Accountable Now
GLOBAL STANDARDS LOCAL TRUST

Sightsavers
Independent Review Panel Feedback

Accountability Report 2020-2021
Review Round October 2022/February 2023

Sightsavers Accountability Report 2020-2021
Feedback from the Independent Review Panel
Review Round October 2022/February 2023

15th February 2023

Dear Caroline Harper,

Thank you for submitting Sightsavers' 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 assessment below.

Sightsavers' eleventh report highlights the organisation's continued commitment to advancing dynamic accountability. The responses demonstrate organisational flexibility and responsiveness to significant changes in context, including the pandemic.

The Panel also notes positive advancement in terms of accountability in the following areas: Maximising coordination with others operating in the same sectoral and geographic space (D3), reaching out to those who are impacted or concerned by your work (D2) and income transparency (G4). Furthermore, the Panel is pleased to see that accountability is being advanced, as demonstrated by the establishment of a Racial Equity working group for staff and the commitment to partners despite funding cuts.

At the same time, the Panel identified that the following areas could be strengthened, which should form the basis for the next interim report: safe working environment (H3), handling of internal and external complaints (J3&J4), confidentiality and protecting the anonymity of complainants (J5).

Overall, while the report provided a lot of detail, some responses lacked examples on the implementation or operationalisation of policies. In addition, a number of examples fell outside of the reporting period and the Panel encourages organisations to focus on what action was taken within the reporting period itself.

In addition to this, the length and formating of the report made it challenging to read. As this type of report is prepared to engage with a wider range of stakeholders (as well as to receive external feedback), the Panel would strongly recommend that the report be shortened and explanations be made more concise. The use of simpler language and fewer words per page will greatly enhance accessibility.

The Panel also appreciates the difficulties in balancing the need to provide requested information and maintaining a reasonable length for reports, and thus have provided some suggestions in applicable areas below.

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

Accountable Now
Independent Review Panel

Sightsavers
Accountability Report 2020-2021
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Opening Statement from the Head of Organisation

Opening statement from the CEO Caroline Harper describes the current context in which Sightsavers, alongside other similar INGOs, currently operates in. She highlights the challenges brought on by COVID-19 and the War in Ukraine (and its correlated impacts), and how - now more than ever - the organisation remains committed to accountability to ensure that it remains a trusted collaborator for its donors, constituents, and staff.

The opening statement calls attention to three important accountability areas within the organisation (that have been a focus over the previous few years) namely:

- Providing staff opportunities to give feedback to the organisation and following up on the feedback received - including undertaking a Racial Diversity survey within the organisation.
- Finalisation of strategy, including new internal infrastructure that enable staff input into strategy, and enhancing their Strategy Implementation Mechanism (SIM Card).
- Remaining accountable to stakeholders and retaining their commitments despite unexpected gaps in funding.

Cluster A: What We Want to Achieve

A. The Impact We Achieve

A1	*What are your mission statements and your theory of change? Please provide a brief overview.*	3
	The organisation's mission, vision and core operational aims are provided. Its second operational aim is further qualified with research and coalition building to strengthen advocacy.	
	As of 2021, Sightsavers works under five thematic areas: eye health, refractive error, education, social inclusion, and neglected tropical diseases. While there is no overall theory of change, it is noted that Sightsavers have improved on the previous	

	report, stating clearly and providing a link through to its thematic areas' strategy and individual theories of change. The programmatic strategy guides the implementation of thematic strategies. Documents are available in both English and French, making them more accessible to a wider range of stakeholders. Notwithstanding this, the Panel would have liked to understand how these documents are made available to the communities being supported. The report also mentions the connection between each area's theory of change, and how they translate into indicators under the Learning Accountability and Monitoring Progress framework (LAMP). Sightsavers have presented a set of detailed strategies ranging from programmatic to thematic, with the respective theories of change. A monitoring and evaluation system is integral to these strategies. The Panel would like to hear why the fragmented approach was seen as preferable, and what its advantages are.	
A2	***What are your key strategic indicators for success and how do you involve your stakeholders in developing them?*** The organisation's key strategic indicators for success are monitored using the SIM Card tool. The review of the SIM Card's capacities, learning and growth perspectives were undertaken in conjunction with stakeholders and endorsed by the Board. The LAMP exercise was carried out with staff from across regional offices, and will now be piloted. Its roll out will take place in 2022 and 2023, with further updates to be provided in next reports. The organisation noted that while the LAMP and SIM refresh processes did not involve partners or beneficiaries, the strategy refresh process did. The organisation engaged these stakeholders through focus groups, interviews and consultations across each thematic area. The Panel welcomes the involvement of staff in the review of the monitoring mechanisms and would like to stress the importance of the input that partners and other stakeholders could provide to such an exercise. The Panel looks forward to learning about how LAMP has worked in practice and seeing evidence of its success. A further explanation of the SIM Card is available within the appendix to the report. Such public and external sharing of data is a very good step towards making reports more comprehensive. The Panel encourages the organisation to consider	*2*

	how this type of information can be made more accessible in terms of language, display, and format, to a general public who may be interested in its work.	
A3	**_What progress has been achieved and difficulties encountered against these indicators over the reporting period?_** While the indicators for progress are clearly indicated on the SIM Card tool, and progress is reported on the same interface, there appears to be no indication on the SIM as to what period it actually covers. Sightsavers' report also emphasises the organisation's commitment to system-wide change, and how its progress supports this. The organisation is transparent about their results in the past few years, noting that COVID-19 made a huge impact on their deliverables in 2020 in comparison to other years. The progress shown is very positive, despite these challenges. The report provides some examples of the progress achieved in the eye-health and neglected tropical diseases thematic areas. If the information is publicly available, it would be good to also provide a link to all indicators in a comparative format similar to the chart shown. The Panel appreciates that the COVD-19 pandemic caused unprecedented difficulties for service delivery and commends Sightsavers on their flexibility and responsiveness to the crisis, as well as the ability to resume delivery fully in 2021. It also appreciates the particular attention paid to ensuring gender equality in its service provision by reaching out to women who are more affected by certain health conditions. The Panel recommends that in order to strengthen this section the organisation can provide a visual representation of the relevant data so that a wider audience can understand the results achieved.	**2**
A4	**_Have there been significant events or changes in your organisation or your sector over the reporting period of relevance to governance and accountability?_** The report mentions minor changes at the Board level, alongside the refresh of the thematic strategies. The latter was done through working groups comprising a range of internal stakeholders within the Sightsavers, empowering staff to input into organisational strategy. To improve, Sightsavers can consider how they can further engage local partners and constituents in future refreshes.	**3**

Once the new strategy has been operating for a couple of years, it would be good to understand how these new thematic areas affect and improve the organisation's accountability practices.

Sightsavers also took the advice from the last panel feedback, and included external changes such as funding cuts from FCDO and COVID-19. The Panel commends the effort that Sightsavers has put in to ensure that their work is fulfilled and the partnerships built up within these programmes are maintained using alternative sources of income.

The organisation's effort in taking adaptive measures to ensure that they are responding to the changing needs of their staff during and in the recovery period from the Pandemic is also commendable. These adaptations are reflective of the organisation's accountability and flexibility towards staff.

B. Positive Results Are Sustained

B1 | ***What have you done to ensure sustainability of your work beyond the project cycle, as per commitment 4? Is there evidence of success?*** | **3**

The organisation followed up on the advice given in the last accountability report and demonstrated how clear sustainability goals have been built into its policies in terms of partnerships. The examples given through programmes such as NTDs and Eye Care showcase how projects are sustained by partners past the project cycles.

The report acknowledges that while the organisation has clear exit strategies for each programme, due to capacity constraints Sightsavers do not currently systematically review those exit plans and the subsequent outcomes in the years that follow a project's end.

On the last point - SOS Children Villages' (see their 2019 report) approach to social impact assessments may provide some guidance on how sustainability past the exit point can be evaluated.

The Panel appreciated examples in the report of how evidence gathered through monitoring informed learning about sustainability. In particular, it sees the use of information management systems in programming, such as DHIS2, to improve programme delivery and ensure buy-in by local authorities as an example of **good practice.**

B2	*What lessons have been learned in this period? How have the lessons been transparently shared among internal and external stakeholders? How do you plan to use these lessons to improve your work in the future?*	3

Learnings from how patients with disabilities access services were highlighted. On this end, it would be good to further understand how these learnings have informed project design going forward, and what impact the implemented changes may have on accessibility.

The report also touches on how Sightsavers is centralising learning and evaluations through their annual evaluation updates newsletters. The report also showcases how the organisation is working towards further transparency and accessibility of its evaluations. The Panel appreciated that evaluation outputs are made available in French, in addition to English, so that they can be shared with francophone partners. The Panel would like to inquire whether main points of learning are also made available in local languages to enable broader reach and more meaningful interaction with communities in the countries where Sightsavers works.

The Panel would like to see more specific lessons learned, as well as clear commitments on how these can be implemented in the next report. In this way, the report can also provide an opportunity for the organisation to set goals and reflect on areas where it feels continuous improvement is needed.

C. We Lead By Example

C1	*How does your organisation demonstrate excellence on your strategic priorities?*	3

Sightsavers's report states that with its new LAMP initiatives, monitoring of strategic priorities can be done down to individual project levels and this enables the organisation to learn better.

The report also provides a list of different international initiatives that the organisation is a part of or is leading on. These alliances show the organisation's collaboration with other organisations and networks, broadly learning and supporting others working in similar fields. Sightsavers has also been working on providing courses and webinars for and with other peer organisations, passing on its practices and knowledge.

In the next report, the Panel would be interested in hearing what the outcomes of these initiatives have been, and what the collaboration with other organisations and networks has led to.

C2	*What evidence is there that your expertise is recognised and welcomed by your peers, partners and other stakeholders?*	**3**
	The organisation's work and innovation in advocating for disability rights and support against eye diseases have been recognised by multiple awards. Similarly, its researchers' work in preventing NTDs have also won awards.	
	Its expertise as an organisation is welcomed and recognised; this section and the previous section (C1) showcase the organisation's current positive participation in consortia, and the section B1 touch on how Sightsavers' work has later been implemented/continued by its partners.	
C3	*How does your organisation practice being inclusive and protecting human rights, including promoting women's rights and gender equality, in accordance with commitments 1-2?*	**2**
	The Panel notes Sightsavers' commitment to justice, equality and gender equality. The establishment of the Racial Diversity Working Group with a broad membership enabling organisational introspection is an important step in the right direction. The organisation-wide survey to gather staff views on issues of race and how Sightsavers handles them yielded a high level of engagement and largely positive responses.	
	The appendix gives an example of how the organisation works internally through a Racial diversity working group to drive culture change in combination with reviews of their policies. It would be interesting as well to understand how the organisation ensures inclusion for external stakeholders as well. With regards to this, the Panel would have liked to see specific details on this (e.g. 'when' was the working group formed and 'how often do they meet', what action was taken in response to the survey results etc), as this would help to indicate what progress has been made in this area.	
	On Gender Equality and Women's Rights (commitment 2), the report details examples from different countries/programmes in which the organisation works towards gender equality, including how it is collecting inclusive data (data which is disaggregated by age, sex, disabilities, etc) to further understand factors that affect access to services, and how it is using this data to review projects and improve.	
	From the explanations regarding the SIM Card mechanism, the Panel can see that Sightsavers is further working to advance the inclusion of disabled people in policy	

	making. In the next report, the Panel looks forward to receiving further evidence and outcomes on how this line of work has been achieved.	
C4	***How do you minimise your organisation's negative impacts on your stakeholders, especially partners and the people you work for? How does your organisation protect those most susceptible to harassment, abuse, exploitation, or any other type of unacceptable conduct?***	*2*

The report outlines the organisation's approach to safeguarding, including how the policy is reviewed, reinforced and lived at different levels. The policy is shared with partners, and the Head of Global Safeguarding maintains a separate risk register on safeguarding itself.

Staff and trustees of the organisation are also required to undergo safeguarding training. In addition, the organisation reviewed and updated its Global Anti-Slavery Policy, and provided specific training to staff to further strengthen controls over human-trafficking.

In connection with the safeguarding framework, and in particular the compulsory safeguarding training for staff and trustees, the Panel would like to know how often staff and trustees are required to attend such training, how many such training events have been delivered within a year in the various locations and what the uptake has been like. Moreover, the Panel would be interested in how the awareness and behaviours of staff and trustees have changed as a result of this training.

While information regarding annual training for Designated Safeguarding Leads alongside their feedback were included in the appendix, it was noted that the training referred to was carried out in November 2022, while the period for this report covers the 2020/21 year. The Panel welcomes the practical actions that each DSL leaves the session with, and that internal audits now include safeguarding as a way to seek improvement.

The report also highlights the launch of the Speak Up system, which does not replace but rather enhances the existing whistleblowing, safeguarding, and fraud reporting mechanism. The mechanism is widely accessible in multiple languages, enabling stakeholders to give feedback anonymously.

It would be interesting to understand how the organisation is ensuring accessibility of mechanisms such as Speak Up in localities with lower internet coverage, and how the rollout among staff and communities took place. Moreover, given the existence of multiple reporting mechanisms which, in addition to Speak Up, include

whistleblowing, safeguarding, and fraud reporting mechanisms, the Panel would like to know how their interoperability is ensured and duplication avoided.

The Panel notes the implementation of the Minimum Partnership Criteria assessment as **a good practice**.

C5	***How do you demonstrate responsible stewardship for the environment?***	**3**

The report outlines the different initiatives working on ameliorating the climate impact of the organisation. A clear and positive example (vision centres in Sierra Leone) of how the organisation is minimising its climate impact in terms of activities is given.

Through its Environment Management System, the organisation is also monitoring its carbon footprint and reporting against international standards and national requirements. In the next reporting round, it would be good to provide a table to showcase the EMS, and how it looks in practice for each country-office in the next reporting round.

Sightsavers' new Environmental Policy addresses how the organisation is committed to minimising climate impact in procurement, travel and fundraising/marketing practices.

Cluster B: Stakeholder Involvement

D. Key stakeholders are identified with great care

D1	***Please list your key stakeholders. What process do you use to identify them?***	**3**

A list of key stakeholders and a clear explanation on how they have been identified are provided. This list, however, does not include donors. Existing stakeholders are then engaged in the identification of new stakeholders.

Once identified, Sightsavers' Programme Partnership Policy guides the organisation's approach to partnership. There is a clear due diligence and safeguarding process for choosing new partners.

The Panel notes positively Sightsavers' commitment to building up its partners' capacity in terms of safeguarding and due-diligence through including these as standard budget lines and providing relevant training.

D2	*How do you ensure you reach out to those who are impacted or concerned by your work?*	3
	Sightsavers engages with local stakeholders to obtain their feedback on how progress at the local level should be tracked, using their input to improve upon matrices. The Panel welcomes Sightsavers participatory development process, and the involvement of all stakeholders in programmes.	
	In revising its ethical position statement and guidance, Sightsavers also now closes the feedback loop by disseminating evaluations widely to stakeholders through events that enable those stakeholders to discuss the findings with the project team.	
	The application of a community based participatory research (CBPR) model in the BA Youth Futures project is positively noted. The approach enables those who are affected by the research to take a leading role, ensuring that the outcomes are informed by those who are most impacted.	
	In the next report, the Panel looks forward to hearing about the application of the ILD tool and its effects.	
D3	*How, specifically, do you maximise coordination with others operating in the same sectoral and geographic space with special reference to national and local actors?*	4
	Concrete examples of how the organisation works in partnership are provided in B1, C1 and D1. In this section, an example of how Sightsavers is working in consortia alongside those who are focusing on similar issues is provided.	
	The example of the Inclusion Works initiative is given alongside several ways through which the organisation collaborates with others such as governments and other organisations at national levels to avoid duplication.	
	In its policy and advocacy work, Sightsavers works in conjunction with other organisations to maximise and complement efforts. Sightsavers is also participating and chairing many key platforms relevant to its work.	

E. We listen to, involve and empower stakeholders

E1	*What avenues do you provide your stakeholders to provide feedback to you? What evidence demonstrates that key stakeholder groups acknowledge your organisation is good at listening and acting upon what you heard?*	3
	Various examples of how stakeholders are engaged in different evaluative processes at different levels are provided. The use of the Most Significant Change	

and Participant Voice techniques is innovative, enabling stakeholders to evaluate projects through qualitative means and highlighting the most important change aspects.

Beyond service recipients, another example highlights how the organisation used feedback from project staff and people with disabilities.

The report also showcases how Organisations of Persons with Disabilities chairs different steering committees within the Disability Inclusive Development (DID) programme. The example is noted as a positive one since it enables the collective voice of those most impacted by the organisation's work in the drivers' seat.

While interesting and innovative examples of stakeholder engagement are provided, other sections of the report (E2) allude to a specific organisation-wide approach in engaging and acting on beneficiary feedback, and the Panel would like to understand this approach in further details in the next reporting round.

The Panel notes with interest the Participatory Video and the Most Significant Change approaches. In the next report, the Panel would like to hear how these approaches resulted in feedback upon which action was taken by the organisation and the stakeholders' reactions to it.

E2	*What evidence confirms a high level of stakeholder engagement in your activities and decisions from beginning to end?*	*2*

The report shows that the organisation engages stakeholders at multiple points throughout the project cycle, from planning to reviews and evaluations. An example of how Sightsavers apply participatory design processes is included.

The Panel positively notes Sightsavers' commitment to improvement and action from the previous reporting cycle. The effort to identify and develop new tools and approaches to improve how feedback is gathered is well received.

The report also states that the "Communities and People We Serve" working group within Sightsavers is refining the organisational approach to beneficiary engagement, the Panel notes this as a positive development and looks forward to seeing the approach in more detail in the future as well.

E3	*Main likes/dislikes from stakeholders and organisation's response*	*2*

The report acknowledges that due to the COVID-19 pandemic, traditional channels for evaluative methods were not available. Sightsavers' adaptation to other methodologies for collecting feedback, and the understanding of potential constraints, are well noted.

	The report provides an example of how the organisation acted upon the feedback received and course-corrected to stakeholders' needs. Beyond the example within this section, other examples in E1 and E2 also point to similar practices.

Additionally, the appendix shares an example from Cameroon regarding how the organisation sought feedback from participants in different districts. Feedback that became recommendations include improving communications and providing more information to communities.

The Panel appreciates that COVID-19 restrictions made it difficult to collect feedback from stakeholders. The Panel looks forward to receiving information about the main likes and dislikes from key stakeholders in the next report. A potentially interesting example of how feedback, suggestions, and commendation from a range of stakeholders can be systematically collected and tracked comes from Educo in their 2021 report. | |
| E4 | ***How do you know that people and partners you worked with have gained capacities, means, self-esteem or institutional strengths that last beyond your immediate intervention? (You may skip this question if you have addressed it in your response to B. 1)***

Sightsavers takes an approach to partnership that is supportive rather than critical, system-wide and provides their collaborators with opportunities and capacities to continue advancing. The Panel commends efforts to support community members to become leaders and responders, as well as efforts to enhance the capacities of partners to advocate on their own needs.

The report shares the result of the accessibility audit tool as an example on how their intervention has lasting positive effects for their partners. The same tool is also being redeveloped for other projects.

The organisation is committed to using the QSAT tool which provides reference points against which projects are evaluated (a further explanation is available within the appendix); the tool also provides clear assessments upon which action plans can be developed. These plans support partners to implement changes that they may not have previously considered.

The Panel appreciates that a range of approaches and tools listed in this section could result in strengthened capacities, self-esteem and organisations of people and partners Sightsavers has worked with. In the future report, the Panel would like Sightsavers to share further examples and direct feedback from its partners and participants. | **2** |

F. Our advocacy work addresses the root causes of problems

F1	*How do you identify and gather evidence regarding the root causes of the problems you address and use this to support your advocacy positions?*	2
	Sightsavers is currently putting in place long-term advocacy plans in its country-offices, doing so through research, context reviews, analyses, and discussion with partners.	
	Each of its programmes is required to have an accompanying advocacy plan; these are based on previous evidence, reviews, and experiences. It is positively noted that these plans are further enriched and enhanced by discussions with stakeholders, especially those most impacted.	
	Advocacy is monitored using the Levels of Influence model, tracking the progressed change and enabling the organisation to reflect on their input into such change.	
	The continuous dialogue between the advocacy, policy, research and country-office teams to ensure that advocacy is cohesive and research-led, is well received.	
	The Panel looks forward to receiving evidence of how long term advocacy plans have supported Sightsavers' advocacy work.	
F2	*How do you ensure that the people you work for support your advocacy work and value the changes achieved by this advocacy?*	2
	The report states that Sightsavers collaborates with stakeholders throughout their advocacy work. The organisation makes available funds to ensure participation of OPDs and stakeholder groups' representatives at high level and international fora. They also convene consultations to enable their stakeholders to feed into governments' reports against the SDGs.	
	Another well received example is regarding the participatory advocacy research paper focusing on the rights of women with disabilities and implementation of the SDGs in India.	
	To improve, the Panel suggests further presenting information on the views and feedback of OPDs Sightsavers partners regarding this partnership in advocacy and its successes.	

G. We are transparent, invite dialogue and protect stakeholders' safety

G1	*Are your annual budgets, policies (especially regarding complaints, governance, staffing/salaries and operations), evaluations, top executive remuneration and vital statistics about the organisation (including number of offices and number of staff/volunteers/partners) easily available on your website in languages accessible*	3

by affected key stakeholders? Please provide links, highlight membership in initiatives such as IATI and outline offline efforts to promote transparency.

Sightsavers' annual reports are [available on their website.](#) It is positively noted that Sightsavers have made these reports accessible to their affected key-stakeholders through screen-reading technology.

A [list of key policies](#) and a description of how salaries are set are provided. Remuneration for top executives and vital organisational statistics are available within the annual report.

The report notes that information is available in other languages for their country-offices when applicable. The Panel encourages Sightsavers to make these already available in different languages where the organisation works and easily accessible on their respective language site website.

A [link](#) for the organisation's membership in IATI is included.

G2	*What policies do you have in place to ensure a fair pay scale? Do you measure the gender pay gap in your organisation, and if so what is it? What are the salaries of the five most senior positions in the organisation, and what is the ratio between the top and bottom salaries? If this information cannot be provided or is confidential, please explain why.*	3

Sightsavers have in place a Global Reward Policy that supports consistency in remuneration across the organisation. A description of how the organisation uses market data to scale remuneration across different localities is also provided.

Sightsavers monitors the gender pay gap within their organisation in compliance with UK law and through spot-checking in their other offices. This year's report improved on last year's report, reducing the gender pay gap within the UK from 2.54% to 0.27% in favour of men.

While not mentioned in the report - Sightsavers is submitting data to the [Fairshare Monitor](#), and received positive ranking in 2021.

The ratio between the top and bottom salary remains 6:1, and the salary-ranges of the five most senior positions are given. The CEO's remuneration is also available on the organisation's website.

The Panel commends Sightsavers for the salary transparency, also regarding the fairness of the pay scale and the negligible gender pay gap in the UK, however, it would encourage Sightsavers to report in the future on how these apply to the remaining country-offices or subsidiaries.

	The Panel would like to encourage Sightsavers to also consider how other factors such as race, religion, ethnicity, etc, affect its remuneration structure if possible. Are there any disparities in terms of the race pay gap? Moreover, are interns remunerated for their work?	
G3	*How do you ensure privacy rights and protect personal data?* Sightsavers provided its privacy policy ([available online](#)) in a previous report. The organisation states that it complies with GDPR and strengthened procedures around rights to erasure. Beyond the scope of the question, the report details how the organisation manages information security risks. The report also explains how Sightsavers is improving its IT system to avert future threats. The Privacy Impact Assessment is provided as an annex. The assessment enables projects to review the information being collected, and how they are handled. The Panel would be interested in hearing how these procedures apply across the organisation in the 30 countries where it operates.	3
G4	*Who are the five largest single donors and what is the monetary value of their contribution? Where private individual donors cannot be named due to requested anonymity, please explain what safeguards are in place to ensure that anonymous contributions do not have unfair influence on organisational activities.* The names of the largest five donors and their contributions are provided in a table. One of the donors is an anonymous foundation; Sightsavers' Global Fundraising Donor Acceptance policy (see annex) guides the checks that the organisation performs. The Panel encourages the Global Fundraising Acceptance Policy to be synergised with issues relating to Counter Terrorism Financing (if not already the case - see point I3 below).	4

Cluster C: What We Do Internally

H. Staff and volunteers are enabled to do their best

H1	*Provide evidence that recruitment and employment is fair and transparent.* The organisation retains its 'Disability Confident Leader' accreditation from the UK government, continuing to develop many initiatives to support candidates with disabilities to join their workforce. The organisation also puts in place multiple working	2

	groups to support staff on race and disabilities. Sightsavers' efforts on this end is very commendable. Statistics for the percentage of new hires who were people of colour (10%), and with disabilities (14%) for the UK office were given. Statistics on gender balance of staff in the UK (70% female) and Senegal offices (43% female) were given. The organisation is introducing a new recruitment system for 2022 to better attract diverse candidates. As mentioned in I2 - Sightsavers recruit as close to the project area as possible, focusing on local hires whenever skill sets are available. While the last full report has already provided details in terms of contract type, seniority, local hires - it would still be useful to provide more up-to-date information as this would show the organisation's improvement/the impact of the changes made as committed to in the report over time. The Panel, therefore, looks forward to receiving information in the next report on recruitment and employment In Sightsavers offices outside of the UK.	
H2	***What are you doing to invest in staff development? What indicators demonstrate your progress? What are your plans to improve?*** The mechanism of how staff's learning and development works is provided. The organisation employs two Senior HR Business Partners (SHRBP) to provide coaching and mentoring to their staff and teams. SHRBPs also designed "Leading the Way" , a workshop for management staff - the fact that it has been adapted to suit local offices' needs is very welcomed. The VIP system is still in use to support managers to plan their teams' development. The organisation also has in place clear policies and procedures, alongside solid support systems for employee wellbeing, round the clock confidential Employee Assistance Programme (EAP) helpline, trainings and surveys to support their staff. As mentioned in the previous feedback - it would be great to learn more about Sightsavers' reflection since implementing these systems, and its staff's experience in using them.	**3**
H3	***How does your organisation ensure a safe working environment for everybody, including one free of sexual harassment, abuse, exploitation or any other unacceptable conduct? What indicators demonstrate your progress? What are your plans to improve?***	**2**

Links to the organisation's Global Discrimination, Bullying and Harassment Policy, and Whistleblowing Policy are provided. The organisation also put in place a Complaints Working Group to oversee the changes to these policies.

A new system called Speak Up is implemented to support staff, beneficiaries, partners, and other groups.

The Panel appreciates that introducing an incident reporting system across an organisation working in 30 countries is no small feat. The Panel, however, would be interested in hearing about the challenges arising in this regard, in particular how the system was rolled out among staff and communities, what their response has been and what support they received to be able to use the system effectively.

The Panel recognizes that the system has been in operation for just about one year by the time this report was submitted. However, the Panel notes that 12 reported cases is most likely an indication of underreporting, possibly due to a lack of awareness among staff and communities, their lack of trust in the system, language obstacles and other reasons.

The Panel looks forward to receiving information in the next report about actions taken to strengthen the effectiveness of the system.

I. Resources are handled effectively for the public good

I1	***How do you acquire resources in line with your values and globally-accepted standards and without compromising your independence?***	3

The Global Fundraising and Donations Acceptance Policy provides guidelines to the organisation's fundraising operations globally. The policy showcases how donations can be accepted, and donations with identified risk(s) need to be reviewed by the Donation Review Committee.

Sightsavers provides its donors with clear information on how their data is used in their Support Promise and Privacy Policy.

Sightsavers is also a member of the Fundraising Regulator, Direct Marketing Association and the Institute of Fundraising.

I2	***How is progress continually monitored against strategic objectives, and resources re-allocated to optimise impact?***	3

The SIM Card system continues to be implemented, alongside new development in the LAMP system that brings monitoring closer to the project levels. From the report,

	a dynamic management structure has enabled the organisation to quickly adapt and adjust to ensure that strategic objectives are met. Sightsavers' global support team is increasingly recruited from local/regional pools, therefore putting in place a support system which is better placed to meet the demands of country-offices. How progress is tracked and resources reallocated to optimise impact in terms of fundraising and programmes are outlined. Resources allocation is flexible, enabling the organisation to work towards thematic strategies. Sightsavers uses thematic working groups to further monitor and resolve issues across projects. The Panel notes how agile and responsive Sightsavers was in adapting to the changing funding environment, in particular by minimising the impact of cuts in UK government funding.	
I3	***How do you minimise the risk of corruption, bribery or misuse of funds? Which financial controls do you have in place? What do you do when controls fail? Describe relevant situations that occurred in this reporting period.*** An Anti-Fraud and Corruption Policy and a Global Anti-Terrorism Financing Policy guides Sightsavers' processes in dealing with incidents of fraud. The report states that all incidents are reviewed in order to strengthen the processes. During the reporting period, controls were also strengthened in terms of centralising and automating payment across Africa offices and reducing complexity for country-staff. It is commendable that Sightsavers continues to implement its mandatory e-module for all staff and reiterating clear messaging regarding anti-fraud. If security allows, it would be useful to further learn about how anti-fraud action in terms of cyber abuse is being strengthened as this would be a great learning point for peer organisations. The Panel would like to receive more information around the number of incidents of fraud and corruption reported within the organisation and about how the offices were strengthened and operations improved in African operations. Will similar rollouts be implemented for European and Asian operations?	2

J. Governance processes maximise accountability

J1	***What is your governance structure and what policies/practices guide replacing and recruiting new trustees/board members?***	3

While not mentioned in the report itself, Sightsavers' annual report (2020, pg. 70-71) outlines the governance structure of the organisation. Information regarding the current board can be found on its website.

Within the report, information regarding the Council of Trustees, how trustees are recruited, and their induction process is included. Trustees are selected based on fair representations, although no formal prescription is imposed.

It is well-noted that trustees are also obliged to undergo similar safeguarding and disability awareness training as any other staff. It would be good to showcase the effective diversity of the Board in terms of disability, race and geographical coverage.

| J2 | *How does your board oversee the adherence to policies, resource allocation, potential risks and processes for complaints and grievances?* | 3 |

The Global Board delegates the responsibilities for policies and resource allocation to specific committees (the Audit Committee, the Investment Committee, the Remuneration Committee and the Governance Committee.) The Audit Committee is in charge of reviewing the risk register, and risk owners are responsible for consolidating and updating those risks.

A trustee is nominated to lead on safeguarding, holding formal discussions with its Global Head of Safeguarding.

A direct channel is also available for staff to share complaints with the Board. While it is very positive that this channel of communication exists to connect staff to the Board, it would be good to learn whether this channel is seen as effective by staff and the Board and what safeguards are available for staff who use this channel.

As mentioned in the previous feedback letter, it would be good to further learn about how programmatic policies are overseen.

| J3 | *What processes and mechanisms does your organisation have in place to handle external complaints, including those relating to unacceptable conduct? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.* | 2 |

The Panel commends Sightsavers' transparency in sharing the number and nature of safeguarding concerns received. The report also provides a brief explanation of how each incident was addressed. The appendix further shares that all safeguarding

incidents are monitored at Board level - this is a standard practice and should be continued.

Sightsavers is candid about the complaints it has received regarding its fundraising practices, and how it handles these instances.

While not mentioned explicitly in this section, Sightsavers has a [Global Complaints Policy](#) that guides how complaints are handled.

The report for the year 2019 also mentioned a Working Group on strengthening complaint collection from communities. This current report does not provide updates on this end, and it would be good to learn about the WG's progress.

While reference was made to safeguarding and fundraising complaints, there was no mention of any other forms of complaints received by the organisation. In future reports, the Panel would also appreciate information being included on external complaints received, including what proportion of the complaints received were substantiated.

J4	***How are internal complaints handled? Please provide an overview of the number and nature of complaints in the reporting period, how many of those were valid, and of those that were valid, how many were appropriately handled and resolved.***	*2*

Sightsavers has a range of clear policies and mechanisms in place to support their staff.

In 2021, they received two formal complaints. The nature and the resolution process of these complaints are not provided. The organisation recognises that the number appears low, but hopes that the new Speak Up system would enable staff to submit feedback more candidly. In the next report, the Panel would be interested in seeing the number and nature of complaints received overall.

The organisation's effort in ensuring that channels are available internally is commendable. The organisation can potentially also outline informal grievances - or provide open channels (perhaps through yearly surveys) for staff to share their feedback, so that they can express any concern without the need to escalate a formal grievance.

Given that there appear to be various channels of reporting available to staff and persons outside the organisation, the Panel would like to know how the Board is made aware of all of the various complaints received through these channels.

J5	*How do you make decisions about the need for confidentiality and protecting the anonymity of those involved?*	2

The report states that all complaints are handled with the strictest of confidentiality for those involved and that risk assessments are carried out to ensure that confidentiality is maintained.

While not mentioned in the report, the Whistleblowing Policy and the Grievance Policy both include confidentiality clauses that protect the complainants.

The Panel would like to know how need-to-know applies in practice and which training on confidentiality and information sharing has been provided to staff. Moreover, it seems that a considerable number of staff are involved in complaints handling, including through coordination of the Governance and Complaints Team. In this regard, the Panel would like to know how confidentiality is ensured.

K. Leadership is dedicated to fulfilling the 12 Commitments

K1	*How is the governing body and management held accountable for fulfilling their strategic promises, including accountability?*	3

The SIM Card which monitors organisational progress shows the KPIs for the Board and Trustees. The report lists the KPI's areas of focus, these were last updated in April 2021.

The Board's performance was recently reviewed by a third-party, and areas of improvement are listed within the report. The frequency of reviewing the Board's performance is also provided. These scheduled reviews and evaluations are positive practices in terms of supporting Board level accountability.

The Panel notes that the board undergoes an external evaluation every three years and sees that as **a good practice**.

K2	*What steps have you taken to ensure that staff are included in discussing progress toward commitments to organisational accountability?*	3

Sightsavers involves all staff across different teams to assemble the Accountable Now report. The report, alongside the feedback from the Panel are further shared with staff, who are then in turn are encouraged to share with their partners/stakeholders.

Sightsavers also has an internal Working Group on Transparency; they have put together an e-learning module on accountability and transparency to further

	sensitise staff on this topic. The Group supports the organisation to engage in further initiatives on transparency and accountability. The Panel would like to know whether staff from across all offices are involved in discussions around organisational accountability or whether they are limited to only certain offices. The Panel is also interested in hearing about how the e-learning module has been received by staff.	
K3	*What is your accountability report's scope of coverage? (i.e. are you reporting for the whole organisation or just the international secretariat?) What authority or influence do you have over national entities and how, specifically, are you using it to ensure compliance with the accountability commitments and to drive the overall accountability agenda?* Sightsavers continues to approach the reporting in a comprehensive and holistic manner, involving all seven of its subsidiaries and all teams in the development of the report. The report expands beyond the head office, is collated in collaboration with different teams and offices, and therefore the approach remains **a good practice.**	3