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ChildFund Australia Independent Review Panel Feedback

Accountability Report 2020-21
Review Round April 2022

Accountable Now · www.accountablenow.org ·

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ChildFund Australia

Feedback from the Independent Review Panel

Review Round April 2022

26th April 2022

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.

In the report there are links to a number of documents which the Panel has reviewed, including the progress reporting, KPI reports and programme effectiveness reports. We have a range of comments on these reports listed here, but applicable to other sections of this letter (and therefore not duplicated later):

- In the 2015/20 progress report and KPIs report the Panel recommends that you disaggregate by gender as you have done in your programme effectiveness report.
- We celebrate the increased delivery through civil society organisations.
- In the KPI reporting, the section on advocacy outcomes could be strengthened by indicating what outcomes have led to. eg. stronger partnership, more alignment on messages, interest of policy makers, etc.
- In the programme effectiveness report there is implied sustainability with evidence of increased capacity, there is also a great summary of impacts/insights for future programming e.g. on the DRR work, considering how to plan for local government funding constraints. How are these insights being built into programme design to close the loop? And how are results being reported back to the community and partners?
- We also recommend you reconsider the use of the term beneficiary, particularly if moving to more of a partnership model. There are many complex issues with this term, some which are highlighted in this blog from [feedback labs](#)



The Panel flagged the following areas of the report as strengths: Strong overview on the lessons you are learning as an organisation, your theory of change, strategic priorities and recognised expertise.

The Panel also flagged the following areas for improvement: Stewardship of the environment (C5), sharing the likes and dislikes of your stakeholders (E3) and moving to an approach which embeds gender transformative approaches (C3).

Overall, the Panel remains satisfied with ChildFund Australia's commitment to dynamic accountability, and finds its accountability practices to be sound. As such, we are happy to move ChildFund Australia to the biennial reporting cycle. This means that the next report should be a brief interim report on 2021-22, focusing on any major accountability related updates as well as the areas for improvement flagged above.

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 2020-21

Review Round April 2022

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. The statement highlights some key developments in the reporting period:

- The response to Covid-19, which focused on children's health, education, safety and active involvement. A snapshot of Covid-19 response projects across the Mekong and the Pacific is provided.
- ChildFund Australia's re-accreditation by the Australian Government.
- The development of the next Strategic Plan 2022-2025.

The Panel welcomes that the statement also addresses the [areas for improvement](#) flagged by the Panel in the previous report, which indicates the reporting process is used as an opportunity to learn and improve.

The Panel also celebrates your reaccreditation with DFAT.

Cluster A: Impact Achieved

A. The impact we achieve

A1	<p>Mission statement and theory of change</p> <p>The visions and missions of ChildFund Australia and the ChildFund Alliance (the global network of 12 child-focused development organisations ChildFund Australia is part of) are shared.</p> <p>The theory of change - based on four drivers of poverty that ChildFund Australia work to address - is shared in the report. A new theory of change has been developed and will be part of the new Strategic Plan.</p>	4
A2	<p>Key strategic indicators for success</p>	3



	<p>The Strategic Directions 2020-2021 were developed in consultation with the leadership teams across the organisation to rapidly adapt to the pandemic context while the development of the next Strategic Plan was paused. It identified four priorities and 12 KPIs, part of a KPI reporting framework (document shared with the Panel), which supported measurement, monitoring and reporting</p> <p>As requested by the Panel previously, information of progress against indicators for the previous Strategic Plan (2015-2020) has been shared with the Panel</p> <p>The KPI reporting framework is comprehensive and the Panel particularly welcomed the indicators on localisation. The IRP would like to share a few suggestions to strengthen it further:</p> <ul style="list-style-type: none"> - in your advocacy, consider also including case studies of success as these are often the most powerful demonstration - There is reference to spend on accountability but not indicators on feedback. The KPIs could be greatly strengthened with indicators on feedback from partners 	
A3	<p><i>Progress and challenges over the reporting period</i></p> <p>Progress against the Strategic Directions is reported to the Board by the Executive Team at Board meetings. The Board is responsible for adjusting the Strategy annually.</p> <p>A comprehensive FY20-21 KPI Report was shared with the Panel, and a high level summary is provided in the report, which includes progress and challenges across the four priorities.</p> <p>The summary on progress is good. There are many challenges about the external context, but do you have any reflections on challenges in your operations? And how would you adapt your work to address these?</p>	3
A4	<p><i>Significant events or changes regarding governance and accountability</i></p> <p>Changes to the Executive Team and the Board, including the appointment of a new Board Chair are outlined.</p>	4



	Several policies were revised and the strategic direction 2020-2021 introduced. Operational changes introduced to adapt to the ongoing Covid-19 disruptions are also shared.	
B. Positive results are sustained		
B1	<p>Sustainability of your work</p> <p>A Program Handbook (shared with the Panel) formalises sustainability as a key principle in ChildFund Australia's programming and documents minimum requirements on sustainability throughout project cycles. ChildFund Australia's approach to sustainable outcomes is based on an understanding of the fundamental link between sustainability and local capacity. The recently concluded Enhancing Program Quality (EPQ) project, and other initiatives as shared as examples of the approach.</p> <p>Evidence of sustainability from projects reviewed under the new MEL framework are captured in the Programme Effectiveness Report (shared with the Panel) and a couple of templates are shared in the report.</p> <p>The programme handbook would be significantly strengthened if it also included exit strategies and indicators on partner feedback.</p>	3
B2	<p>Lessons learned in the reporting period</p> <p>Key lessons learnt that informed Covid-19 interventions are outlined, including topics such as risk management, relationships value, and communications. The report also provides a narrative complementing the lessons learnt, which helps the reader understand the context and background.</p> <p>These learnings have been shared across the organisation and with the wider ChildFund Alliance network.</p>	4
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 plays a leadership or an active role, in particular ACFID and ARNEC. ChildFund Australia's role within</p>	4



	the ChildFund Alliance is provided, including contributions to Taskforces and Committees.	
C2	<p>Expertise is recognised and welcomed by peers and stakeholders</p> <p>The response highlights that ChildFund Australia is accredited with the Australian Department for Foreign Affairs and Trade (DFAT) and is a member of ACFID. Several good examples where ChildFund Australia's expertise has been recognised and welcomed, are provided, including the selection of ChildFund Timor Leste by UNICEF and the Ministry of Justice as partner in a Birth Registration campaign in four municipalities.</p>	4
C3	<p>Inclusivity, human rights, women's rights and gender equality</p> <p>The United Nations Convention on the Rights of the Child (UNCRC) is the foundation for ChildFund Australia's work, which is aligned with the four UNCRC' basic areas: survival, development, protection, and participation. Key documents reflecting ChildFund Australia's commitment to human rights and equality are listed and linked in the report.</p> <p>The mainstreaming of gender equality, disability and social inclusion (GEDSI) is supported by the creation of a new advisor role in this area and by a handbook and a toolkit for country offices. The disaggregation of data on gender and disability is used in MEL areas of work. Several examples are shared that illustrate how the organisation's approach works in practice.</p> <p>In future reports, the Panel would like to see more evidence of gender equality being better built in the change model, including more thinking of what a gender transformative approach entails. Gender transformative approaches go far beyond addressing gender blindness.</p>	2
C4	<p>Minimising negative impacts on stakeholders</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 Complaints Policy & Procedure.</p>	3



	<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>Regular risk assessments and reviews are 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.</p> <p>The re-accreditation with the Department for Foreign Affairs and Trade (DFAT) included a review of the Child Safeguarding and PSEAH policies, which were found to be meeting all criteria.</p> <p>The Panel commends again the strong policy framework and its supporting processes. The response would have been strengthened by explaining how country offices and other stakeholders have been involved in the development and review of the policy framework and how they were involved in its implementation</p>	
C5	<p>Responsible stewardship for the environment</p> <p>The Environmental Sustainability Policy commits to monitoring and managing environmental impacts of ChildFund Australia's operations and environmental sustainability in projects. Initiatives taking place during the reporting period are outlined, including a <i>Green Audit</i> of the Sydney office that has resulted in several commitments, one of them being reducing travel by 30%.</p> <p>The Panel notes very positively the commitments in these areas. Publishing or sharing in future reports the environmental impacts might be a good way of helping the organisation in holding itself accountable. Is there a system in place to measure CO2 emissions for example? How are the country offices involved in the implementation of the Environmental Sustainability Policy?</p>	2
Cluster B: Stakeholder Involvement		
D. Key stakeholders are identified with great care		
D1	Key stakeholders and how they are identified	3



	<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 several examples to illustrate the approach are shared.</p> <p>The response also explains that ChildFund has shifted from direct implementation of projects to partnering with local and regional actors. The Partnership Toolkit (shared with the Panel) outlines processes for identifying local partners.</p> <p>The toolkit is comprehensive. What would move this area of work to exemplary practice is reviewing your partnership toolkit and considering how your existing partners can be involved in identification of future partners.</p>	
D2	<p><i>Reaching out to those impacted or concerned by your work</i></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. An example from a project in PNG is shared to illustrate the approach to reaching out to stakeholders at the end-of-project evaluation phase. ChildFund Australia provides partners with open channels to provide feedback, which is used to inform improvements on the partnership approach. Relevant guidance documents on these processes have been shared with the Panel.</p> <p>The response would have been strengthened by providing a description of any findings from your tools 14 and 15 in the programme partnership toolkit, and by describing some of the challenges and opportunities with links to evidence.</p>	3
D3	<p><i>Maximising coordination with others operating in the same space</i></p> <p>ChildFund Australia engages with national and local governments through country offices to gain approvals to work in a geographic area, and to coordinate, and/or implement project activities. An example is provided to illustrate this approach.</p>	3



	<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 in the recently launched Emergency Action Alliance. 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>ChildFund Australia's role in partnerships can include coordination, capacity building and/or providing technical expertise, depending on contextual factors, which are reviewed periodically. Localisation & Partnerships have been identified as key pillars in the next Strategic Plan, and therefore research and consultation with partners have been commissioned to determine the role of ChildFund Australia vis-a-vis local partners.</p>	
<p>E. We listen to, involve and empower stakeholders</p>		
<p>E1</p>	<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 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. A formal partnership evaluation is carried out annually and it provides spaces for anonymous feedback and collective reflection. An example on how the annual survey has helped to spot trends and act upon feedback is provided. 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>3</p>



	The available channels for feedback from staff internally are outlined.	
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. This example demonstrates how stakeholders are engaged beyond programmes into advocacy. The Child and Youth Participation Policy is comprehensive and could be strengthened by explicitly recognising and addressing power imbalances (some of this is implied in safe spaces).</p> <p>A detailed example features the 'Ready for Life' programme in Laos, which involved children and youth as main actors of change. The evaluation showed that their inputs shaped the programme and that as a result of their participation, they have developed leadership skills, knowledge and confidence.</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. The report highlights the commitment to further support and engage with local partners to address their feedback around the increasing compliance requirements requested by donors (e.g. ChildFund Australia taking on counter-terrorism checking on behalf of the partner).</p> <p>The Panel commends ChildFund Australia for the sound approach to address feedback with stakeholders and to closing the feedback loop. This is considered a strength in the report.</p> <p>In addition, the Panel would suggest you explore a range of options for addressing the partner frustration on compliance. Reworking partnership tools is a great start, would it be worth influencing upwards towards donors too? The Panel also invites ChildFund Australia to include more</p>	2



	critical feedback about the organisation's work from people and communities.	
E4	<p><i>People and partners have gained capacities that last beyond your immediate intervention</i></p> <p>The response explains that ChildFund Australia implements a variety of projects on strengthening formal systems. 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 people and communities. Child Fund Australia has a Partnership Toolkit, which includes guidance on assessing partner capacity, developing capacity-strengthening plans and monitoring progress.</p> <p>Examples to illustrate how the people and partners have gained capacities are shared, including the support provided to a partner in Laos with training, policy drafting and reviews, etc.</p>	3
F. Our advocacy work addresses the root cause of problems		
F1	<p><i>Evidence regarding the root causes of the problems you address</i></p> <p>ChildFund Australia's definition of advocacy highlights 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 empirical research.</p> <p>Examples of advocacy work are shared, including a campaign for integrating child online safety into education curriculum in Vietnam.</p> <p>The Panel would like to see in future reports more on how are the root causes and drivers established together with stakeholders (ie. children, communities, etc., along with your advocacy tools.</p>	3
F2	<i>Stakeholders support your advocacy work and value changes achieved</i>	3



	<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>ChildFund Australia engages, seeks feedback and plans joint activities with peer agencies.</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. 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 local languages and in child-friendly formats. How can ChildFund Australia overcome the resource and capacity challenges? Perhaps this could be built into the partnership discussions.</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 and that the identified gender gaps in two offices in 2020 have been closed.</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> <p>The Panel would recommend linking to any relevant public policies that might support ensuring this is exemplary practice.</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 such as multi factor authentication.</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.</p> <p>The report states that the majority of funds come from institutional donors and Alliance members, but that there were 65 anonymous private donors. The report lists the safeguards that are in place to ensure anonymous contributions do not have undue influence over activities, and shares the Corporate Engagement Policy and the Proselytism, Politics and Development Policy.</p> <p>Given that the majority of funds come from other ChildFund members, it would be important to explain where they get their money from.</p>	3



Cluster C: Organisational Effectiveness

H. Staff and volunteers are enabled to do their best

<p>H1</p>	<p>Recruitment and employment is fair and transparent</p> <p>The response outlines initiatives and activities that remain in place (previous report also outlined most of them) aiming at strengthening the fair recruitment and employment process: Recruitment Standards including recruitment training and a question library, an Organisational Diversity roadmap, Leadership training, and exit interview analysis.</p> <p>The Employee engagement survey showed staff appreciated the value system in providing direction to behaviours.</p> <p>An overview of the composition of staff per country, including gender and age disaggregation, is provided.</p> <p>This answer could be strengthened by linking to relevant policies, including a recruitment policy and including an assessment of challenges you have faced and how you are overcoming them.</p>	<p>3</p>
<p>H2</p>	<p>Staff development</p> <p>Staff development was identified as a focus area on the employee engagement survey. The report 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 system is supported with an online tool to integrate self reflection and peer feedback into the process.</p>	<p>3</p>



	The Panel welcomes these developments and adds that they could be further strengthened with targets for development, including a staff development policy.	
H3	<p>Safe working environment</p> <p>The response mentions the Workplace Health and Safety (WHS) policy, focal points. The Employee Assistance Program proved impactful in the Covid-19 context. ChildFund Australia's HR policies and procedures are aligned with national regulatory requirements.</p> <p>A new Organisational Inclusion Policy is in place. The recommendations resulting from the gender assessments have been addressed, including strengthening inclusion.</p> <p>The Panel would recommend to explain how the policies apply to offices outside Australia.</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.</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.</p> <p>ChildFund Australia also has a procurement policy which expects procurement to be conducted in a transparent and accountable 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>	4



	<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 on 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 continues to be considered a good practice.</p>	
12	<p><i>Monitoring of progress and re-allocation of resources</i></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.</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. The new Strategic Plan will allocate additional resources in flagship programmes to ensure greater impact.</p>	4
13	<p><i>Minimising risk of corruption, bribery and misuse of funds</i></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 controls in place, including segregation of duties, delegation of authority,</p>	4



	<p>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. 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. 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 three fraud cases reported in the reporting period and how action was taken in line with policy and procedure. The Panel appreciates the openness demonstrated by ChildFund Australia and the comprehensiveness of the information provided.</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 defines the processes for the appointment and termination of Board Directors. A Directors Handbook (Document index was shared as Annex) provides guidance on the identification and recommendation of candidates to join the Board. 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. The most recent assessment has informed the recruitment to include youth and representation from countries where the organisation operates.</p> <p>The response explains ChildFund Australia's role and how it is represented in the ChildFund Alliance, including the Alliance Board, CEO Forum and other Committees and Taskforces. In future reports, the Panel would be interested to read about Board members continuity and term limits.</p>	<p>3</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>	4
J3	<p>Complaints handling mechanisms and overview of complaints (external)</p> <p>ChildFund Australia's Complaints Policy and the dedicated site are not mentioned in the report but the Panel has found them online.</p> <p>Reporting and responses mechanisms are validated by the communities and people ChildFund works for and with at program and project locations. Compliant policies are explained using mixed methodologies ensuring access to information by different groups. Staff and partners receive relevant training. Different communication channels such as email signatures or community meetings are used to reinforce the reporting pathways.</p>	3



	<p>A table outlining complaints by category during the reporting period is provided, though no details were provided. As flagged by the Panel previously, it would be of interest to show what portion of the complaints were validated as being genuine. A general outline on how complaints were treated is also provided.</p> <p>The Panel reviewed the Complaints Policy & Procedure shared in C4 and there appears to be no requirement for a risk assessment or do-no-harm. Also, It is not clear from the complaints policy what the actual procedure is to be followed in the event of a complaint.</p> <p>The Panel would also welcome seeing learning from complaints received and what changes have been put in places as a result.</p>	
<p>J4</p>	<p><i>Complaints handling mechanisms and overview of complaints (internal)</i></p> <p>The scope of the Grievance Policy (shared with the Panel) 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>As noted in the previous reporting cycle, data on internal grievances cases would have strengthened the response and provide readers with an indicator on how the organisation is addressing internal concerns. It would also be strengthened by explaining how you are learning from complaints and what you think the challenges and weaknesses of the system are and your plans to address these.</p>	<p>3</p>
<p>J5</p>	<p><i>Protecting confidentiality and anonymity of those involved in complaints</i></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 continues to flag the third party reporting mechanism as a good practice.</p> <p>When incidents are reported, ChildFund Australia endeavours to protect the complainant's identity, unless the complainant wishes to be</p>	<p>4</p>



	identified, or disclosure is required by law or necessary to further the investigation. This is particularly the case regarding criminal offences.	
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>The Panel would welcome examples of any findings from board management-level performance assessments.</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 the inclusion of staff in the development of the new strategic plan.</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 recommends the organisation strengthens this section with examples of actions taken in response to accountability weaknesses and</p>	2



	failures. It also recommends that you show how country offices have participated in the preparation of the report.	
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