal complaints (J4); how the council is self-evaluated (K1). These three sections should be the focus of the next interim report.

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





# Sightsavers' Accountability Report 2018-19

Review Round August 2020

## Opening Statement from the Head of Organisation

The opening statement by CEO, Caroline Harper, indicates how the Covid-19 pandemic has affected the organisation in various ways, from programmes being paused, to the need for infrastructure to support remote working. The panel notes positively the reflection on the risk of the mobility restrictions negatively impacting disabled people's ability to participate in Sightsavers' work.

The statement describes the main areas of focus over the reporting period such as working more closely with partners for advocacy work and the strategy refresh work.

The report refers back to the areas for improvement identified by the panel in the previous report and is open about challenges and the progress made on them. It also makes specific references to ensuring the voices of poor people with disabilities are heard, and to building new partnerships to extend reach. Understandably, given the current operating context, the opening statement makes a number of statements about the impact of Covid-19.

## Cluster A: Impact Achieved

### A. The impact we achieve

A1	<p><b><i>Mission statement and theory of change</i></b></p> <p>Sightsavers' vision and operational aim are presented. Four thematic areas have their own strategies, overall there is a focus on working in partnership to increase impact, and it is appropriate that more weight is being given to MEL and research.</p> <p>Theory of Change is not discussed. It would be helpful to list the four change themes here (as in C1 below) and to summarise the theory of change for each (or append or provide a web link to the TOCs).</p>	3
A2	<p><b><i>Key strategic indicators for success</i></b></p> <p>Sightsavers continues to use its <a href="#">SIM card</a>, which the Panel previously identified as an example of <a href="#">good practice</a>, to track progress against its</p>	4



	<p>strategy, with organisational objectives at beneficiary level as well as objectives focusing on partnerships, advocacy, and strategic alliances. This is an outstanding example of an AN organisation working to devise its core indicators and providing a transparent display of data sources.</p> <p>Sightsavers' key stakeholders were involved in the process of developing these objectives, and as the indicators are being refreshed disabled people's organisations (DPOs) will be consulted. It is not clear which indicators Sightsavers sees as priority additions for future reporting and it would be helpful for the next report to discuss developments in this area. We suggest that for the next report, it would be helpful to append the excellent report against the SIM indicators already available in the Sightsavers annual report (e.g. pp20-22 of the 2018 annual report).</p> <p>Key internal policies and procedures guiding Sightsavers' engagement with different stakeholder groups are also mentioned, and a <a href="#">link</a> to them is provided.</p>	
A3	<p><b><i>Progress and challenges over the reporting period and difficulties encountered against the indicators</i></b></p> <p>Performance results against SIM card indicators are publicly available on Sightsavers' <a href="#">SIM card dashboard</a>. Overall, Sightsavers has achieved excellent results and areas for improvement in 2018-19. The Panel commends Sightsavers on the high percentage (96%) of countries and relevant teams that Sightsavers works with, which are actively participating in international or in-country processes to influence change in policy or planning.</p> <p>There is an open discussion of areas where it has been challenging to achieve the planned targets.</p>	3
A4	<p><b><i>Significant events or changes regarding governance and accountability</i></b></p> <p>Over the reporting period 3 board members have been appointed as former members stepped down.</p> <p>An organisational strategic refresh commenced in October 2018 and has more recently moved into both, the refreshment of individual thematic strategies, and the creation of a new Programmatic Strategy. In 2020, a refreshment of the SIM card indicators is also</p>	3



	<p>planned. In the next report, the panel suggests explaining how stakeholders' feedback might have fed into the strategy refreshment.</p> <p>It would be helpful in the next report to have an explanation of the steps Sightsavers has taken/is taking to add SIM key indicators, given that important indicators are missing, especially on partnerships, networks, and organisational abilities.</p> <p>While the report provides details of important internal changes at the level of governance, A4 also refers to the external contextual changes that the organisation needs to respond to. It would be helpful to see these discussed in the next report.</p>	
<p><b>B. Positive results are sustained</b></p>		
<p>B1</p>	<p><b><i>Sustainability of your work</i></b></p> <p>Sustainability and lasting impact are mentioned as core strategic aims, and the partnerships formed to these aims are key. The report includes a discussion of a number of practical examples of the organisation's learning and performance improvement (NTD programming, education and treatment campaigns). The report also highlights examples of the results of the organisation's impact evaluations. Sightsavers received a top performance rating from US charity evaluator ImpactMatters.</p> <p>The Panel notes positively that Sightsavers' partnership framework (Annex 1) includes sustainability and exit considerations into every project cycle. Useful examples of Sightsavers projects which have had sustainability successes are provided.</p> <p>While this section reports on various reports of impact, there is less attention on <i>sustainability</i>, which is the main focus of this section. It would be helpful to hear more about partners' increased capacity to sustain programme activities. This might include reflections on the lessons learned from evaluations of Sightsavers' partnerships based on partnership review survey, partnership learning capture template: and exit planning toolkit (as per Annex 1 Partnership Framework for implementing partners.)</p>	<p><b>3</b></p>
<p>B2</p>	<p><b><i>Lessons learned in the reporting period</i></b></p>	<p><b>3</b></p>



	<p>The report presents an impressive set of approaches to learning from its successes and failures, including learning reviews, evaluations, learning seminars, and learning events. The monitoring and evaluation teams merged in 2019 and added the learning function to their remit.</p> <p>The panel commends Sightsavers for publishing evaluation reports on a dedicated <a href="#">site</a> and its transparent and detailed reporting to IATI, and for the sharing of learnings through conferences and learning papers.</p> <p>While the report presents Sightsavers' approach to MEAL, B2 asks 'What lessons have been learned in this period – which is not covered (acknowledging that this has been partially covered in B1 above).</p>	
<p><b>C. We lead by example</b></p>		
<p>C1</p>	<p><b>How does your organisation demonstrate excellence on your strategic priorities?</b></p> <p>Sightsavers' four change themes are listed. The SIM card mentioned previously includes a breakdown of performance against each objective and it is publicly available online, therefore providing stakeholders data to scrutinise and assess performance. The indicators show excellent performance in certain areas, while the report is transparent about the SIM indicators the organisation has found it challenging to meet.</p> <p>Numerous staff members are also members of related organisations and initiatives that value and use their expertise.</p> <p>(We suggest that discussion of key partnerships is added to section D1 in the next report)</p>	<p><b>3</b></p>
<p>C2</p>	<p><b>Expertise is recognised and welcomed by peers and stakeholders</b></p> <p>Sightsavers is involved in several international projects and initiatives, working with diverse partners and actors to advance Sightsavers' goals. The organisation's recognised expertise and innovation is demonstrated in the report by providing an example of leadership role in an international initiative (inclusive Futures), by the achievement of the Zero Project Award for innovative practice, and by the</p>	<p><b>3</b></p>



	<p>commissioning by the UNESCO to produce a report on the education of children with visual impairments in sub-Saharan Africa. (also DFID's Independent Reference Group cited under C2). More examples are provided on how Sightsavers is working with partners in consortiums.</p>	
<p>C3</p>	<p><b><i>Inclusivity, human rights, women's rights and gender equality</i></b></p> <p>Sightsavers' efforts towards inclusivity and equality are exemplified with several partnerships with disability organisations aiming to strengthen inclusivity practices, to provide expertise on disability inclusive safeguarding, and to build capacity for the achievement of the SDGs for all persons with disabilities. Internally, Sightsavers promotes and supports an inclusive culture towards disabled people in the workplace.</p> <p>On gender equality, Sightsavers is committed to ensuring women have access to eye health and Neglected Tropical Disease (NTD) treatments. The panel commends Sightsavers for sharing its concern about the "barriers women with disabilities face in order to access social inclusion programmes", and notes positively the efforts to overcome this challenge.</p> <p>In the next report, the panel suggests enhanced attention to:</p> <ul style="list-style-type: none"> <li>● Sightsavers advocacy for the rights of disabled people. In the SIM card, Sightsavers teams rated themselves very positively for 'actively participating in international or in-country processes to influence change in policy or planning'. With what result?</li> <li>● Greater focus on other aspects of inclusivity such as sexual orientation, age, ethnicity, or minority groups in the contexts in which Sightsavers works.</li> <li>● Greater attention to performance indicators on inclusion or gender (via SIM or otherwise).</li> <li>● The results of the 'synthesis review to promote gender equality', and its follow up.</li> </ul>	<p>2</p>
<p>C4</p>	<p><b><i>Minimising negative impacts on stakeholders</i></b></p> <p>A comprehensive <a href="#">safeguarding policy</a> is available online, in the organisation's intranet, online training module, and it is shared with partners. Safeguarding is embedded in leadership job descriptions, and included into the risk management system. The safeguarding</p>	<p>4</p>



	<p>process is described in detail and an example is given on how safeguarding is central to partnerships selection. The approach to safeguarding is seen by the panel as <b>good practice</b>, including the requirement for partners to have a safeguarding policy.</p> <p>The report summarises an impressive set of policies and procedures for minimising negative impacts on stakeholders, including those regarding Modern Slavery, Anti-Fraud and Corruption, and Global Whistleblowing policies. These policies are available online in a <a href="#">dedicated site</a>.</p>	
C5	<p><b>Responsible stewardship for the environment</b></p> <p>Sightsavers is reviewing its environmental policy, which will address environmental management at country level including supply chains, travel and environmental risk assessment. The panel looks forward to reading the environmental policy once approved and published.</p> <p>The panel notes positively the creation of an Environmental Working Group (EWG) working on, among other objectives, sustainable travel, since it seems travel is the main source of CO2 emissions.</p> <p>Sightsavers measures CO2 emissions from electricity usage and paper consumption at the UK office only. CO2 produced from airborne travel is also measured, a table displaying CO2 emissions from short and long haul flights is provided.</p> <p>The panel notes positively addressing procurement environmental footprint and the plan for an emissions report from a preferred freight forwarder.</p> <p>The Panel looks forward to the results of the Environmental Policy and the development of country based environmental plans and the work of the Environmental Working Group.</p>	3
<p><b>Cluster B: Stakeholder Involvement</b></p>		
<p><b>D. Key stakeholders are identified with great care</b></p>		



<p>D1</p>	<p><b>Key stakeholders and how they are identified</b></p> <p>Sightsavers' key stakeholders are listed, including other INGOs, research and academic institutions. Several tools and processes for identification and quality assessment of several types of stakeholders such as beneficiaries and communities, local partners, and donors are described.</p> <p>The panel notes positively the existence of a Programme Partnership Policy and Framework that guides Sightsavers' approach to partnership, and also that a situational analysis is conducted during the project design process to identify key stakeholders for prioritisation in projects. There is a two stage due diligence process.</p> <p>Sightsavers is taking an active approach to how it can engage and influence other INGOs and consortia.</p> <p>The next report would benefit from reflection on lessons learned through Sightsavers comprehensive assessment of partnership capacity and safeguarding, key areas of strengths and weakness and how the organisation is adapting its capacity development processes in response (here or perhaps in C2).</p>	<p><b>3</b></p>
<p>D2</p>	<p><b>Reaching out to those impacted or concerned by your work</b></p> <p>The panel notes positively the community-directed approach implemented in the NTD programmes as an example of how Sightsavers innovates and engages directly with the communities. This approach has been outlined in an <a href="#">academic paper</a>.</p> <p>In education programmes, Sightsavers involves members of the communities in planning, gathering evidence, analysis and sharing findings from Community Based Participatory Research aiming to break down social injustice.</p> <p>The Panel notes these efforts positively, and would like to know more in the next full report about how beneficiaries and other stakeholders are involved in 'planning, gathering evidence and analysis' as stated in the report. How does Sightsavers overcome any challenges in engaging particular groups (such as rural low-income families, urban homeless, and migrants or displaced women and children)?</p>	<p><b>3</b></p>



D3	<p><b>Maximising coordination with others operating in the same space</b></p> <p>The <a href="#">programme partnership policy</a> linked to the report outlines Sightsavers' approach to working with other actors.</p> <p>The report refers back to D1, where various partnerships are described. Several examples are provided of how the partnership approach works in practice, including coordination of mass drug administration, International Coalition for Trachoma Control, Inclusive Futures, and the International Disability Alliance. Sightsavers is also engaged with UN-led, government and civil society processes, consultations, and negotiations as part of its advocacy.</p> <p>How coordination is maximised at national level, including with governments, is not covered and could helpfully feature in the next report.</p>	3
<p><b>E. We listen to, involve and empower stakeholders</b></p>		
E1	<p><b>Stakeholder feedback</b></p> <p>Sightsavers' methods to gather feedback and learn from communities are varied and are customised for the purpose of the feedback sought. Several examples are provided which evidence this diversity in methodology. The panel notes positively the approach to gather feedback directly from eye health project patients.</p> <p>Internally, the report highlights the inclusion of staff inputs on the strategy refresh and the periodic internal survey which was completed by 98% of employees in 2018.</p> <p>It would be helpful to know if Sightsavers has a specific policy commitment to gathering and responding to stakeholder feedback as a means of programme improvement.</p> <p>While interesting examples are cited, the organisation's processes for hearing from beneficiaries should be covered in this section in the next full report.</p> <p>In the next full report, the panel suggests addressing how feedback is taken onboard and to provide examples of changes made or decisions taken in response to feedback.</p>	3



E2	<p><b>Stakeholder engagement</b></p> <p>The report notes that partners are involved in project conceptualisation, design, and implementation, following an established process. A full review of the Quality Standard Assessment Tool (QSAT) is given as an example of engaging stakeholders to better understand their requirements and understanding of the tools, and as a means to improve the QSAT tools.</p> <p>The community-based participatory research (CBPR) approach methodology is given as an example of sharing decision-making and ownership by communities. In education research, the CBPR approach is said to ensure that “the experiences and ideas of children and young people with disabilities, their parents and their teachers have shaped Sightsavers’ education interventions”.</p> <p>The next report would benefit from:</p> <ul style="list-style-type: none"><li>• As in D2, an understanding of how communities are engaged in decision making.</li><li>• A short explanation and link to the QSAT process as this is a critical element of Sightsavers programme quality processes.</li></ul>	3
E3	<p><b>Main likes/dislikes from stakeholders and organisation's response</b></p> <p>The report describes learning and evaluation processes that include gathering of feedback from partners and communities that is shared with staff for response and action. External evaluations reports are publicly shared in a <a href="#">dedicated site</a>. In addition to evaluations, seven projects have been reviewed internally in the reporting period. The report provides examples of evaluations and other exercises and how the organisation has responded to them. The panel appreciates the example provided on how the feedback received in Malawi, led to recommendations on nutrition for children with disabilities and the later extension of the project to address the recommendations.</p> <p>The panel commends the participatory approach of the Inclusive Futures programmes, which “aim to facilitate people with disabilities to lead and drive the change they want to see”.</p> <p>The next report could usefully focus more on the content of the positive and negative feedback gathered from stakeholders, especially service</p>	3



	users and communities, and less on general description of the processes used to gather feedback.	
E4	<p><b>People and partners have gained capacities that last beyond your immediate intervention</b></p> <p>Sightsavers takes a system strengthening approach, embedding exit strategies across projects, and developing partners' technical capabilities through the QSAT tool.</p> <p>The panel notes positively the creation of the <a href="#">Accessibility Standards and Audit Pack</a> which is publicly available, and provides a toolkit to assess the level of accessibility of health infrastructure.</p> <p>Several additional examples are provided on how Sightsavers is assisting staff and partners on data management and quality services improvement among others.</p> <p>The panel has previously commended Sightsavers on this question, and overall it remains a <b>good practice</b>.</p>	4
<b>F. Our advocacy work addresses the root cause of problems</b>		
F1	<p><b>Evidence regarding the root causes of the problems you address</b></p> <p>The response states that Sightsavers works closely with people with disabilities and relevant organisations to ensure evidence based policy positions and advocacy activities.</p> <p>An example is provided on how Sightsavers promote the participation of people with disabilities in the follow up and review processes of the SDGs.</p> <p>It also mentioned the <a href="#">Research Strategy</a> and how its objective 2 commits to understand and describe the needs, systems, and context of the programmes Sightsavers works on.</p>	2



	<p>The report does not include examples / evidence of Sightsavers having analysed root causes and adjusted its programme in response. The next report could helpfully include more analysis of root causes.</p>	
F2	<p><b>Stakeholders support your advocacy work and value changes achieved</b></p> <p>The response describes #EqualWorld campaign on women and girls with disabilities participation and representation in political and public arenas. The panel congratulates Sightsavers for the success of the campaign and the very positive reaction received.</p> <p>In the next report, the panel suggests to address how Sightsavers systematically ensures the advocacy work is supported by the people Sightsavers works with and for.</p>	3
<p><b>G. We are transparent, invite dialogue and protect stakeholders' safety</b></p>		
G1	<p><b>Availability of key policies and information on your website</b></p> <p>The annual report will be available on <a href="#">the website</a> as of July 2020. A list of key policies are also available for downloading on <a href="#">this link</a>.</p> <p>A description of Sightsavers' principle on remuneration is described, which ensures the reward package is competitive with equivalent organisations so that talent can be attracted.</p> <p>The response also provides links to the IATI which provides further information on Sightsavers' work and to a comprehensive set of policies for accountability and transparency.</p> <p>The question on whether information is available in the relevant languages is not addressed</p>	4
G2	<p><b>Pay scale, gender pay gap and top salaries</b></p> <p>The panel notes positively the creation of a detailed, principles based global reward policy (included as Annex 3 of the report), which describes how Sightsavers ensures fair pay and includes benchmarking against local salaries. The panel commends Sightsavers for its</p>	4



	<p>transparency on the ratio between highest and lowest paid employees in the UK, which remains 6:1.</p> <p>The panel also notes positively the quarterly review of gender pay in the UK, the <a href="#">last report</a> showing a mean pay gap of 2.54% higher for men. Outside of the UK, gender pay gap is reviewed annually and it shows a reverse pay gap (as men tend to be employed on lower grades outside the UK). The report does not include plans to address gender differentials</p> <p>The salary of the CEO is provided. Rather than listing the top 5 salaries, the report includes a table from 2018 showing the number of staff with emoluments within ranges from 60,000 to 139,999 GBP.</p>	
G3	<p><b>Ensuring privacy rights and protecting personal data</b></p> <p>Sightsavers' website terms and conditions and privacy policy (provided in previous reports and still available <a href="#">online</a>) details what information Sightsavers collects, what is done with it, how it is kept secure, and how to amend preferences such as cookies or methods of communication.</p> <p>The panel notes positively the existence of a dedicated information security team leading on strengthening security controls. Sightsavers has been awarded the UK HMG <a href="#">Cyber Essentials</a> certificate.</p> <p>Sightsavers has a mandatory Data Protection e-learning module. Also, a so-called, Privacy Impact Assessment, is a requirement for project initiation.</p>	3
G4	<p><b>Largest donors and their contributions</b></p> <p>The report lists the five largest cash donors and their contributions for 2019 and 2018.</p>	3

## Cluster C: Organisational Effectiveness

### H. Staff and volunteers are enabled to do their best



<p>H1</p>	<p><b>Recruitment and employment are fair and transparent</b></p> <p>The report includes a detailed breakdown of staff across Sightsavers based on contract type (full/part time), seniority, local hires, gender, ethnicity and age. The Panel notes that more than two thirds of Europe based staff are female, whereas the opposite is true in most other regions. Does Sightsavers have any targets or processes in place to address this imbalance?</p> <p>The Panel commends Sightsavers on its continued efforts to hire locally, with all senior managers hired locally again in 2019.</p> <p>The panel commends Sightsavers for being awarded the 'Disability Confident Leader' accreditation from the UK government.</p> <p>Overall, the Panel commends Sightsavers on its approach in this area, and continues to recognise it as <b>good practice</b>.</p> <p>The next report could helpfully show the breakdown of female and male staff by seniority and whether Sightsavers has a plan to address staff gender imbalances, either numerically or grade-wise.</p>	<p>4</p>
<p>H2</p>	<p><b>Staff development</b></p> <p>The response explains how staff development is managed and how different resources are offered. The performance review process named 'Valuing Individual Performance' is still in use (completion rates of planned activities are not monitored). A more user-friendly process is in development for planning learning and personal development.</p> <p>A list of key initiatives aiming to enable staff to be more productive and enhance leadership are outlined, including policies and procedures reviews, manager inductions, and employee support through an external 24h confidential Employee Assistance Programme. Internal coaching and team building are available. Staff surveys have a high response rate.</p> <p>The organisation provides a set of mandatory and non-mandatory global training modules related to accountability and safety.</p>	<p>3</p>



	<p>The next report could usefully discuss what the organisation has learned about its approach to staff development and from staff surveys and how it is adapting to changing development needs.</p>	
H3	<p><b>Safe working environment</b></p> <p>The policies addressing safe working environment are listed, namely the Global Discrimination, Bullying and Harassment Policy, and Whistle Blowing Policy, which are available online on the <a href="#">website</a>.</p> <p>A Complaints Working Group was established to oversee the review of Sightsavers complaints management system, including the review and update of the definition of complaints and the development of an IT solution to administer complaints.</p> <p>Improvement plans are not included.</p>	2
<p><b>I. Resources are handled effectively for the public good</b></p>		
I1	<p><b>Resources are acquired in line with your values, globally accepted standards and without compromising independence</b></p> <p>A Global Fundraising and Donations Acceptance Policy (annexed to the report) has been updated in 2019 and guides Sightsavers' fundraising operations. The policy covers all third-party donations, and above a threshold of 10,000 GBP, donors are subject to policy guidelines which protect Sightsavers' independence and ensure funds are not obtained in a way contrary to the organisation's beliefs.</p> <p>Sightsavers is a member of the Fundraising Regulator, the independent regulator of charitable fundraising in England and Wales</p> <p>The Panel notes positively the dedicated site (<a href="#">fundraising promise</a>) and the 'supporter promise and <a href="#">privacy policy</a>'.</p> <p>The report states that donor contributions above GBP 10,000 are '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' but without explanation of how this process works. The next report could usefully clarify.</p>	3



12	<p><b>Monitoring of progress and re-allocation of resources</b></p> <p>The SIM Card continues to be used to track strategic performance, breaking down the overall strategy into a small number of clear objectives that reflect different elements of strategic implementation. The panel notes positively the monthly Management Team meetings focused on results so that organisational progress is maintained.</p> <p>On fundraising, Sightsavers' approach aims to ensure investing where the most net income can be produced.</p> <p>The report provides detailed explanation of how these processes function in principle but without examples of changes or actions taken (stopping funding for a project, for example) as a result of the stated 'dynamic management' and 'ability to respond strategically and quickly'. The next report could helpfully close this gap.</p>	2
13	<p><b>Minimising risk of corruption, bribery and misuse of funds</b></p> <p>The Anti-Fraud and Corruption Policy (annexed to the report) outlines the definitions, investigation procedures and penalties for incidences of fraud, applying to staff, partners and third parties. The panel notes positively the mandatory e-learning package that has been developed and launched in 2019.</p> <p>Finance team capacity has been increased to strengthen financial control mechanisms.</p> <p>The panel commends Sightsavers for the transparency about the fraud and theft instances listed and for its mandatory anti-fraud e-learning module.</p>	4
<b>J. Governance processes maximise accountability</b>		
J1	<p><b>Governance structure and recruitment of trustees/board members</b></p> <p>Sightsavers has a governing Council of Trustees with 15 members (8:7 male-female in the UK), whose details can be found on the <a href="#">website</a>.</p>	3



	<p>Interactions among the various global boards are reinforced in an annual event where all chairs are invited. Also the so-called 'shared trusteeship' allows trustees to sit on various boards and bring new perspectives.</p> <p>There aren't prescriptive ratios for diversity but rather "a fair representation". The Council of Trustees evaluates itself every other year, and individual trustees are evaluated by the Chair and Vice Chair every two years.</p> <p>The process for recruiting and replacing board members is explained, with reference to induction process.</p> <p>The report does not say so, but from the annual report, it is understood that trustees are appointed 'normally for two terms of four years, although this can be extended in exceptional circumstances...' (p72). The annual report also states that 'Recruitment of new trustees is based on consideration of skills, mindful always of the need to reflect diversity (in terms of gender and disability in particular) and maintain a balance of individuals from different countries', which the report does not explain.</p> <p>Given this commitment, the next report could helpfully report the ethnicity/disability profile of the UK Council (and other Sightsavers Boards, where possible).</p>	
J2	<p><b><i>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</i></b></p> <p>Sightsavers' Council of Trustees has ownership of organisational policies, and it delegates responsibility to several standing committees that provides oversight for several aspects of governance, assurance and control. It is stated that any fraud, safeguarding issue or legal action is reported to the Audit committee. Risk management and communication is also overseen at trustee level.</p> <p>The panel notes positively the formal meeting between the trustee taking the lead on Safeguarding and senior staff to discuss "responses to Safeguarding complaints and issues, risks, operational systems and policy". The minutes of the meetings are then reviewed by the Audit committee mentioned above.</p>	3



	<p>If there is a Programme Committee to oversee programme policy application at implementation level, this is not mentioned. The next report could helpfully clarify how this oversight function is performed.</p>	
J3	<p><b>Complaints handling mechanisms and overview of complaints (external)</b></p> <p>The panel notes positively the creation of the complaints working group in 2019, which works on strengthening Sightsavers' ability to receive community complaints. Different complaints mechanisms are being explored by research and safeguarding teams to reflect the needs of different communities. Sightsavers displays posters that explain the current complaints mechanism and also has dedicated mailboxes. It is also stated that the Safeguarding and whistleblowing policies have been reviewed. They are linked on the <a href="#">website</a> (the global complaints policy is also linked there).</p> <p>It is explained that 12 complaints were received during the report period and 7 "were assessed as valid". These complaints were handled accordingly using the Global Complaints Policy or the Global Safeguarding Policy and were reported to Trustees, regulators, and other stakeholders. Additionally a list of Fundraising complaints during 2018-19 is provided.</p> <p>There are no details about complaints received from community members or partners as systems are not yet in place. This is an important gap and Sightsavers seems to be some years behind some other AN members in developing such feedback and complaints mechanisms. The panel suggest that the next full report, pays far more attention to how complaints from communities and/or partners are addressed in this section of the report.</p>	3
J4	<p><b>Complaints handling mechanisms and overview of complaints (internal)</b></p> <p>The response states that internal complaints are handled following the <a href="#">Global Grievance Policy</a>. The number of grievances received in 2018 and 2019 are mentioned, none received in 2019. (It is assumed that this relates to the UK office only).</p> <p>The panel suggests that in the next report Sightsavers reflects on why the low numbers of grievances raised, and how aware employees</p>	2



	are of the process. It would also be useful to have a little more detail on how the internal complaints mechanism works.	
J5	<p><b>Protecting confidentiality and anonymity of those involved in complaints</b></p> <p>The response states that all reports and handled with confidentiality and that risk assessment are undertaken at the complaint handling phase and if relevant maintained throughout the investigation or complaints review cycles.</p>	3
<b>K. Leadership is dedicated to fulfilling the 12 Commitments</b>		
K1	<p><b>The governing body and management are held accountable for fulfilling strategic promises</b></p> <p>The response describes how council members are elected by the trustees and notes the induction programme that all trustees attend to. Individual trustees are evaluated every two years by the Chair and Vice Chair.</p> <p>The report does not respond to the question in the reporting framework about how the governing body and management are held accountable for their commitments on accountability. The panel suggests that in the next report the process for the self-evaluation of the council is explained, or if there is no process, what steps have been taken in the next reporting period.</p>	2
K2	<p><b>Inclusion of staff in discussing progress toward organisational accountability</b></p> <p>The accountability report is produced with contributions from various functions within Sightsavers, ensuring accountability is embedded within the organisation. The accountability report is published on the Sightsavers' website and uploaded to the staff intranet as well as circulated internally together with the feedback received from the IRP. Areas flagged are discussed at management group meetings.</p> <p>The panel notes positively that the so called, Transparency Working Group had developed an internal learning module regarding</p>	3



	accountability and transparency which explains the principles of transparency & accountability.	
K3	<p><b><i>Scope of this accountability report and influence over national entities</i></b></p> <p>The report covers the activities of the entire organisation including Sightsavers' seven subsidiary entities. The Panel appreciates this comprehensive approach to reporting and sees this as a <b>good practice</b> (other AN members may well be interested in how this is achieved).</p>	<b>3</b>