

Accountable Now

GLOBAL STANDARDS LOCAL TRUST



CBM – Christian Blind Mission Independent Review Panel Feedback

**CBM Accountability Report 2015
Review Round November 2016**



CBM – Christian Blind Mission

Feedback from the Independent Review Panel

Review Round November 2016

21 December 2016

Dear David Bainbridge,

Dear Dr. Rainer Brockhaus,

Thank you for submitting your Accountability Report. We, the Independent Review Panel of Accountable Now, appreciate your efforts to continuously strengthen your 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. Before we share this with you, however, we want to highlight a few issues of concern that we found throughout most of the nine reports assessed in the last review round.

Closing the feedback loop with stakeholders (NGO2, NGO9)

A [recent study](#) on 40 international civil society organisations' (CSOs') accountability practices - conducted by the *direct impact group* on behalf of Accountable Now - revealed that only three out of these 40 CSOs responded with an appropriate answer to a complaint test within three weeks.

This is alarming. All Members of Accountable Now should have a fully functioning feedback mechanisms in place. However, when checking your reports we found a consistent lack of reporting filed complaints per type, quantity, and region as well as a total lack of information on how they were resolved. We believe this is not an acceptable level of accountability. CSOs should not only have a mechanism in place but should first be capturing complaints with the appropriate level of detail and then monitoring their resolution and agreeing what actions need to be taken to ensure the same issues do not arise.

[Feedback Labs](#), with whom Accountable Now collaborated on the [Digital Accountability project](#), also serve as a valuable source of information on how to close feedback loops.



Collaboration with partners, communities and networks (NGO6, EC7 & SO1)

As part of the [10 Accountability Commitments](#), Accountable Now Members commit to working in genuine partnership with local communities and partners. With increased globalisation of information, more empowered citizens engage and civic space is challenged, it becomes ever more important to help local communities and partners to thrive. However, we found that coordination with local communities is still an overall weakness area among the Accountability Reports we received. Some “common” ICSSO practices can have intended or unintended consequences on local communities. We would thus like to particularly highlight a lack of contributions to building local capacity and resources. Do you take into account local market conditions and think about working alongside local organisations building their capacity? We suggest that ICSSOs should start to consider their impact on the sustainability and independence of local civil society in all their work (such as planning, budgeting, economic impact, etc.).

Adding to what people do to improve their lives (NGO3)

To state the obvious, impact measurement is important. However, many evaluations mentioned in received Accountability Reports focus on collecting relatively large amounts of data on people reached, however, this does not tell us much about the improvement in their lives. Moreover, we should critically ask ourselves: What is the ICSSO’s credit in this improvement and what positive impact is actually due to the people and beneficiaries themselves?

While we are of course aware that resources are limited, there is clearly no substitute for a robust and honest impact evaluation of our programmes and activities.

Organisation-specific feedback to CBM:

CBM’s seventh accountability report to Accountable Now is again very good, comprehensive and accessible. Some improvements (e.g. NGO9, SO1) are noticed in comparison to previous reports. CBM provides a great level of detail, categories and figures as well as accessible stories, demonstrating their claims towards accountability. At the same time, there is a great focus on what is important for this specific report.

Overall, CBM’s **institutional commitment** to accountability (towards CBM’s beneficiaries, partners, donors, the public, and peer organisations) remains strong. CBM regards accountability as “an integral and key value-adding function of its business and does so along the entire social value chain from donor to beneficiary creating transparency with



stakeholders and the general public". The organisation's global commitment to engagement is commendable as a means of true accountability to constituents.

While progress is evident, the Panel hopes that CBM will be able to provide more general **evidence** and input from partners (e.g. that partnership systems work well in practice or that staff uses CBM's anti-corruption policy) to demonstrate procedures actually work – as mentioned in previous feedback letters. Other **weakness** areas include the realistic collection of complaints and feedback received (NGO2), the fact that only 71% of completed staff appraisals in 2015 (LA12) and activities around ethical fundraising and communications (PR6). These areas are summarised in the Panel's updated **Improvement Analysis** which will serve as the basis for CBM's interim accountability report on 2016. As always, CBM is invited to shift these improvement priorities as they think fit.

It is greatly appreciated that CBM publishes membership with Accountable Now and all reports on their [website on 'Accountability'](#). Please update this website with the **new name and logo**.

Our intention is that this feedback letter, and any response you may wish to provide, is made publicly available on the Accountable Now website along with your report – as it is the case with all previously reviewed reports. However, should there be errors of fact in the feedback above or in the note below; we would of course wish to correct these before publication. Please share these comments or amendments by 25 January 2017.

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,

Mihir Bhatt

Rhonda Chapman

John Clark

Louise James

Jane Kiragu

Nora Lester Murad

Michael Roeskau

Saroeun Soeung



Cover Note on CBM's Accountability Report 2015

Review Round November 2016

PROFILE DISCLOSURES

I. Strategy and Analysis

1.1	<p>Statement from the most senior decision-maker</p> <p><i>Fully addressed</i></p> <p>The report's opening statement from Rainer Brockhaus, CBM's Chair of the International Leadership Team, provides a robust commitment to demonstrating accountability towards CBM's beneficiaries, partners, donors, the public and peer organisations. Based on its core value - i.e. integrity - CBM regards accountability as "an integral and key value-adding function of its business and does so along the entire social value chain from donor to beneficiary creating transparency with stakeholders and the general public". A strong emphasis is put on building partners' capacities and acting primarily as a facilitator for people with disabilities. It is appreciated that CBM highlights their vision of agency amongst its constituents - committing to service delivery for optimum potentials for persons with disabilities.</p> <p>The Panel highlights the importance of CBM's commitment to break the cycle of disability. There is a strong emphasis on the non-discriminatory nature of interventions across "the most disadvantaged societies irrespective of race, gender or religion ". CBM also strengthens internal feedback from staff and invested into an international Communications Manager to proactively ensure the diversity of feedback and contexts.</p> <p>The Panel appreciates that CBM found last year's feedback letter "encouraging and informative" and hopes that this feedback will trigger equally constructive processes as in 2015 (foreign exchange control mechanisms, global budgeting exercise, whistleblower systems etc.). The Panel also looks forward to hearing more on the new governance and management model for CBM in the 2016 accountability report.</p>
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II. Organisational Profile

2.1	<p>Name of organisation</p> <p><i>Fully addressed</i></p>
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2.2	<p>Primary activities</p> <p><i>Fully addressed</i></p> <p>The investment in indicator development is seen as another significant way of assuring accountability (Sendai framework). This moves CBM to an actor committed to identifying concrete footprints it makes and inclusions as an indicator is. A commitment to track and remain accountably to changes is appreciated.</p>
2.3 - 2.6	<p>Operational structure including national offices / Headquarter location / Number of countries / Nature of ownership</p> <p><i>Fully addressed</i></p> <p>As in previous years, very comprehensive information is provided in all answers, often supported by visuals and graphs which make the information very accessible and easy to understand. In 2014, the Global Programme Strategy was succeeded by the second Global Programme Strategy (GPS-II). It is also particularly interesting that CBM publishes the countries which it plans to exit soon.</p> <p>Moreover, the very detailed breakdown of programme expenses in each country, the geographical breakdown of persons served, as well as the accurate information on the organisation's scope in 2015 are highly informative and commendable.</p>
2.7	<p>Target audience</p> <p><i>Fully addressed</i></p> <p>The table presented on page 13 points to ca. 38 million people "served" and this number is also highlighted on CBM's website.</p>
2.8	<p>Scale of organisation</p> <p><i>Fully addressed</i></p> <p>On annual income and expenditure, CBM presents a figure of € 270 million (with a "Programme expenditure" of € 174 million) for the entire federation. On CBM's website, by comparison, the only major figure appearing is € 67 million for income/expenditure of CBM International.</p>
2.9	<p>Significant changes</p> <p><i>Fully addressed</i></p>
2.10	<p>Awards received</p> <p><i>Fully addressed</i></p>



	<p>CBM can again be commended for having received an impressive amount of awards for CBM supported projects in the reporting period (see Annex A).</p>
<h3>III. Report Parameters</h3>	
3.1 – 3.4	<p>Reporting period / Date of most recent report / Reporting Cycle / Contact person</p> <p><i>Fully addressed</i></p> <p>The last report (interim report on 2014) was submitted in October 2015.</p>
3.5	<p>Reporting process</p> <p><i>Fully addressed</i></p> <p>As in previous reports, the answer given provides well laid out information about the process for defining report content which is institutionalised and used to engage all functions of the organisation to think strategically about accountability as a key quality assurance tool. CBM seems to also use accountability and the reporting process to support building their own brand. There is a serious and systematic process of reviewing the Panel feedback - demonstrating high level commitment with investment for broader ownership and reflections as well as prioritising issues within the business plan. This ownership is cascaded to staff through its intranet.</p> <p>What are the experiences with the newly introduced Steering Committee for the Accountability Report 2015? And how has feedback from the CBM Federation impacted the report? Have there been any amendments due to internal or external feedback?</p> <p>The Panel would also like to draw CBM’s attention on Educo’s executive summary of their accountability reports which help to convey the reports’ messages in a more user-friendly and accessible manner with an external audience.</p>
3.6 – 3.7	<p>Report boundary / Specific limitations</p> <p><i>Fully addressed</i></p> <p>It is acknowledged that CBM does not have standardised data across all CBM entities due to different national regulations (e.g. environmental performance, human resources and finance). However, CBM should take responsibility for providing information on the entire federation. From 2016 onwards, CBM should endeavour to report on the whole CBM federation on the basis of the new Global Financing Reporting tool. This should accurate and comparable financial information for the whole CBM</p>



	Federation. While CBM states on page 19 it has no “global statistics on human resources ... of our Member Associations”, it does provide such figures, e.g. under LA1 (page 49).
3.8	<p>Basis for reporting</p> <p><i>Fully addressed</i></p> <p>It is understood that CBM does not have global statistics on HR, advocacy effectiveness or environmental performance for the entire CBM Family (see 3.6).</p> <p>However, with regard to systematic quality insurance, CBM monitors overall accountability and performance of the Federation’s entities via the International Family Finance Report (IFFR). Moreover, CBM has set out and monitors clear standards of accountability for each partner it works with.</p>
3.10 – 3.12	<p>Changes in reporting parameters / Reference table</p> <p><i>Fully addressed</i></p>
IV. Mission, Values, Governance, and Stakeholder Engagement	
4.1	<p>Governance structure</p> <p><i>Fully addressed</i></p> <p>CBM provides relevant information about their governance structure, different committees and decision-making processes. A Risk Task Force was introduced in 2015 with the aim to identify key risks for CBM and to ensure that risk is dealt with in an effective manner across the organisation. Does this Risk Task Force also ensure compliance of the CBM’s governance model with relevant regulations in the different jurisdictions?</p>
4.2 – 4.3	<p>Division of power between the governance body and management / Independence of Board Directors</p> <p><i>Fully addressed</i></p> <p>The table on page 22 is a great display of a complex governance structure.</p>
4.4	<p>Feedback from internal stakeholders</p> <p><i>Fully addressed</i></p> <p>CBM has various mechanisms in place to engage internal stakeholders – i.e. Member Associations and employees. The organisation regards the</p>



	<p>advantage of combined representation and competency-based International Board as to generate higher ownership of CBM's international work. Is there evidence for this? And are there concrete examples that staff and/or Member recommendations have shaped decision-making of the EMT?</p>
4.5	<p>Compensation for members of highest governance body <i>Fully addressed</i></p> <p>CBM has followed up on the Panel's previous request and is more explicit on its salary rates. These are generally in line with the collective bargaining agreement (AVR) which is the tariff agreement for several Christian-based organisations in Germany (see here in EUR). However, more details on executive pay (see the example from World Vision) and non-salary benefits would be useful. While the report remains rather general, CBM's German website presents figures (page 35 of the recent Annual Report), e.g. management level salaries can vary between € 4.382 and € 9.387 per month.</p>
4.6	<p>Conflicts of interests <i>Fully addressed</i></p> <p>CBM is asked to provide a link to the mentioned conflict of interest policy in the next full report.</p>
4.10	<p>Process to support highest governance body's own performance <i>Partially addressed</i></p> <p>CBM is again encouraged to describe how results from the mentioned annual self-reviews of Board performance are used to further improve the effectiveness of this body. As also asked in a previous Panel feedback, it would be helpful for the reader if there was either a direct link to the Articles of Association or if the relevant part on term limits etc. was clarified in this answer. It is not clear why the annual performance review process does not lead to an annual outcome report - or what is the expected outcome of the Personnel and Compensation Committee planned for 2016?</p>
4.12	<p>Social charters, principles or other initiatives to which the organisation subscribes <i>Fully addressed</i></p>
4.14	<p>List of stakeholders <i>Fully addressed</i></p>



	CBM can be again commended for a very detailed and comprehensive breakdown of its stakeholders.
4.15	<p><i>Basis for identification of stakeholders</i></p> <p><i>Fully addressed</i></p> <p>The Panel very positively notes CBM’s different approaches for identification, selection, and prioritisation of (new) stakeholders (e.g. situational analyses or disaster risk reduction analyses). How have these processes resulted in good partnerships with key stakeholder groups? It is suggested to report on the result in terms of accountability issues for every action.</p>

PERFORMANCE INDICATORS

I. Programme Effectiveness

NGO1	<p><i>Involvement of affected stakeholder groups</i></p> <p><i>Fully addressed</i></p> <p>CBM takes the engagement of stakeholders very seriously and shows strong efforts to listen to their stakeholders. This is particularly important since CBM “typically does not implement its own projects, but generally delivers its programmes in collaboration with partner organisations” (page 28). Their Inclusive Project Cycle Management (IPCM) follows a transparent approach and puts focus on joint planning, partners’ ownership and community involvement. Trainings on IPCM focused on finding ways to include stakeholders from various levels in all stages of the project management cycle.</p> <p>Lots of illustrative country examples provide evidence on the meaningful stakeholder engagement processes. Practical tangible infrastructure is demonstrated by Pakistan’s community based inclusive network, Indonesia’s Disability Inclusive Development team or Philippine’s coalition shadow reporting on inclusive budget advocacy.</p>
NGO2	<p><i>Mechanisms for feedback and complaints</i></p> <p><i>Addressed</i></p> <p>CBM has an external programme feedback system in place since 2014. The feedback and complaints handling position paper is available on their</p>



	<p>website. A Feedback Manager is responsible to follow up on feedback received and to forward it to CBM’s respective units. The whole process is visually demonstrated in the report’s Appendix B.</p> <p>Overall, it seems very low and almost alarming to have received only two cases of complaints or feedback in 2015. It would be interesting to know CBM’s internal definition of a “complaint” in this regard.</p>
NGO3	<p><i>Programme monitoring, evaluation and learning</i></p> <p><i>Addressed</i></p> <p>The Panel appreciates the recognition that qualitative data is not sufficient to track changes in individual and families’ lives. CBM continued its efforts to develop and invest into its monitoring, evaluation, and learning systems in 2015 as well as to make them more coherent and standardised. Results include the Reference Guides to support project planning, the log frame/budget-based quarterly Project Progress Report (PPR) to support ongoing monitoring; and reporting on progress towards the set objectives and enhancing the use of evaluation results to learn from experience. It would be useful to see concrete examples and learn how the knowledge gained is influencing adaption of new activities in next full report.</p> <p>The Panel looks forward to further refinement of the already useful Monitoring on Inclusion (MOI) tool. Actual evidence how evaluations were translated into management responses that supported adjustment and enhancement of project activities will be appreciated in the next full report. The Panel would like to point out that as CBM does not itself execute its projects (page 28), MEL is used as a means to control the “subcontractors”. At the same time CBM admits it “does not conduct post-intervention evaluations yet” (page 56).</p>
NGO4	<p><i>Gender and diversity</i></p> <p><i>Addressed</i></p> <p><i>Part of Interim Report on 2014</i></p> <p>A Senior Advisor for Disability and Gender Equality was replaced in 2016, framing gender equality as integral to disability-inclusive development and develop internal processes to ensure it is included in all levels of CBM’s work.</p> <p>The Panel looks forward to updates on the new position paper on disability and gender equality (including outcomes of the dialogues) which was supposed to be included in this report. Will this serve as the basis for an overall gender or diversity policy? Diversity issues should also cover religion and how CBM deals with non-Christians in their programmes. The 2014 interim</p>



	<p>report mentioned that some of CBM’s sub-offices and partners have drafted Gender Policies for their regions. Moreover, improving women's visibility may need to go beyond their participation in forums and see how specific concerns for women are integrated and refined in program activities.</p> <p>The CBM described in the previous interim report that with current monitoring systems becoming more gender and disability sensitive, they are positive to be able to build further data out of which measurable indicators and improvement targets can be developed in the coming years. The Panel looks forward to advancements in this regard. The Panel will also appreciate more information on the development of an inclusive employment practice (belonging to HR issues covered under LA13).</p>
NGO5	<p><i>Advocacy positions and public awareness campaigns</i> <i>Fully addressed</i> <i>Part of Interim Report on 2014</i></p> <p>CBM overall commits to the principles of evidence based, truthful, and effective communication that is respectful to people’s dignity. While the majority of advocacy programmes is conducted by Member Associations, who bear the responsibility for corrective actions (information would be useful in this report), the newly introduced Community of Practice (which oversees all of CBM’s advocacy work) will help to reflect upon adjustments and exit strategies. This community of practice is seen as a potential model for globalising accountability. CBM is commended for creative action towards responding to Panel recommendations.</p> <p>The Panel welcomes the establishment of a <i>permanent</i> feedback mechanism from the International Advocacy and Alliances (IAA) department. Responses with regard to fundraising feedback tools and complaints received will be covered under PR6.</p>
NGO6	<p><i>Coordination with other actors</i> <i>Fully addressed</i></p> <p>CBM takes a collaborative approach in all its work including objective tools for situational analysis used for stakeholder analysis as well as conducting partner assessments. The latter one is based on the following criteria: Governance / management / institutional capacity, financial health, and programme / technical capacity. SO1 (page 55) even mentions that CBM’s new Child Safeguarding Policy is included in every partnership contract since</p>



	<p>2015. How does CBM ensure that partners also adhere to other accountability commitments made at CBM’s headquarter level?</p> <p>Overall, the revised Global Programme Strategy (GPS II) strengthens the organisation’s collaborative work approach. The report further mentions under 2.2 (page 8) that CBM’s Emergency Response Team supports partners to implement a beneficiary satisfaction survey (infused feedback during and after the end of the project) which is positively noted. Nevertheless, evidence that these systems work well in practice and how success is tracked are welcome in the next report.</p> <p>Please also provide more information about CBM’s local partners and the two-way exchange CBM applies to shape each other’s work.</p>
<h2 style="margin: 0;">II. Financial Management</h2>	
<p>NGO7</p>	<p>Resource allocation</p> <p><i>Addressed</i></p> <p>As in previous years, the report outlines (in a very detailed manner) CBM’s very robust effective resource allocation and monitoring system that is aligned to the organisation’s strategies and includes strong controls in place at the programme, administration and finance level.</p> <p>In particular, CBM’s new Risk Management Approach, following the PDCA-cycle principles (Plan-Do-Check-Act), and visually presented on page 41, is very commendable. CBM International’s Risk Register, quarterly risk reports to Executive Management, and “almost real time management of CBM risks” are also positively noted in this regard and will be followed up upon in the future.</p> <p>However, a link to the published annual audited financial report is a mandatory requirement for this answer.</p>
<p>NGO8</p>	<p>Sources of Funding</p> <p><i>Fully addressed</i></p> <p>CBM International cannot report on the five largest donors since this information that is specific to Member associations. However, they provide the five largest donor groups in 2015. Moreover, similar to Sightsavers, CBM receives large support in gifts-in-kind (ca. 43%) from MSD-Merck Sharp & Dome who provide Mectizan tablets. By contrast, government funding is relatively low (ca. 6%).</p>



	CBM is commended for increasing their independent income basis from individual funders.
III. Environmental Management	
EN16	<p>Greenhouse gas emissions of operations</p> <p><i>Fully addressed</i></p> <p>CBM is commended for reporting its carbon footprint on CBM International Office in Bensheim, the office in Brussels and all regional offices, using the Green House Gas Protocol (GHGP). The CBM also includes their Carbon Footprint Report 2014 because the 2015 report is still underway and the interim accountability report on 2014 did not cover any environmental issues. The Panel looks forward to this 2015 report.</p>
EN18	<p>Initiatives to reduce emissions of operations</p> <p><i>Fully addressed</i></p> <p>Reducing CBM's environmental footprint is part of the Executive Management Team's responsibilities. Moreover, CBM can be commended for an exemplary environmental-friendly new office building.</p> <p>The report on 2013 mentioned that an Environmental Sustainability Advisory Working Group was developing an Environmental Management System (EMS). The Panel would be interested in an update on this work.</p>
EN26	<p>Initiatives to mitigate environmental impact of activities and services</p> <p><i>Fully addressed</i></p> <p>CBM asks for environmental assessments in its programme designs, in order to minimise / mitigate environmental impacts. Interesting examples of CBM's programmes on environmental sustainability and mainstreaming disability inclusion into environmental activities are provided (e.g. link with SDGs and documentation of environmental sustainability through Cambodian case study).</p>
IV. Human Resource Management	
LA1	<p>Size and composition of workforce</p> <p><i>Fully addressed</i></p> <p>Very comprehensive information is provided on the size, composition, contract types and geographical allocation of CBM's workforce. How many volunteers supported CBM in 2015?</p>



EC7	<p>Procedure for local hiring</p> <p><i>Fully addressed</i></p> <p>Detailed numbers for expatriate and local staff members in the different offices are provided under LA1 (page 49). In previous years, the practice of working remotely has helped to hire staff from different regions. The Panel appreciates CBM’s commitment on tapping into local capacities – both as an accountability measure and a sustainability one. However, there is no clear strategy to move to more localisation.</p> <p>The Regional Director decides whether to recruit internationally based on certain assessments. While many mid-level positions are staffed locally, 7 out of 8 regional offices are still headed by an expatriate. In light of this shortcoming and in order to underline CBM’s commitment to promote local recruitment, the Panel recommends putting a formal policy into place and tracking improvements.</p> <p>Moreover, what is the relationship of salaries to local standards?</p>
LA10	<p>Workforce training</p> <p><i>Fully addressed</i></p> <p>It is appreciated that CBM identifies training needs by running a gap analysis between job requirements and the job holder’s qualifications as well as implementing competency models for each job. Appraisals are also used to identify training needs and to discuss feedback on conducted trainings. However, there is no formalised assessment of whether training leads to performance improvements. The Panel suggests to invest more in ascertaining how training links with performance so as to complete the accountability loop.</p> <p>All CBM offices are advised to spend 580 EUR per employee on annual training. The average training time per employee was 3.2 days in 2015. Which regions were the ones with high training activity in this regard? Moreover, the report for 2013 mentioned that 78% of staff had participated in at least one training course during that year. For comparable reasons, it would be interesting to know of many employees participated in training in 2015.</p> <p>CBM is encouraged to think about other technological solutions (e.g. social media) to help staff improving their jobs around accountability issues.</p>
LA12	<p>Global talent management</p> <p><i>Partially addressed</i></p>



	<p>This area was part of the interim report 2014. The Panel positively noted in this previous feedback that CBM redesigned their performance appraisal forms and made them more accessible. Has this led to a higher implementation rate? 71% of completed appraisals in 2015 still seem comparably low. Have these appraisals improved the coherence and effectiveness of staff in achieving strategic goals?</p> <p>Moreover: How has streamlining the performance appraisal process and basing it firmly on the Competency Model developed? As asked by the Panel previously: How does the introduction of the Individual Development Dialogue tool differ from performance appraisals and how are they linked?</p>
LA13	<p><i>Diversity of workforce and governance bodies</i> <i>Addressed</i> Part of Interim Report on 2014</p> <p>CBM still does not have an explicit guideline on diversity or inclusive HR in place although it is embedded in most HR core processes such as recruitment. How do these HR processes deal with recruiting non-Christian staff?</p> <p>The target for employing persons with a disability in each office is 6%, increasing to 10% once the initial target has been achieved. The current percentage of employees with disabilities is in average 9% of the whole workforce. Gender diversity varies greatly between the International Office (with almost 80% women) and expatriate posts (with only 35% women). Moreover, “the higher up the hierarchy, the smaller the percentage of women” and there is unfortunately no woman represented at EMT level. The Panel strongly supports CBM to encourage greater gender balance and to promote women to leadership positions – even if there is no concrete target in place.</p> <p>The previous report mentioned a new internship programme which requires 50% of interns to have a disability. Has this target been achieved? Moreover, does CBM plan to analyse other diversity issues in the future, such as age or a minority background?</p>
NGO9	<p><i>Mechanisms to raise grievances</i> <i>Fully addressed</i></p> <p>CBM International has a staff council in Germany which contributes to alleviating grievances in the workplace. For those employees not based in Germany, CBM installed a dispute resolution process (DRP) which was rolled-out to all regions. CBM openly describes cases of staff grievances which could all be resolved. In addition, a whistleblower process was installed.</p>



V. Responsible Management of Impacts on Society	
SO1	<p><i>Managing your impact on local communities</i></p> <p><i>Fully addressed</i></p> <p>Generally, CBM considers good practice “to include participatory methods in evaluation allowing persons with disabilities to be part of the process, to make their voices heard and to share and receive feedback.” However, at times, the tone is rather paternalistic for this section. The organisation provides information on how they raise awareness and about the new Child Safeguarding Policy. Moreover, CBM provides interesting community examples to underline the impact of their work.</p> <p>They neither work with formal exit strategies or post-intervention evaluations but seem to have a solid practice in place. Moreover, CBM is encouraged to roll out its feedback mechanisms to the local level. It is further commendable that CBM explicitly informs partners about the confidential online reporting channels amongst others; however, the Panel would like to see this tool to be fully accessible as soon as possible. Have there been other concerns raised from communities in 2015 beyond the ones mentioned in relation to safeguarding?</p>
SO3	<p><i>Anti-corruption practices</i></p> <p><i>Addressed</i></p> <p>CBM has very solid risk assessment and anti-corruption mechanisms in place: Internal audit field level checks, internal audit red flag reporting, whistleblower system, Standing Operating Procedure (SOP) for critical incident reporting, and trainings. The Panel looks forward to CBM reaching their target of training 500 employees by mid-2017 on prevention of corruption and fraud (e-learning).</p> <p>The 2014 report stated that a policy to prevent corruption and fraud in all activities and operations was approved and implemented in the beginning of that year. The Panel would still appreciate evidence whether this policy is well known and used by staff.</p>
SO4	<p><i>Actions taken in response of corruption incidents</i></p> <p><i>Fully addressed</i></p> <p>The answer gives a comprehensive overview of 53 critical incidents occurred in 2015 (detected through the red flag system or reported through the whistleblower system). Are such incidents published anywhere else than in this report?</p>



VI. Ethical Fundraising

PR6

Ethical fundraising and marketing communications

Partially addressed

Member Associations adhere to the ethical and fundraising codes in their respective countries. As already requested for the 2013 report, a link to the mentioned policy on the ethical and respectful use of pictures would be welcome in the next report.

The report says that complaints are “usually” received and responded to by the local Member Associations and serious complaints are addressed by the International President. More concrete information will be welcome for the next report.

NGO5 mentions that a number of disability activists from the Middle East complained about a CBM fundraising campaign, as they felt it did not portray persons with disabilities in the right way (page 36). It is furthermore explained what CBM did to resolve this issue. How many in total and what other kind of complaints did CBM receive with regard to their fundraising and communications activities?

Finally, CBM requested support from the Panel or other Accountable Now Members on how to attract critical feedback in particular. The [UK Fundraising Regulator](#) suggests anonymity and confidentiality in this regard. Moreover, the Panel has checked the profiles of CBM on [Great Nonprofits](#) and [Charity Navigator](#) – both independent feedback platforms in the United States. We found two positive reviews, including one from a donor, on the first platform while no reviews on the other platform. The Panel thinks that these and other independent feedback platforms can be a good source for soliciting feedback from donors and other stakeholders. Relevant ideas in this regard can include embedding these platforms on the website to increase the chance of getting feedback. There is also much to learn from the private sector in this regard by proactively using digital technology to solicit feedback through applications such as [ekomi](#).