hqai
HUMANITARIAN QUALITY
ASSURANCE INITIATIVE

Mid-Term Audit – Summary Report
COAST-MTA-2019

Date of report: 2019/12/12

1. General information

Organisation	COAST Trust (Coastal Association for Social Transformation Trust)	
Type	**Mandates**	**Verified mandates**
☒ National ☐ Membership/Network ☐ Direct Assistance ☐ International ☐ Federated ☐ With partners	☒ Humanitarian ☒ Development ☒ Advocacy	☒ Humanitarian ☒ Development ☒ Advocacy
Head office location	Dhaka, Bangladesh	
Total number of programme sites	6	**Total number of staff** 1476

Audit team	
Lead auditor	Jo Thomson
Second auditor	Sarah Kambarami
Third auditor	
Observer	
Expert	
Other	

Scope of the audit

	CHS Verification Scheme			
Audit Stage	Certification	Independent Verification	Benchmarking	Other
Initial audit (IA)	☐	☐	☐	☐
First maintenance audit (MA1)	☐	☐	☐	☐
Mid-term audit (MTA)	☒	☐	☐	☐
Second maintenance audit (MA2)	☐	☐	☐	☐
Recertification audit (RA)	☐	☐	☐	☐
Extraordinary audit	☐	☐	☐	☐
Short notice	☐	☐	☐	☐
Other *(specify)*	☐	☐	☐	☐

Sampling

Randomly sampled project sites	Included in final sample *(Yes/No)*	Replaced by	Rationale / Comments *(If random sample not included explain why and give rationale for selected country programme)*	Onsite visit / remote assessment
Child Protection UNICEF Camp 14 Ukhiya, Upazilla, Cox's Bazar District.	yes		Had not been sampled previously.	On site
Youth/NRC Palonkhali Union, Ukhiya Upazilla, Coxs Bazar district	no	Dry-fish Livelihoods Cox's Bazar Sadar and Moheshkhali Upazilla of Cox's Bazar district.	Randomly sampled project was small with few beneficiaries. Replacement project was also a development project, in the same area, larger, and with higher number of beneficiaries.	On site

Climate Justice Resilience Fund Advocacy Project	yes		Chosen because it was advocacy project in order to cover full scope of audit.	Remote (documents only)

Add any other sampling performed for this audit (*for example federations, regional offices, etc.*): None.

It is important to note that the audit findings are based on a sample of an organisation's country programmes, its documentation and observation. Findings are analysed to determine an organisation's systematic approach and application of all aspects of the CHS across different contexts and ways of working.

2. Activities undertaken by the audit team

Locations assessed

Locations (offices, projects at country programme level	Dates	Onsite visit / remote assessment
Rohingya Camp 1, Kutupalong, Ukhiya.	2019/11/12	On-site
Nidaniya, Ukhiya	2019/11/12	On-site
Rohingya Camp 14, Hakimpara	2019/11/13	On-site
Nazirertek, Cox's Bazar	2019/11/14	On-site
Nuniar Chora, Cox's Bazar.	2019/11/14	On-site
National advocacy programme - Khulna, Chottogram, Noakhali, Cox's bazar, Barisal and Bhola District.		Remote (documents only)

Interviews

Position / level of interviewees (add information as necessary)	Number of interviewees
Principal Office Dhaka	8
Field Office(s) Cox's Bazar	4
Field Office - UROC	3
Project Site staff	3
Total number of interviewees	**18**

Consultations with communities

Type of group	Number of participants	
	Female	Male
Education - learning centre	2	11
Child Protection - multipurpose training centre	15	
Child Protection - multipurpose training centre	9	
Education - learning centre		11
Livelihoods	7	
Livelihoods		10
Total number of participants	**33**	**32**

Opening meeting

Date	2019/11/10
Location	Dhaka
Number of participants	29
Any substantive issues arising	No

Closing meeting

Date	2019/11/15
Location	Dhaka
Number of participants	9
Any substantive issues arising	No

Programme site(s)

Briefings	
Date	1. 2019/11/11 2. 2019/11/12
Location	1. Cox's' Bazar 2. UROC
Number of participants	1. 18 2. 31
Any substantive issues arising	No

De-briefings	
Date	None undertaken
Location	
Number of participants	
Any substantive issues arising	

3. Lead auditor recommendation

In our opinion, COAST Trust has implemented the necessary actions to close the minor CARs identified in the previous audit and continues to conform with the requirements of the Core Humanitarian Standard on Quality and Accountability. We recommend maintenance of certification.

Name and signature of lead auditor: Jo Thomson	Date and place: 2019/12/12 Australia

4. HQAI decision

Certificate:

☒ Certificate maintained	☐ Certificate reinstated
☐ Certificate suspended	☐ Certificate withdrawn

Next audits	
Maintenance audit before 2021-01-06	
Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative	Date: 2019-12-13

5. Background information on the organisation

Governance and management structure	The Initial Audit of COAST Trust took place in October 2017 and the first Maintenance Audit in November 2018. COAST continues to have a 21-member General Council (GC) and Seven-member Executive Committee (EC) responsible for the governance of the organisation. The EC and GC approves new projects, policies and budgets, monitors risks and delegates day-to-day management to the Executive Director who is responsible for the overall management of the organisation in line with COAST's Mission, Vision and Values. The Executive Director is supported by a Senior Management Team which was expanded in 2019. It now consists of the Executive Director, one Director, four Deputy Directors and five Assistant Directors. One of the new Assistant Directors is responsible for Monitoring, Evaluation, Learning and Humanitarian Accountability (MEL & HA). To support the management of the work outside of Dhaka, each project has a Project/Programme Coordinator/Manager, who reports to their focal point in the Principal Office. In the two main regions of Bhola and Cox's Bazar, Regional Team Leaders are appointed to support decentralised, administrative management. This is in addition to their main role and they are responsible for representing the organisation at a regional level to the government stakeholders and to act as administrative supervisor of the project leaders. The People's Organisation (PO) are a community institution comprising of elected members of COAST's micro-finance programme. Two elected representatives from the PO are on the Board of COAST, providing a link between communities and the governance of the organisation.
Effectiveness of the internal quality assurance systems	Since the Initial Audit in 2017, the most significant changes to quality assurance include the allocation of additional resources in the area of Monitoring, Evaluation, Accountability and Learning (MEAL). This includes the new position of Assistant Director for MEL & HA and the development of a new MEAL Policy and framework which was finalised in February 2019. In addition, a Head of MEAL and Social Development was appointed as well as a Head of Humanitarian Response, who has specific responsibility for ensuring the quality of the humanitarian response projects in Cox's Bazar. Resources for the Assistant Director-MEL&HA and Head of Humanitarian Response were allocated from COAST Trust's own income. Regional Gender Focal Points are also now in place, conducting gender and prevention of sexual exploitation and abuse (PSEA) related meetings with all female project staff twice a month, reporting into the Gender Focal Point at the Principal Office.

	Other aspects of quality assurance that have changed include the introduction of a Project Leadership Review, and quarterly focus group discussions with beneficiaries to better understand aspects of programme quality as well as any unintended effects. The system for offsite monitoring has been strengthened including bimonthly 2-day Project Performance Monitoring Meetings (PPMM) to review the quality of project implementation.
Work with partner organisations	There has been no change in the way that COAST works with partners since the Initial Audit in 2017. COAST is a self-implementing Bangladeshi organisation that does not work with implementing partners. It receives funding from donors, or generates its own income, and self-implements all the projects.

6. Overall performance of the organisation

Effectiveness of the management system in resolving the non-conformities	The initial audit in 2017 noted COAST's strengths in coordinating assistance with other actors, effective use of financial resources, transparent information provision, strong organisational values and motivated staff. Weaknesses identified were a lack of clear programmatic policy guidelines overall, with corrective actions required in evaluation policy, identifying and acting upon unintended negative effects, safeguarding of personal information, collection of feedback, complaints handling, learning, staff code of conduct and approaches taken to ensure staff security and well-being. Improvements made by COAST since the last audit have addressed all the previous CARs.

COAST's commitment to learning and continual improvement, its independent and sustainable financial situation and its focus in just one country has enabled it to relatively quickly develop the new policies, procedures and implementation processes required to address the previously identified weaknesses.

COAST has established new senior positions for MEAL, complaints management and gender; has developed a range of new policies and associated procedures and tools; initiated extensive staff training; and established a formal beneficiary consultation and feedback process. These improvements have been driven by the Executive Director and Senior Management Team with the full support of the Board of Trustees. |
| **Overall organisational performance in the application of the CHS** | COAST has implemented the necessary actions to close the minor CARs identified in the previous audits and conforms with the requirements of the CHS.

Areas of particular strength include: context analysis; rapid and localised humanitarian response capacity; the application of technical standards; the development of local leadership and capacity; procedures to monitor negative effects of programmes; engagement and consultation with communities and people affected by crisis; external communications and transparent sharing of information; monitoring of issues related to gender for staff and communities; coordination with other actors; systems for monitoring and learning; oversight of staff performance and security and wellbeing; effective management of financial resources; strong organisational values; and motivated staff.

Some areas for improvement remain and these include, data disaggregation throughout the whole organisation to inform programme management decisions; systematic transition or exit planning; and the incorporation of stand-alone or formal evaluations into the otherwise strong MEAL system. |

Organisational performance in the application of the CHS

Commitment	Strong points and areas for improvement	Feedback from communities	Av. Score
1: Humanitarian assistance is appropriate and relevant	COAST has policy level commitments in place to provide impartial assistance based on the needs and capacities of vulnerable communities. COAST has systematic processes in place to analyse the context and stakeholders both through formal needs assessments that feed into the design of programmes, as well as in an ongoing manner through regular collection and analysis of feedback from the affected communities. COAST designs programmes based on need and a good understanding of the context and of people's vulnerabilities and capacities. As a Bangladeshi organisation, the staff of COAST have a particularly in-depth understanding of the context. There is strong evidence of COAST's willingness to adapt programmes to changing needs, capacities and context, in particular making adaptations in response to feedback from the affected communities. An area for improvement is to strengthen the policy level commitment and monitoring practices in relation to collecting and analysing disaggregated data to ensure that diverse target groups are benefitting from COAST's programmes.	Communities are satisfied that the programmes implemented by COAST are relevant and appropriate to addressing their needs. The communities consistently state that they feel respected by COAST and that COAST staff are trustworthy. They consider COAST to be non-discriminatory and feel able to complain if they felt there was any discrimination. They consider that the action taken by COAST takes account of their skills and capacities and is adapted by COAST based on their feedback.	2.8
2: Humanitarian response is effective and timely	COAST designs programmes that are realistic and safe for communities. A particular strength is COAST's ability to respond in a timely manner. COAST has its own financial resources from the micro finance programme surplus which can be activated quickly in an emergency. COAST has a clear Stand-by and Disaster Policy and Contingency Plan which empowers managers to redeploy staff and use funds within set limits to respond rapidly to disasters such as cyclones. Decisions are taken quickly, and staff act without delay. COAST has a strong monitoring system in place and adapts programmes based on the evidence that it generates. COAST has a policy in place for systematic, objective and ongoing monitoring and review of activities and their effects. COAST systematically uses relevant technical standards and good practice to plan and implement their programmes. COAST refers unmet needs to other organisations or supports the communities to advocate to the relevant authorities to meet their needs, such as local government, community leaders or to the camp management in the refugee camps.	The communities consistently state that the timeliness of the assistance they receive from COAST, and COAST's response to their feedback during implementation, is good. The communities expressed satisfaction that COAST is honest and transparent about what it can and cannot do and when COAST cannot meet their needs they refer those needs to other organisations with the relevant expertise, or they advocate with the communities to the relevant authorities. The communities are satisfied that their needs are being met effectively by COAST and they consistently cite examples of how COAST's monitoring processes enable them to make suggestions to adapt and improve the projects.	3.0

3: Humanitarian response strengthens local capacities and avoids negative effects	COAST's programmes strengthen local capacities, both in the poor and marginalised Bangladeshi communities and in the Rohingya refugee camps. Vocational training, life skills projects and the micro finance programme all strengthen local capacities and improve the resilience of the communities. COAST further improves resilience by working with communities on disaster preparedness and contingency planning. COAST enables the development of local leadership by supporting the establishment of programme level committees, for example with People's Organisations, parents at learning centres or with groups of dry fish producers. COAST pro-actively identifies unintended negative effects across a range of areas and takes action in a timely and systematic manner when a negative effect is identified. COAST has put specific systems in place to strengthen this aspect, such as the Gender Focal Points, the Complaints Mechanism and a regular feedback process for communities to self-identify unintended negative effects. COAST's procurement policy encourages staff to purchase project supplies from local markets whenever possible to benefit the local economy.	Communities can identify when there have been negative effects from COAST's activities and what action was taken as a result to mitigate those effects. The communities are able to describe the plans in place to reduce risk in different areas, for example, they know what to do if they have a complaint to make about unacceptable behaviour of COAST staff and they also have plans in place in case of natural disasters, such as cyclones or flooding during the monsoon season. Communities consistently identify how local capacities are being strengthened by COAST, both in terms of gaining new skills such as tailoring, computing and improved methods for drying fish, as well as leadership capacities through involvement in project related committees. Most communities know when their project is ending but do not know what will happen after that.	2.8
4: Humanitarian response is based on communication, participation and feedback	COAST's Information Disclosure Policy commits it to transparency, sharing information with communities affected by crisis, employees and other parties through a range of mediums. COAST's website is content rich, accurate, regularly updated and demonstrates a strong commitment to transparency. COAST has a systematic process of communicating with and seeking feedback from communities affected by crisis on the organisation, expected behaviours of staff, its programmes, the issues that affect them and unintended negative impacts. COAST establishes representative management committees with communities. COAST has an established system of regular meetings at all levels of the organisation to share information and reflect on results.	Community members consistently articulated their satisfaction with the provision of information by COAST. All communications observed between COAST staff and community members was easily understood, respectful and culturally appropriate. Community members reported their satisfaction with their participation and engagement with COAST. Community members consistently reported that they were able to provide feedback to COAST on their level of satisfaction with the quality and effectiveness of assistance provided.	3.0
5: Complaints are welcomed and addressed	COAST has the policies, procedures and practices in place to welcome and address complaints. COAST has strengthened its CRM policy and procedures, which includes: consultations with communities on their preferred complaints mechanisms; good communications with staff and communities to ensure they understand and can access the CRM and understand the expected behaviours of staff; the establishment of procedures, reporting tools and structures to receive, investigate and manage complaints;	Community members articulated their preferences for communicating complaints to COAST, confirmed that COAST had consulted with them and responded to their preferences and felt that their complaints would be responded to in a timely and fair manner by COAST. Community members stated that COAST	3.0

	commitment to prioritising the safety of complainants; an increased focus on the prevention of sexual exploitation and abuse; and the mechanism to refer complaints beyond the scope of COAST to other relevant organisations.	continued to discuss the CRM and its implementation with them.	
6: Humanitarian response is coordinated and complementary	COAST has the policies, procedures and practices in place to coordinate and complement the activities of other actors. COAST's Stand-by Disaster Policy and Contingency Plan and 'Do's and Don'ts for Emergency Response' guidance document commits them to humanitarian responses that are coordinated and complementary. Coordination with other actors is a particular strength of COAST. They lead a number of advocacy networks in Bangladesh and coordinate with all government and non-government bodies in their Rohingya response. COAST only works with partners where it is the implementer and these partnerships are governed by agreements and project design documents.	Communities reported that COAST's inputs and support was well coordinated with other actors such as UNICEF and that they could communicate any concerns in this regard to COAST through programme management committees and beneficiary feedback processes.	3.2
7: Humanitarian actors continuously learn and improve	COAST has the policies, procedures and practices in place to continuously learn and improve and has increased its investment in MEAL. COAST has implemented its new MEAL policy, and strengthened its MEAL team, monitoring and reporting mechanisms and tools. This includes regular programmes meetings using standardised monitoring and reporting tools to share information and use it to learn and improve programmes. It also includes mechanisms to seek feedback from communities and assess programme progress and results. An area for improvement for COAST is to further develop the practice of stand-alone or formal evaluations for their programmes.	Community members consistently reported that their views and experiences were sought and had influenced the detail of programme implementation and had led to innovations and changes in programmes.	2.8
8: Staff are supported to do their job effectively, and are treated fairly and equitably	The capacity and commitment of its staff is a particular strength for COAST. COAST's Human Resources Manual provides the policies and procedures to ensure staff are supported to their job effectively and are treated fairly and equitably. All staff have job descriptions (terms of reference), receive regular training on policies and have annual performance appraisals. COAST has fully implemented its staff code of conduct which obliges staff not to exploit, abuse or discriminate against people. COAST has an excellent Security Management and Staff Wellbeing Policy which includes a number of strategies to facilitate the employment, safety and security of women in office and field positions.	Community members consistently reported that staff have the necessary competencies to fulfil their roles. All staff interviewed were familiar with key policies and confirmed attendance at orientation/training on key policies. Community members consistently reported that they were aware of the expected staff behaviours and COAST's code of conduct.	3.0

| 9: Resources are managed and used responsibly for their intended purpose | COAST has a range of policies and processes in place to ensure that resources are used responsibly and for their intended purpose. The Human Resource Manual was revised in 2019 and includes a Green Policy, Anti-Corruption Policy, Whistleblowing Policy and guidance for staff on accepting resources ethically. Additionally, a new Risk Assessment Policy is being implemented throughout the organisation. COAST has a strong and robust approach to monitoring and reporting expenditure against budget on a regular basis, with the results informing programmatic decisions. The Procurement Policy enables staff to balance quality, cost and timeliness when making purchasing decisions. COAST staff consider the impact of their work on the environment and regularly quote the Green Policy. COAST manages the risk of corruption and takes appropriate action if it is identified, including applying their zero-tolerance approach by dismissing staff when necessary. | Communities consistently state that they are satisfied with the way that COAST uses its resources. Communities consider that there is no wastage of resources by COAST and they are satisfied that the resources are being used for the intended purpose. | 3.2 |

7. Summary of non-conformities

Corrective Action Requests (CAR) / Weaknesses *(YYYY – indicator)*	Type (minor / major)	Close-out due date *(YYYY/MM/DD)*	Date closed out *(YYYY/MM/DD)*
2019 - 3.4: COAST does not systematically plan a transition or exit strategy in the early stages of its programmes.	Minor	2021/12/12	
2017 - 3.6: CT does not identify potential or actual unintended negative effects in a timely and systematic manner in the areas of: sexual exploitation and abuse by staff, gender relations, and livelihoods.	Minor	2018/11/30 extended to 2019/11/30	2019/12/12
Initial Audit Nov 2017 – 3.8: Systems are not in place to safeguard any personal information collected from communities and people affected by crisis that could put them at risk.	Minor	2018/11/30 extended to 2019/11/30	2019/12/12
Initial Audit Nov 2017 – 4.4: Communities and people affected by crisis are not systematically encouraged by COAST to provide feedback on their level of satisfaction with the quality and effectiveness of assistance. No attention is paid to the gender, age and diversity of those giving feedback.	Minor	2019/11/30	2019/12/12
Initial Audit Nov 2017 – 5.5: COAST complaints are not consistently acted upon according to defined policies and processes.	Minor	2019/11/30	2019/12/12
Initial Audit Nov 2017 – 5.6: People affected by crisis are not aware of the expected behaviour of COAST staff, including commitments on the prevention of sexual exploitation and abuse.	Minor	2018/11/30 extended to 2019/11/30	2019/12/12

Initial Audit Nov 2017 – 8.2: Staff are not all aware of the policies that concern them, and specifically on child protection.	Minor	2018/11/30 extended to 2019/11/30	2019/12/12
Major CAR Audit June 2019 – 8.7: Coast Trust has not yet demonstrated that its code of conduct is fully in place.	Minor	2019/11/30	2019/12/12
Initial Audit Nov 2017-8.9: COAST does not have policies in place for the security and well- being of staff.	Minor	2019/11/30	2019/12/12

Sampling recommendation for next audit

Sampling rate	As per HQAI sampling requirements depending on number of projects at the time
Specific recommendation for selection of sites	Bhola

8. Acknowledgement of the report by the organisation

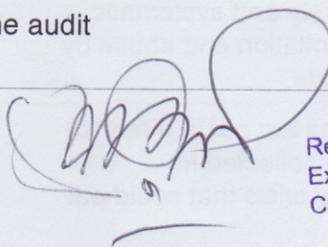| Space reserved for the organisation		
Reservations regarding the findings / remarks regarding the behaviour of the audit team: Reasons, please give details:	☐ yes	☑ no

Acknowledgement and Acceptance of Findings:

I acknowledge and understand the findings of the audit
I accept the findings of the audit

Name and signature of COAST representative: Rezaul Karim Chowdhury. Date: 05.01.2020.		Rezaul Karim Chowdhury Executive Director COAST Trust

Appeal

In case of disagreement with the decision on certification, the organisation can appeal to HQAI within 14 days after being informed of the decision. HQAI will investigate the content of the appeal and propose a solution within 10 days after receiving the appeal.

If the solution is deemed not to be satisfactory, the organisation can inform HQAI in writing within 30 days after being informed of the proposed solution, of their intention to maintain the appeal.

HQAI will transmit the case to the Chair of the Advisory and Complaint Board who will constitute a panel made of at least two experts who have no conflict of interest in the case in question. These will strive to come to a decision within 30 days.

The details of the Appeals Procedure can be found in document PRO049 – Appeal Procedure.

9. Annex 1: Explanation of the scoring scale

0	**Major non-conformity or Major weakness**
	Your organisation currently does not work towards applying this requirement, either formally or informally. It's a major weakness that prevents your organisation from meeting the overall commitment.
1	**Minor non-conformity or Minor weakness**
	Your organisation has made some efforts towards applying this requirement, but these efforts have not been systematic.
2	**Observation**
	Your organisation is making systematic efforts towards applying this requirement, but certain key points are still not addressed.
3	**Conformity**
	Your organisation conforms to this requirement, and organisational systems ensure that it is met throughout the organisation and over time – the requirement is fulfilled
4	**Exceptional conformity**
	Your organisation's work goes beyond the intent of this requirement and demonstrates innovation. It is applied in an exemplary way across the organisation and organisational systems ensure high quality is maintained across the organisation and over time.