



ZOA

CHS Certification Initial Audit Report

ZOA-IA-2019

Date: 2019-08-08

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1. General information

Organisation	ZOA		
Type	<input type="checkbox"/> National <input checked="" type="checkbox"/> International <input type="checkbox"/> Membership/Network <input type="checkbox"/> Federated <input checked="" type="checkbox"/> Direct assistance <input checked="" type="checkbox"/> Through partners		
Mandate	<input checked="" type="checkbox"/> Humanitarian <input checked="" type="checkbox"/> Development <input type="checkbox"/> Advocacy		
Verified Mandate(s)	<input checked="" type="checkbox"/> Humanitarian <input checked="" type="checkbox"/> Development <input type="checkbox"/> Advocacy		
Size	<ul style="list-style-type: none"> 14 country programmes with relief and recovery responses at date of application. 80 staff at HO in Apeldoorn 	Sampling Rate	<ol style="list-style-type: none"> Ethiopia (field visit) Myanmar (remote interviews) Burundi (document review only) Syria Response (document review only)
Lead auditor	Stephen Morrow	Auditor	Nik Rilkoﬀ
		Others	Nil
	Head Office (HO)	Programme Site(s)	
Location	Apeldoorn, The Netherlands	Addis Ababa & Shire, Ethiopia	
Dates	16 & 17 April 2019	19 – 24 April 2019	

2. Schedule summary

2.1 Verification Schedule

Name of Programme sites/members/partners verified	Location	Mandate (Humanitarian, Development, Advocacy)	Number of programmes/projects visited	Type of projects
Ethiopia				
North West Tigray (Shire Area)	Shire town	Humanitarian	1	Livelihoods
North West Tigray (Shire Area)	Hitsats Refugee Camp	Humanitarian	1	Livelihoods Energy

				Sustainable basic services
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2.2 Opening and closing meetings

2.2.1 At Head Office:

	Opening meeting	Closing meeting
Date	16 April 2019	8 May 2019
Location	ZOA Head Office (HO), Apeldoorn, Netherlands	Via Skype with ZOA HO
Number of participants	15 (7 women & 8 men)	10 (4 women & 6 men)
Any substantive issue arising	No	If ZOA might provide further documentary evidence relevant to preliminary findings outlined at the Closing Meeting. Clarified and resolved by subsequent email exchange between ZOA, Auditors, and HQAI.

2.2.2 At Programme Site(s):

	Introduction meeting	Wrap-up meeting
Date	19 April 2019	25 April 2019
Location	ZOA office, Addis Ababa, Ethiopia	ZOA office, Addis Ababa,
Number of participants	1 woman & 6 men	1 woman & 6 men
Any substantive issue arising	No	No

3. Recommendation

The lead auditor reviewed the actions taken and the evidence submitted by ZOA to address the pre-conditions identified in the Initial Audit, dated 8 August 2019. This occurred before the 07 February 2020 and thus within the specified timeframe of 6 months. The conclusion of the auditor is that the pre-conditions have been addressed and closed. Certification is recommended.

Detailed findings are laid out in the rest of this report and on its addendum (page 25) regarding the actions taken to close the pre-conditions.

Lead Auditor's Name and Signature

Stephen Morrow



Date and Place:

2020-02-25, Australia

4. Quality Control

First Draft	2019-06-06 – E. Goucem
Second Draft	2019-06-28 – E. Goucem
Final Draft – Pre-conditions	2019-07-08 – P. Hauselmann
Final Draft	2020-02-03 – P. Hauselmann

5. Background information on the organisation

5.1 General

ZOA was founded by three Dutch students in 1973, in response to a humanitarian crisis in South-East Asia. It has grown since then to employ over 900 people worldwide.

Its head office is in Apeldoorn, the Netherlands and it implements programmes in 15 countries. ZOA's geographic focus is areas categorised as fragile, often in conflict. Its vision is a world where people have hope and live dignified lives in peaceful communities; its purpose is to provide relief, hope and recovery to people impacted by conflicts and disasters. ZOA links its values to its staff and the organisation when it states: 'we value people; we are faithful; we are good stewards; we serve with integrity'.

ZOA affirms a dual mandate of being a relief and recovery organisation, with greater emphasis given to the relief element. It works in shelter, education, livelihoods and food security, WASH, and peacebuilding (including land rights). ZOA addresses cross cutting themes of gender, conflict sensitivity, and protection, by seeking to include these in all of its programme and project activities.

ZOA's income in 2018 was Euro 58,935,461.

5.2 Organisational structure and management system

ZOA has a relatively flat organisational structure.

A Supervisory Board governs the organisation and delegates authority to an Executive Board comprised of the Chief Executive Officer (CEO) and the Chief Programme Officer (CPO). These form the Direct Management Team (DMT), together with the heads of the support functions at Head Office such as finance, human resources (HR), programmes, and funding and communications.

The CEO and the CPO directly line manage the 15 Country Directors (CDs) which together form the International Management Team (IMT). The IMT meets formally twice a year.

ZOA has a decentralised operating model. CDs report directly to the CEO or the CPO, have delegated authority and responsibility for country programmes (CPs) and call on the HO support functions as required.

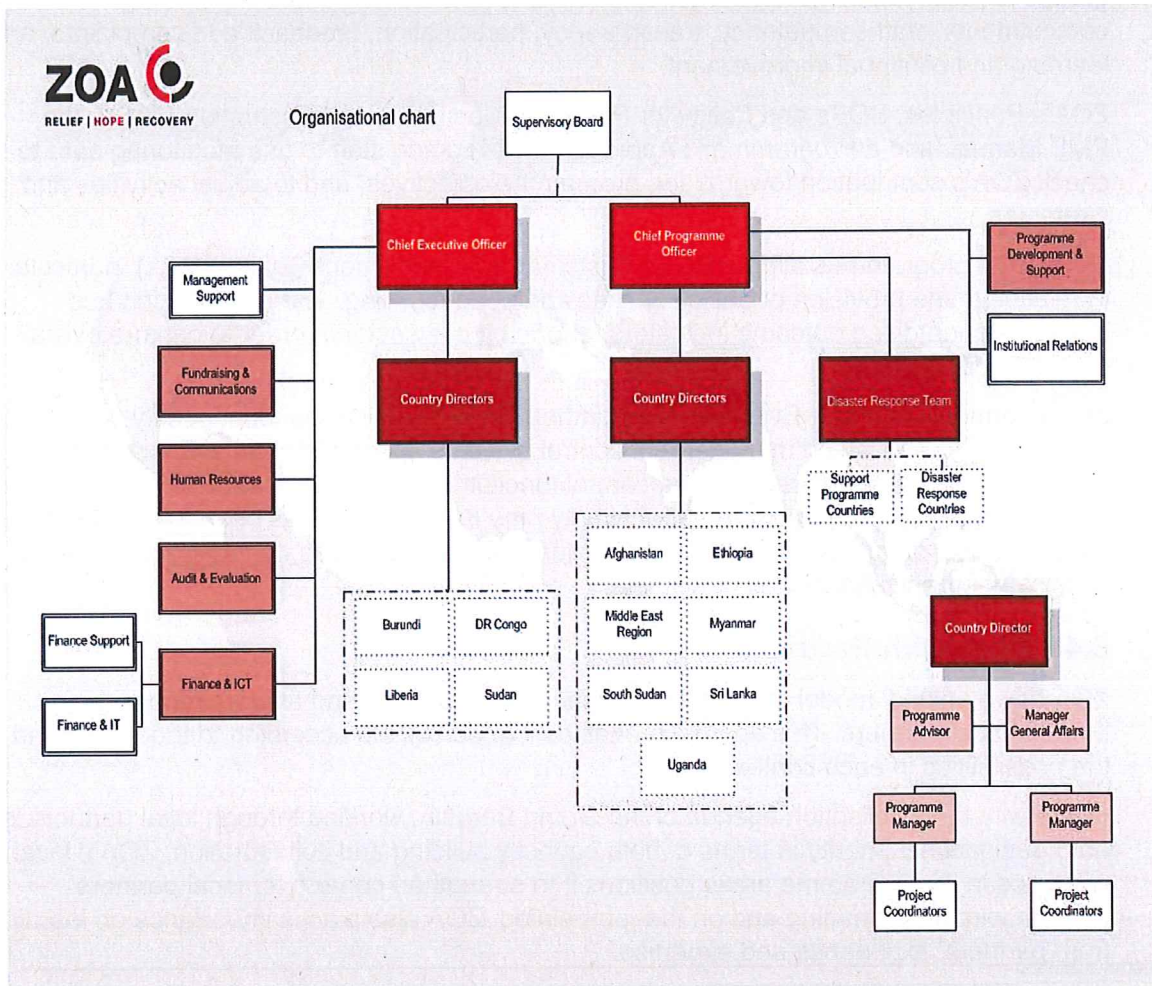
The Strategic Plan 2019-2022 sets medium to longer-term priorities which are then operationalised in Annual Business Plans for the whole organisation. These work in concert with Country Strategy and Annual Plans (CSAPs) developed each year by CDs and country teams.

ZOA HO focusses on five key roles:

- providing overall direction and setting the ZOA strategy;
- developing and rolling out standards and good practices;
- ensuring compliance with agreed practices and policies;
- raising private and institutional funding; and
- providing professional input and expertise.

In this decentralised operating model, there has been latitude for a range of practices and ways of working across the global portfolio. The Strategic Plan 2019-2022 indicates that ZOA is seeking to establish a more standardised 'ZOA way of working', backed up by a Quality Management System (QMS). This includes a recently introduced on-line software system, ZOA Manager, which is now operating in ten of 15 countries.

An organisational chart is displayed on the next page.



5.3 Organisational quality assurance

ZOA's quality assurance is structured around a recently-introduced quality management system that defines and reinforces the ZOA 'way of working'. A Quality Manual guides

alignment of all processes and procedures. To better serve internal and external stakeholders ZOA is implementing a three-stage quality management process of setting standards and guidelines; regular checking and audit; and correcting and following up findings and recommendations. This is put in place through an ongoing process of updates, pilots and roll-outs

This approach requires that all CPs are consistently using new technologies that enable transparency, collaboration and internal accountability. This includes the online digital project management system, ZOA Manager, which guides staff at each step with project cycle management (PCM) processes and templates.

A Quality Library database simplifies and updates existing resources including policies, procedures, and guidelines to enable users to understand the wider quality management framework.

Overall accountability within ZOA is defined in a Management Charter (2017) and an Accountability Framework (2013) that outlines commitments towards key stakeholder groups for accountability measures. This includes establishing and delivering on commitments, staff competency, transparency, participation, feedback and complaints, and learning and continual improvement.

ZOA's Principles, SOPs and Policy for Planning, Monitoring and Evaluation (2014), the PME Manual, and a Programmatic Approach (2011) guide staff to use monitoring data to check ZOA's contribution towards the programme objectives, and to adjust activities and strategies.

Many ZOA programmes align with the Sustainable Development Goals (SDGs), particularly in relation to the provision of basic services and peacebuilding. The organisation has defined standardised outcome indicators for each focus sector in order to capture overall organisational impact.

ZOA's former Auditing & Evaluation Department conducted independent quality assessments of CPs and management control systems against internal and external standards and norms. This audit and control function is being restructured in 2019 to focus on learning and improvement. A set of twenty-nine Key Controls has been introduced to form the basis of quality management of organisational processes, to consolidate a more consistent organisational way of working.

5.4 Work with Partners

ZOA has a 'hybrid' model of operation, implementing directly and also working with and through local partners. This approach enables it to be flexible according to the needs and the possibilities in each context.

In line with the localisation agenda of the Grand Bargain, working through local partners is an organisational priority in terms of both capacity building and collaboration. ZOA's local presence in its programme areas positions it to strengthen capacity of local partners through joint programming and on-the-job training. ZOA also places importance on learning from partners' experience and expertise.

ZOA's Accountability Framework (2013) commits it to upholding internal and external standards towards partners and expects a reciprocal commitment from partners. ZOA commits to assist partners to comply with internal (ZOA's Code of Conduct) and external (Sphere, HAP and People in Aid) quality standards.

ZOA distinguishes two types of partnerships:

- Implementing partnerships are short term and project-based, where ZOA funds a partner for project implementation. A funding agreement is signed by both parties;
- Strategic partnerships are longer-term, programme-based and may include (mutual) capacity strengthening, defined in Strategic Partnership Agreements.

Partners are selected based on a risk assessment and general basic criteria including governance and controls, financial management and fraud prevention, ethics and the ability to deliver and monitor programmes. Feedback and references from the population, peer NGOs, local government, and donors are also considered. Guidelines in the ZOA Policy for Partnering with Local NGOs (2018) guide the process from assessment and contracting through to evaluation and ending the partnership.

ZOA is also actively involved in Christian networks as platforms for lobbying and advocacy on humanitarian and development issues, as well as for potential collaboration with like-minded partners in future programmes.

5.5 Certification or verification history

ZOA is a Full Member of the CHS Alliance and was previously a member of the former Humanitarian Accountability Partnership (HAP) and People in Aid.

A Dutch CBF certificate, dated 1 July 2016, confirms that ZOA is a charitable organisation, and a Kiwa certificate number KSC-K41197/05, dated 7 July 2017 and valid until 1 July 2020, confirms that ZOA is compliant with ISO 9001.

6. Sampling

6.1 Rationale for sampling

ZOA populated the HQAI tool for sampling, and the Audit Team used this to randomly select four country programmes:

- Myanmar;
- the Syria Response;
- Ethiopia; and
- Burundi.

These had Context Security Risk ratings of 1 for Myanmar; 4,1, and 3 for the three countries in the Syria Response; 4 for Ethiopia; and 5 for Burundi.

Subsequent discussions with ZOA indicated that local authorities were restricting access to community members in Myanmar so a representative sample of consultations with community groups, and a field visit, was not feasible.

The Syria Response operation was in flux as it sought registration in country, so a field visit was not feasible.

Burundi's security rating and situation at the moment of sampling indicated a visit was not feasible.

Ethiopia had three separate programmes sites (PS), two of which were rated as volatile with regard to security, and one of which was more stable.

The Audit Team conducted a field visit to a PS in Ethiopia, remote interviews with ZOA staff and a partner organisation in Myanmar and reviewed documents from the Syria Response and the Burundi programmes.

The ZOA Ethiopia programme implements activities directly rather than working through partners as occurs in many other countries, and this will have to be addressed in subsequent audits. (see 6.2 below)

Disclaimer:

It is important to note that the audit findings are based on the results of a sample of the organisation's documentation and systems as well as interviews and focus groups with a sample of staff, partners, communities and other relevant stakeholders. Findings are analysed to determine the organisation's systematic approach and application of all aspects of the CHS across its organisation and to its different contexts and ways of working.

6.2 Recommended sample size for next audit

The sampling rate recommended for the next audit is as per the HQAI sampling table, and should be based on the number of CPs in operation at the time. With approximately 14% of ZOA's programmes implemented through partners at the time of this audit, and with this focus expected to grow according to the Strategic Plan 2019-2022, it is recommended that CPs implemented through partners are included in purposive sampling at the MTA. It is also recommended that field visits include a significant amount of ZOA's work through partners.

6.3 Recommended Organisational Responsibilities to check for the maintenance audit

As well as the CARs, it is recommended that Organisational Responsibilities of Commitments 3, 4, and 8 are checked at the Maintenance Audit.

6.4 Interviews:

6.4.1 Semi-structured interviews (individual interviews or with a small group <6

Position of interviewees	Number of interviewees
ZOA staff, Head Office, Apeldoorn, the Netherlands	19
ZOA staff, Programme site(s), Addis Ababa, Shire, & Hitsats Refugee Camp	23
Other: partner organisation and stakeholder organisation staff, Shire & Hitsats Refugee Camp e.g. other INGO, ARRA, UNHCR, TVET college, etc.	12
Total number of interviews	44 i.e. 44 interviews with 54 interviewees

6.4.2 Focus Group Discussions (interviews with a group >6

Type of Group	Number of participants	
	Female	Male
a) Men in livelihoods project		11
b) Women in livelihoods project including a PWD	8	
c) Refugees in Hitsats Refugee Camp		8
d) Refugees in Hitsats Refugee Camp including a PWD	8	
e) Refugee Central Committee (in two separate groups)		9
f) Discussions with individuals, or two people working together, participating in livelihoods project	7	2
Total number of participants	23	30

7. Report

7.1 Overall organisational performance

ZOA has made a formal commitment to implement the Core Humanitarian Standard (CHS) and to integrate the nine Commitments into its work. The Strategic Plan 2019-2022, Every Life Matters, finalised in early 2019 confirms that ZOA has ratified the Grand Bargain and is a signatory to the CHS. Much of ZOA's work is aligned with the CHS Commitments however, as also noted in the Strategic Plan, improvements are needed with regard to involvement of beneficiaries in the project design, implementation and evaluation, including feedback mechanisms.

One of ZOA's strengths is a decentralised operating model that delegates authority and responsibility for CPs to the CD and in-country management teams, thus locating decision-making close to project implementation. At the same time, this has allowed wide scope for a range of practices and ZOA global policies and guidelines are not consistently applied across CPs. ZOA is in the process of organisational change as it develops a more standardised 'ZOA way of working', supported by a Quality Management System (QMS) and an IT platform.

ZOA's review of its work with partner organisations in 2017 indicates that implementing partners have not sufficiently accommodated CHS requirements into their systems and procedures.

A significant area of weakness identified in this audit, also referenced in the Strategic Plan, is that ZOA does not yet consistently document nor systematically have in place at country level a complaints-handling process for communities and people affected by crisis that covers sexual exploitation and abuse of people or other abuses of power. This report also identifies important weaknesses under Indicators 3.6, 4.1, 5.1, 5.2, 5.3, 5.5 and 5.6, which together indicate a major systemic non-conformity on Commitment 5. ZOA cannot ensure that communities and people affected by crisis consistently have access to safe and responsive mechanisms to handle complaints - See addendum from the 22nd of February 2020, page 25, for information about corrective actions taken.

7.2 Summary of Corrective Action Requests

Corrective Action Requests	Type	Time for resolution
2019 – 3.4 Exit strategies are not systematically planned or communicated to stakeholders and communities.	Minor CAR	2021/08/07 (24 months)
2019 – 3.6 Programmes do not systematically identify and act upon potential or actual unintended negative effects in a timely and systematic manner in the areas of people's safety, security, dignity and rights, and sexual exploitation and abuse by staff.	Minor CAR	2021/08/07 (24 months)

2019 – 3.7 Policies, strategies and guidance are not designed to prevent programmes having negative effects such as exploitation, abuse or discrimination by staff against communities and people affected by crisis.	Minor CAR	2020/08/07 (12 months)
2019 – 4.1 ZOA does not systematically implement the Kick Off message template, or equivalent process, to provide consistent information to communities about expected staff behaviour, about feedback and complaints processes, and about project budgets.	Minor CAR	2021/08/07 (24 months)
2019 - 5.1 ZOA does not systematically consult with communities and people affected by crisis on the design, implementation and the monitoring of complaints-handling processes.	Minor CAR	2021/08/07 (24 months)
2019 – 5.3 ZOA does not systematically manage complaints in a timely, fair and appropriate manner that prioritises the safety of the complainant and those affected at all stages.	Minor CAR	2021/08/07 (24 months)
M2019 – 5.4 A complaints handling process covering sexual exploitation and abuse of people, or other abuses of power is not documented and in place for communities affected by crisis.	Pre-condition	2020/02/07 (6 months)
2019 – 5.5 An organisational culture in which complaints are acted upon according to defined policies and processes has not been established.	Minor CAR	2021/08/07 (24 months)
2019 – 5.6 Communities and people affected by crisis are not fully aware of the expected behaviour of staff, including ZOA's commitments on the prevention of sexual exploitation and abuse.	Minor CAR	2021/08/07 (24 months)
TOTAL Number of Major CARs		1
TOTAL Number of Minor CARs		8

7.3 Strong points and areas for improvement:

Commitment 1: Humanitarian assistance is appropriate and relevant

Score: 2.8

ZOA commits to providing impartial assistance in a range of key documents including the Strategic Plan 2019-2022, which also charges the organisation to develop needs-based responses. These commitments are operationalised through tools such as the Guideline Context Analysis, 2011; the Country Strategy and Annual Plan (CSAP) template; the Accountability Framework, 2013; and each of the 2016 sectoral policies on Water, Sanitation and Hygiene (WASH), Education, and Food Security and Livelihoods. The Strategic Plan focuses ZOA's support on the most vulnerable including women, children, female-headed households, elderly and disabled people, minorities, refugees, and internally displaced people (IDP) and the Accountability Framework, 2013, commits the organisation to involve target groups in all stages of the programmes. These and other guidelines steer ZOA to collect disaggregated data by age, gender and other categories.

The Strategic Plan also affirms ZOA's commitment to adapt programmes to changing needs, capacities and context when it identifies priorities including 'putting people at the centre'; and 'innovation', which requires ZOA to assess if interventions are leading to desired outcomes. Tools such as the annual context review, project reviews, and the recently introduced ZOA Manager information technology (IT) platform support CP staff to review lessons arising across programmes, and to propose changes that can be articulated in Project Implementation Plans (PIPs) as they are updated. However, this audit observed variable practice between CPs in terms of adapting projects and programmes to changing needs, capacities and contexts.

Feedback from people affected by crisis and communities on Commitment 1

Community members in a PS noted that they felt comfortable engaging with ZOA staff, that ZOA worked with their representatives and local government authorities to talk to people about interests, skills and capacities, their needs, and then to develop project activities. They also noted that many business groups in a livelihoods project had failed, that some group members had used their funds for living costs, and that most wanted to work as individuals rather than in groups. Community members and other stakeholders recommended that ZOA seek to work with individual rather than group grants but had been unable to effect changes in the project to date.

Commitment 2: Humanitarian response is effective and timely

Score: 2.6

ZOA makes decisions about humanitarian responses in countries where it has a presence within its regular planning system and processes as reflected in each CSAP and area plan; the overarching Strategic Plan; the Business Plan 2019; and the Management Charter, 2017. As well as these standing positions and processes, the Disaster Response Team (DRT) at HO manages a watching brief and develops options papers for ZOA responses, as outlined in a standardised Flowchart Decision Tree. The flowchart is not timed but outlines decision processes for emergencies that occur in a range of circumstances. These include factors such as where ZOA works with or without local partners; funding availability; and local registration requirements.

However, HO and CP staff noted that organisational capacities and performance vary between CPs. The decentralised operating model means that some policies and procedures are not consistently applied across CPs, and sometimes across area programmes within a CP.

To consolidate a more consistent 'ZOA way of working' and a more consistent set of capabilities across CPs, ZOA introduced a set of Key Controls in the second half of 2018, to establish reference points for mutual accountability between CPs and HO about agreed ways of working. It is being rolled out in 2019, beginning with self-assessments at country level and ongoing dialogue between CPs and HO, as they work to achieve the objectives outlined in the Strategic Plan 2019-2022.

Feedback from people affected by crisis and communities on Commitment 2:

Community members in Ethiopia noted that they liaised with their representative organisations, with ZOA, and other stakeholders to discuss risks and benefits of various options, and to develop plans for relief activities. They also noted that ZOA followed up with planned actions quickly.

Commitment 3: Humanitarian response strengthens local capacities and avoids negative effects

Score: 1.9

ZOA connects community structures to local government services and structures to promote sustainability, and it works with local partners to strengthen capacity as part of a commitment to localisation. ZOA programmes address social inequality in order to contribute to improved livelihoods, and livelihood projects are designed to benefit the local economy. The environment is considered in programme design but the environmental impact of ZOA's operations relies on individual levels of interest rather than a more systematic approach. ZOA mainstreams DRR: risk assessments are done for all projects, and context analysis guidance prompts staff to consider resilience and adaptation, although existing preparedness plans are not mentioned in guidance policies, procedures, or templates, nor in proposals sampled in this audit.

ZOA's Programmatic Approach, 2011, requires exit strategies and staff link sustainability to local leadership and government structures. The 2018 CSAP template includes exit strategies but they are not systematically planned. Not all proposals sampled have exit strategies, and if they do, they are communicated inconsistently to partners and communities.

ZOA mainstreams protection. All staff, contractors, volunteers, interns and partners are required to sign the ZOA Child Protection Policy, 2013, but there is no systematic orientation on it, and the policy is not always translated into local languages. The ZOA Code of Conduct (CoC), 2018, outlines behavioural expectations and includes mandatory reporting of breaches, but PSEA and abuses of power are not systematically included in community communications (see commitment 4). ZOA provides guidance to CPs on privacy, including the need for consent for using images and information. ZOA staff understand the need to safeguard privacy and information, although they do not consistently know about the ZOA Privacy Policy or HO guidance.

Feedback from people affected by crisis and communities on Commitment 3:

Community members indicated that alongside the importance of training and skills

development, including internationally recognised TVET qualifications, participation in livelihoods programmes was beneficial for their mental health. They also spoke of how ZOA includes everyone, including disabled people. Community members interviewed were not aware that the activities they were taking part in would end. Some community members felt the support had been inadequate or incomplete, leaving them worried for their futures. All communities interviewed declared appreciation for open communication with ZOA staff, nevertheless there was limited evidence of a systematic and consistent ZOA response to potential abuses of safety, security, dignity or rights. Communities reported no negative cultural, gender, social, or political impacts arising from ZOA's work.

Commitment 4: Humanitarian response is based on communication, participation and feedback

Score: 2.3

ZOA policies and guidelines prompt CP teams to develop local information sharing guidelines, and to share detailed information with communities about ZOA the organisation; about the planned project and any donors supporting it; the ZOA CoC; and a ZOA complaints form.

However, CPs sampled had not established local information sharing guidelines based on the overarching policy. ZOA advises communities about the organisation and about the project activities and deliverables in 'kick-off' meetings, but does not systematically include information about the budget, the project period, nor the CoC and expected staff behaviours, and ZOA's commitments around PSEA. CP staff noted that ZOA's programming tools do not explicitly address community engagement in detail, however their standard practices, and many donor proposal formats, steer CP staff to consult with communities, and to work with local committees and other structures so that consultation and feedback occurs through the project cycle.

ZOA's Child Protection Policy and a Social Media CoC charge staff to respect the people, partner organisations and donors that ZOA serves, and to uphold values of human dignity, faithfulness, stewardship and justice, including in images and stories. ZOA does not have a stand-alone communications policy and guidelines such as formal sign-off protocols to quality assure external communications for accuracy, and alignment with ZOA values, or other benchmarks.

Feedback from people affected by crisis and communities on Commitment 4:

Community members were aware that ZOA is a 'helping' organisation from Holland, that it is faith-based, and works with host communities and with refugees. They noted that staff behaved well, talked with communities several times a week, and followed-up on matters raised. Community members did not know project budgets, nor project periods, and were not aware of ZOA's expectations around staff behaviours.

Commitment 5: Complaints are welcomed and addressed

Score: 0

ZOA's Complaints Procedure for Beneficiaries, Partners and Other Stakeholders, 2013, serves as a guidance note for CPs to design a complaints procedure. It delegates responsibility for establishing country-level mechanisms to country management teams 'based on the cultural preferences of their communities'. The global procedure defines guiding principles that country-level mechanisms need to include in the locally contextualised procedure e.g. confidentiality, timescale, response, non-retaliation. CPs sampled had not documented local procedures, and communities sampled do not have access to the provisions described in the global procedure.

Consultation on the design, implementation and monitoring of complaints-handling processes is not done systematically in the sampled CPs. An exception is a multi-donor project in Myanmar that requires implementing partners to set up complaints and feedback procedures 'based on the preferences of communities.'

Programmatic complaints are taken seriously and acted on when received. But an organisational culture in which complaints are acted upon according to defined policies and processes has not been established. Some HO staff interviewed feel complaint mechanisms are led by donor processes and contracts at project level rather than by organisational policy. There is a lack of awareness, including at management level, of where responsibility for programmatic and sensitive complaints mechanisms rests.

Three CPs in the sample are informed by the global guidelines, but do not have a documented locally contextualised complaints process to follow consistently; and there is no evidence of consistent procedures for sensitive complaints. There was no evidence of a complaints mechanism in the fourth CP. In one CP with many recently hired staff there was no institutional knowledge of previous trainings and the HO guidance available. The information shared with communities about mechanisms does not consistently address the scope of issues people could complain about including diversion, corruption and sexual exploitation and abuse (SEA). Confidentiality and non-retaliation are not communicated to communities at any stage, with the exception of the Myanmar Prevention of Sexual Exploitation and Abuse Policy, 2018, (PSEA).

When combined, non-conformities identified under indicators 3.6, 4.1, 5.1, 5.2, 5.3, 5.4, 5.5 and 5.6 indicate a major systemic weakness on commitment 5. A safe and responsive mechanism to handle complaints is not in place. A major CAR is issued on this commitment.

Feedback from people affected by crisis and communities on Commitment 5:

Communities report good relationships with ZOA staff and feeling comfortable to talk to them, but few had been informed about a complaint mechanism or how to access it. No community members had awareness of the scope of issues a mechanism could address, nor the types of behaviour they could expect from ZOA staff, especially relating to the prevention of sexual exploitation and abuse.

Commitment 6: Humanitarian response is coordinated and complementary

Score: 2.8

ZOA is committed to working in collaboration with international and local partners in order to maximise the impact of responses and to avoid duplication of effort. Its Strategic Plan notes that good collaboration with local authorities, international institutions and other NGOs is key for successfully reaching the most vulnerable people.

ZOA HO participates in several international and national coordination mechanisms, and CP teams participate in coordination initiatives, as well as interagency coordination and sector-specific coordination groups, at national, province, and camp level. ZOA job descriptions, as well as programming tools and templates require CP teams to identify stakeholders in the country at various levels, and to clarify how ZOA will work with them.

ZOA's work with funded, contracted partner organisations is articulated consistently in standardised funding agreements. Its intent to forge strategic partnerships over the medium-term with partner organisations, generally based on principles that both partners share and aim to adhere to in the collaboration e.g. the ICRC Code of Conduct or the Sphere Standards, has not yet been achieved.

Feedback from people affected by crisis and communities on Commitment 6:

Community members reported that ZOA works with their representative body, the Refugee Central Committee (RCC), so that services to communities are complementary and coordinated, and local resources are shared sensibly.

Commitment 7: Humanitarian actors continuously learn and improve

Score: 2.7

ZOA CP teams plan programmes from lessons and prior experiences captured in monitoring, evaluation and quarterly reports and mid-term reviews. Guidance from ZOA HO on monitoring highlights that data analysis supports internal learning as well as the achievement of intended results. Staff follow up monitoring recommendations through action plan trackers, and cite examples of programmes changing based on monitoring information. The weakness of the complaint mechanisms in the CPs sampled potentially prevents learning on the basis of complaints.

ZOA is a member of international networks and has partnerships with knowledge institutes and universities, contributing expertise to networks and sectors and working in, and leading, consortia that commit to joint learning. ZOA participates in joint monitoring and shares lessons, monitoring reports and workplans in inter-agency and sector coordination meetings.

Research, implementation tools and training resources contribute to staff learning, along with regular events to facilitate exchanges within and between CPs. Recognising that a large pool of knowledge and experience was potentially not being utilised, ZOA has developed an online searchable database of documents, reports, research and tools (the Quality Library) which is being used in ten of 15 CPs, although universal uptake is inhibited by both variable confidence with computers and variable internet. The 'ZOA way of working', articulated through 29 country-level Key Controls, also supports learning, improvement and assurance that quality in ZOA CPs is based on a structured approach, and not on individuals. The Strategic Plan sets innovation as a focus and states that ZOA will proactively share learning and innovation.

Feedback from people affected by crisis and communities on Commitment 7:

Communities report being regularly included in review and learning discussions.

Commitment 8: Staff are supported to do their job effectively, and are treated fairly and equitably

Score: 2.6

ZOA staff highlighted the induction process, ongoing training, agreed job descriptions, and standardised performance management processes as central tools enabling them to work according to the values and mandate of the organisation. Staff were aware of the CoC and of other key policy guidelines, and consequences for not adhering to them. Most staff gained this understanding through reading and discussing the policies with their manager, but for some staff with limited English skills this awareness was gained only through discussions, after which they were required to formally sign acknowledgement forms.

ZOA's decentralised operating model has meant that HO guidelines can be and are implemented in a range of ways at country level. In this context, practices to support staff to improve their skills and competencies vary between CPs and between areas within the one CP. ZOA is currently consolidating a more consistent 'ZOA way of working', particularly through the use of a set of Key Controls and then ongoing dialogue between HO and CP about performance around these controls.

Feedback from people affected by crisis and communities on Commitment 8:

Community members spoke positively about ZOA staff, and appreciated the skills and capacities they brought to the work.

Commitment 9: Resources are managed and used responsibly for their intended purpose

Score: 2.5

Resource management follows ZOA guidelines, and logistics and procurement processes balance quality, cost and timeliness. Logistics and finance teams work closely with programme staff to focus on efficiency, quality, and fair prices in local or national markets. Finance policies and procedures are defined in the ZOA Accounting Manual, 2016, and associated templates. CPs check expenditure against budgets monthly, and file quarterly reconciliations and cashflow planning as the basis for monthly funds transfers from HO that correspond to expenditure.

A Management Charter, 2017, outlines processes to balance risks, segregate duties, and prevent fraud. ZOA's Anti-Fraud and Corruption Policy and Procedures, 2015, guides fraud and corruption prevention and detection. Finance and management staff in CPs monitor the risk through oversight and checking processes and procedures. The 2018 CoC roll-out requires three mandatory training sessions that include fraud and corruption. All staff interviewed were aware of ZOA's CoC, the zero-tolerance approach to fraud and corruption and the mandatory requirement to report any breaches, although not all staff interviewed were aware of the Anti-Fraud and Corruption Policy. Staff were consistently unable to describe how ZOA keeps whistle-blowers safe, linking this to confidentiality rather than non-retaliation.

ZOA HO staff review proposals for compliance (technical, accountability, financial and donor rules) and a new enterprise resource planning (ERP) system, being rolled out in 2020, also automates HR and procurement checks. Guidance for Safeguarding Assets,

2014, informs CPs on appropriate protection of all resources. Programme Managers at field level manage staff performance according to job descriptions.

ZOA's Strategic Plan seeks innovative environmental approaches to reduce the organisation's global carbon footprint, but there are no policies or procedures to operationalise this. Current efforts to reduce environmental impact of ZOA operations rely on individuals' interests. Several policies indicate the relevance and importance of environmental considerations and environmental factors are included in some needs assessments.

Feedback from people affected by crisis and communities on Commitment 9:

Community members, and community level stakeholders, were not familiar with project budgets but reported satisfaction with the way ZOA used funds properly and to help people in need.

8. Organisation's report approval

Acknowledgement and Acceptance of Findings

For Organisation representative – please cross where appropriate

I acknowledge and understand the findings of the audit

I accept the findings of the audit

I do not accept some/all of the findings of the audit

Please list the requirements of which you do not accept the findings

Name and Signature

Date and Place


C.T. Lukkien
CEO

Apeldoorn, 9/3/20



2019-06-28

9. HQAI's decision

Certification Decision	
Certificate:	
<input type="checkbox"/> Issued <input checked="" type="checkbox"/> Preconditioned	Start date of the certification cycle: 2019-08-08 Deadline plan to close identified pre-conditions: 2020-02-07
Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative	Date: 2019-08-08 

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 in writing HQAI 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.

Annex 1: Explanation of the scoring scale

0	<p>A score of 0 denotes a weakness that is so significant that it indicates that the organisation is unable to meet the required commitment. This is a major weakness to be corrected immediately.</p>
	<p>EXAMPLES:</p> <p>Operational activities and actions contradict the intent of a CHS commitment.</p> <p>Policies and procedures contradict the intent of the CHS commitment.</p> <p>Absence of processes or policies necessary to ensure compliance at the level of the commitment.</p> <p>Recurrent failure to implement the necessary actions at operational level make it impossible for the organisation to ensure compliance at the level of the commitment.</p> <p>Failure to implement corrective actions to resolve minor non-conformities in the adequate timeframes (for certification only)</p> <p>More than half of the indicators of one commitment receive a score of 1 (minor non-conformity), making it impossible for the organisation to ensure compliance at the level of the commitment. (for independent verification or certification only)</p>
1	<p>A score of 1 denotes a weakness that does not immediately compromise the integrity of the commitment but requires to be corrected to ensure the organisation can continuously deliver against the commitment.</p>
	<p>EXAMPLES:</p> <p>There are a significant number of cases where the design and management of programmes and activities do not reflect the CHS requirement.</p> <p>Actions at the operational level are not systematically implemented in accordance with relevant policies and procedures.</p> <p>Relevant policies exist but are incomplete or do not cover all areas of the requirement/commitment.</p> <p>Existing policies are not accompanied with sufficient guidance to support a systematic and robust implementation by staff. A significant number of relevant staff at Head Office and/or field levels are not familiar with the policies and procedures.</p> <p>Absence of mechanisms to monitor the systematic application of relevant policies and procedures at the level of the requirement/commitment.</p>
2	<p>A score of 2 denotes an issue that deserve attention but does not currently compromise the conformity with the requirement. This is worth an observation and, if not addressed may turn into a significant weakness (score 1).</p>
	<p>EXAMPLES:</p> <p>Implementation of the requirement varies from programme to programme and is driven by people rather than organisational culture.</p> <p>There are instances of actions at operational level where the design or management of programmes does not fully reflect relevant policies.</p> <p>Relevant policies exist but are incomplete or do not cover all areas of the requirement/commitment.</p>
3	<p>The organisation conforms with this requirement, and organisational systems ensure that it is met throughout the organisation and over time.</p>
	<p>EXAMPLES:</p> <p>Relevant policies and procedures exist and are accompanied with guidance to support implementation by staff.</p> <p>Staff are familiar with relevant policies. They can provide several examples of consistent application in different activities, projects and programmes.</p>

	<p>The organisation monitors the implementation of its policies and supports the staff in doing so at operational level.</p> <p>Policy and practice are aligned.</p>
4	<p>The organisation demonstrates innovation in the application of this requirement/commitment. It is applied in an exemplary way across the organisation and organisational systems ensure high quality is maintained across the organisation and over time.</p> <p>EXAMPLES:</p> <p>Field and programme staff act frequently in a way that goes beyond CHS requirement to which they are clearly committed.</p> <p>Relevant staff can explain in which way their activities are in line with the requirement and can provide several examples of implementation in different sites. They can relate the examples to improved quality of the projects and their deliveries.</p> <p>Communities and other external stakeholders are particularly satisfied with the work of the organisation in relation to the requirement.</p> <p>Policies and procedures go beyond the intent of the CHS requirement, are innovative and systematically implemented across the organisation.</p>

Addendum to the report – 2020-02-22

1. Introduction

ZOA has submitted a Corrective Action Plan dated 7 February 2020 to illustrate how it is addressing the eight Minor CARs (3.4; 3.6; 3.7; 4.1; 5.1; 5.3; 5.5; and 5.6) and the one Pre-condition (5.4) identified in the 28th June Report.

In the plan ZOA has outlined the actions it has already undertaken and provided documented evidence e.g. revision of the Code of Conduct; establishment of an Integrity Framework. It has also outlined planned actions and provided indicative evidence for these actions e.g. a training plan for the Integrity Framework in country programmes.

As per HQAI policy, the Lead Auditor has reviewed the corrective action plan and the documented evidence, to assess if the major non-conformity remains open, can be modified, or closed.

The analysis of the lead auditor and documented evidence submitted can be found in the file Corrective Action Plan ZOA 07022020 – Auditor Review 22 Feb 2020(confidential). A summary of the revised non-conformities is listed in section 2 below.

2. Conclusions

The lead Auditor concludes that ZOA has taken substantive steps across the Indicators in which minor CARS were identified and outlined a range of steps it will undertake in 2020. These, together with significant policy developments around the Code of Conduct, the complaints and feedback policies and processes i.e. the Integrity Framework that ZOA has developed, all at the global or organisational level, underpin the Auditor's recommendation that the Major non-conformity on 5.4 be converted to a Minor CAR – A complaints handling process covering programming, sexual exploitation and abuse, and other abuses of power, is not consistently documented and in place in all country programmes. The recommended time for resolution is 12 months. The Auditor recommends that this issue of country specific complaints and feedback processes be reviewed at the Maintenance Audit, and at the Mid-term Audit

The Auditor recommends that ZOA achieves certification; that progress against the Minor CARs at organisational responsibility level (3.7; 5.4; 5.5; and 5.6) be tested at the Maintenance Audit; and those at the Key Action level (3.4; 3.6; 4.1;5.1; and 5.3) be further tested at the Mid-term Audit.

3. Summary of Corrective Action Requests

Corrective Action Requests/ Weaknesses	Type	Time for resolution
2019 – 3.4 Exit strategies are not systematically planned or communicated to stakeholders and communities.	Minor	2021/08/07 (24 months)
2019 – 3.6 Programmes do not systematically identify and act upon potential or actual unintended negative effects in a timely and systematic manner in the areas of people's safety, security, dignity and rights, and sexual exploitation and abuse by staff.	Minor	2021/08/07 (24 months)
2019 – 3.7 Policies, strategies and guidance are not designed to prevent programmes having negative effects such as exploitation, abuse or discrimination by staff against communities and people affected by crisis.	Minor	2020/08/07 (12 months)
2019 – 4.1 ZOA does not systematically implement the Kick Off message template, or equivalent process, to provide consistent information to communities about expected staff behaviour, about feedback and complaints processes, and about project budgets.	Minor	2021/08/07 (24 months)
2019 - 5.1 ZOA does not systematically consult with communities and people affected by crisis on the design, implementation and the monitoring of complaints-handling processes.	Minor	2021/08/07 (24 months)
2019 – 5.3 ZOA does not systematically manage complaints in a timely, fair and appropriate manner that prioritises the safety of the complainant and those affected at all stages.	Minor	2021/08/07 (24 months)
2019 – 5.4 A complaints-handling process covering programming, sexual exploitation and abuse, and other abuses of power, is not consistently documented and in place in all country programmes.	Minor	2020/08/07 (12 months)

2019 – 5.5 An organisational culture in which complaints are acted upon according to defined policies and processes has not been established.	Minor	2021/08/07 (24 months)
2019 – 5.6 Communities and people affected by crisis are not fully aware of the expected behaviour of staff, including ZOA's commitments on the prevention of sexual exploitation and abuse.	Minor	2021/08/07 (24 months)
TOTAL Number of Minor CARS		9

4. Updated Average Scores per Commitment

CHS Commitment	Score
Commitment 1: Humanitarian assistance is appropriate and relevant	2.8
Commitment 2: Humanitarian response is effective and timely	2.6
Commitment 3: Humanitarian response strengthens local capacities and avoids negative effects	1.9
Commitment 4: Humanitarian response is based on communication, participation and feedback	2.3
Commitment 5: Complaints are welcomed and addressed	1.4
Commitment 6: Humanitarian response is coordinated and complementary	2.8
Commitment 7: Humanitarian actors continuously learn and improve	2.7
Commitment 8: Staff are supported to do their job effectively, and are treated fairly and equitably	2.6

Commitment 9: Resources are managed and used responsibly for their intended purpose 2.5

Organisation's addendum approval


Acknowledgement and Acceptance of Findings

For Organisation representative – please cross where appropriate

- I acknowledge and understand the findings of the audit
- I accept the findings of the audit
- I do not accept some/all of the findings of the audit

Please list the requirements whose findings you do not accept

Name and Signature

C.T. Lubkin
CEO 

Date and Place

Speldoon, 9/3/20

5. HQAI's decision

Certification Decision	
Certificate:	
<input checked="" type="checkbox"/> Issued <input type="checkbox"/> Preconditioned (Major CARs)	Start date of the certification cycle: 2019-08-08
Pre-conditions to certification	
None	
Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative	Date: 2020-02-28 