

Evangelical Fellowship of India Commission on Relief (EFICOR)

CHS Certification Initial Audit Report

EFICOR-CERT-2019-01

Date: 2019-04-15

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1. General information

Organisation	EFICOR			
Туре	☑ National☑ Membership/Netw☑ Direct assistance	ork 🗌	Internation Federated Through	d
Mandate		□ Deve	elopment	
Verified Mandate(s)		□ Deve	elopment	
Size (Total number of programme sites/ members/partners – Number of staff at HO level)	35 programme sites / 6 partners / 35 staff at HO level	Samplin (Country programi sampled)	me	4 project sites visited 2 projects documents reviewed
		Auditor		Nik Rilkoff
Lead auditor	ad auditor Catherine Blunt Others			None
			,	
	Head Office		Progra	mme Site(s)
Location	New Delhi		New D Kerala	elhi, Kalwa, Khandwa,
Dates	4-5 February 2019		6 – 8,	10 & 11 February 2019

2. Schedule summary

2.1 Verification Schedule

Name of Programme sites/members/partn ers verified	Location	Mandate (Humanitarian, Development, Advocacy)	Number of projects visited	Type of projects
Society for the Promotion of Tribal Welfare and Development – SPTWD (partner)	New Delhi	Development/ advocacy	1	Livelihoods, education, children at risk
Samarth Nutrition Project (direct implementation)	Kalwa	Development	1	Nutrition

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Karuna Bal Vikas Project (direct implementation)	Khandwa	Development	1	Maternal and Child Health
Flood relief (direct implementation)	Kerala	Humanitarian	1	Relief - Food and NFI distribution
Mankipur Integrated Climate Adaptation Project (direct implementation)	Chitrakoot District	Development	Document review	Food Security, Livelihood and Drought response
Bhil Tribal Development Project (direct implementation)	Pratapgarh	Development and advocacy	Document review	Livelihoods, Education



2.2 Opening and closing meetings

2.2.1 At Head Office:

	Opening meeting	Closing meeting
Date	4/2/19	12/2/19
Location	New Delhi	New Delhi
Number of participants	12	9
Any substantive issue arising	No	Commitment 5, Protection issues across the Commitments identified as possible Major CARs.

2.2.2 At Programme Site(s):

	Opening meeting	Closing meeting
Date	6/2/19	None
Location	New Seemapuri, New Delhi	None (time constraints)
Number of participants	5	
Date	7/2/19	None
Location	Khalwa	None (Not relevant - direct implementation)
Date	11/2/19	None
Location	Kerala	
Number of participants	11	None (Not relevant - direct implementation)



3. Recommendation

In our opinion, EFICOR does not conform with the requirements of the Core Humanitarian Standard. We do not recommend certification.

Detailed findings are laid out in the rest of this report.

Lead Auditor's Name and Signature

Cath Blunt.

Catherine Blunt

Date and Place:

4th March 2019

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4. Quality Control

Quality Control by	Claire Goudsmit			
Follow up				
First Draft	18/03/2019			
Final Drafts	25/03/2019 and 15.04.2019			

5. Background information on the organisation

5.1 General

The Evangelical Fellowship of India Commission on Relief (EFICOR) began as a unit of the Evangelical Fellowship of India (EFI) and has grown and changed throughout the years in response to humanitarian crises (1967 - Bihar famine; 1971 - East Pakistan refugee crisis; 1977 – Andhra Pradesh cyclone). A Training Unit was established in 1979 and EFICOR was established as a separate legal identity in 1980. EFICOR is a national Christian organisation engaged in relief, development, advocacy and capacity building. It serves the poor, the socially excluded and the marginalised irrespective of caste, creed or religion who are victims of poverty, injustice and disaster. It works with churches in India promoting and educating them about justice issues and to promote 'integral mission' (linking Christian faith and action). EFICOR's vision is 'working toward a just, responsible and compassionate society' and its mission is 'to influence and educate for good governance; facilitate communities toward transformation; and converge and collaborate for responsible social action'.

EFICOR's Strategic Plan (2015-2020) outlines the organisation's goals and the strategies to achieve them. All programmes are required to align with the strategic plan. Goals include: 1) establishing a centre for excellence in social transformation, achieved by educating and influencing through academics, training and publication and by helping shape policy through

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evidence-based research; 2) Enhancing the resilience and quality of life of the poor and vulnerable through implementing livelihood, disaster risk reduction (DRR), community health (emphasising maternal and child health and HIV), disaster recovery and improved living conditions for the urban poor and people with a disability; 3) engaging people in issues of justice and responsible living, through targeting key populations and peace building initiatives in conflict situations.

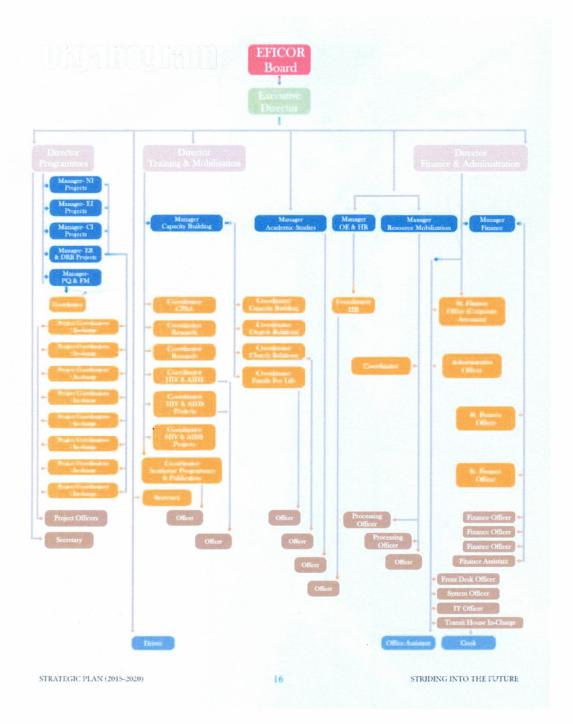
EFICOR works solely in India. The main geographical focus for development programmes are Bihar, Chhattisgarh, Delhi, Jharkhand, Madhya Pradesh, Orissa, Rajasthan, Uttarakhand, Uttar Pradesh and West Bengal. It is also focused on areas where HIV is prevalent such as Tamil Nadu, Andhra Pradesh and Maharashtra. Humanitarian projects can occur across the nation, working through the North East India Committee on Relief and Development (NEICORD) which is operative in Northern India.

The organisation has a budget of 3,125, 673USD this financial year and has 95 staff in total, 35 of whom work in the head office (HO). The majority of programmes are development/advocacy. Humanitarian relief is provided when needed.

5.2 Organisational structure and management system

The EFICOR Society is the registered custodian of the organisation and represents the Evangelicals in India. It is governed by a Board elected by the Society which sets the broad parameters and policies within which it wants its Executive Director (ED) and the staff members to maintain its values and work towards achieving its vision, mission and goals. The ED reports to the Board and has delegated authority by them to employ staff, operate programmes according to agreed budgets and expend funds according to agreed limits. The Board and ED are supported by a Governance Committee (organisational risk, policy development, ED appraisal) and a Finance Committee (audit, financial health, budget). Membership consists of Board members, the ED and/or relevant Director and reports to the wider Board which meets twice a year or more regularly if required. The ED is supported by three Directors who are responsible for Finance, Training and Mobilisation and Programmes. The Programmes Department is divided into different geographic/thematic zones and each is headed by a manager: South and Central India; North India; East India and Health projects; and Emergency response and DRR. Each manager is responsible for 6 or 7 projects, which are managed by coordinators who oversee project officers responsible for each programme. They in turn work with the Community Organisers (COs) who come from the area, speak the language, and are familiar with the dynamics of the community. The Director for Training and Mobilisation runs EFICOR's extensive training programme and assists with research, baseline assessments and oversees the HIV programme. Two additional managers are responsible for programmatic quality and organisational effectiveness (learning, standards, human resources).





5.3 Organisational quality assurance

The role of the Programmes Director is to ensure that organisational strategies are implemented, the vision and mission of the organisation is achieved, staff are mentored and quality and technical standards are followed. Managers have a direct line of sight to projects they are responsible for, visiting the field (and partners) every quarter, undertaking and verifying monitoring activities, engaging with stakeholders and supporting staff. The manager responsible for programmatic quality control checks programme proposals to ensure that goals, objectives and indicators are measurable, risk analysis and exit /sustainability strategies have been considered, and the latest trends and data have been incorporated. The Director of Training is sometimes involved in baseline assessments. EFICOR has a range of donors. Many are members of the MICAH network, a global network of Christian

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organisations, which has well developed and detailed proposal, monitoring and evaluation templates.

The Finance Director manages four internal financial audits a year conducted by an external auditor which focus on compliance with financial and legal requirements.

5.4 Work with Partners

EFICOR mainly implements its projects directly but works alongside local partners during emergencies and delivers some of its development projects (currently 18%) through partners. The organisation has criteria for selecting partners (small, faith-based organisation (FBO), like-minded, impartial provision of service, development approach, sectoral expertise) and due diligence is conducted (legal compliance, capacity, and whether systems, procedures and policies are in place). A capacity building programme is initiated at the start of the partnership, with the aim of developing the organisation in order that it can operate fully without EFICOR's support in the future. The Board Governance Committee approves partners on the recommendation of the Director of Programmes. Partners are required to abide by EFICOR policies or have their own in specified areas e.g. child safeguarding, although EFICOR does not check how the partner implements such policies. Managers visit partner projects on a quarterly basis, conducting the same type of monitoring as occurs in EFICOR's directly implemented projects. During a humanitarian crisis, its aim is to work alongside partners (local FBOs and community-based organisations (CBOs) utilising their local knowledge and training volunteers to assist in the provision of relief. Partners are not made aware of the CHS by EFICOR, nor are they supported to implement it or monitored on how it meets the CHS.

5.5 Certification or verification history

This is EFICOR's initial audit against the CHS. It has no prior history of certification against other schemes.

6. Sampling

6.1 Rationale for sampling

The HQAI random sampling formula and template was used as the initial basis from which projects were selected. Based on the total number of EFICOR projects (35) the auditors were required to audit 6 projects (2 site visits, 1 remote site and the document review of 3 project sites).

The auditors visited 4 projects and reviewed 2 project sites documents. Half of the sample size (3 projects) were sites based on the random sampling.

Additional project sites i.e. non-randomly selected, were selected because they:

- Covered the full mandate of the audit scope (humanitarian, development, advocacy) enabling communities to be interviewed and projects visited for each mandate;
- Enabled one partner organisation and project to be visited, which represents the proportion of projects implemented through partners (1/5);
- All other elements being equal, were reasonably accessible within the timeframes, had regional offices with staff available to interview or were located in the same area.

The project sites for document review were randomly selected from the remaining projects.

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

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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 the mid-term audit

The sampling rate recommended for the mid-term audit of EFICOR is as per the sampling table and should be based on the number of projects operative at the time. It is recommended that a partner organisation is included in the sample size.

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, 5 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
Head Office	14
Directors	4
Managers	7
Program co-ordinators/officers	4
Programme site(s)	15
Partner staff	6
Field staff	9
Total number of interviews	29

6.4.2 Focus Group Discussions (interviews with a group >6

Type of Group	Number of participants		
	Female	Male	
New Seemapuri Slum project	14	5	
Khandwa	23	20	
Khalwa	20	0	
Kerala	2	4	
Total number of participants	56	29	



7. Report

7.1 Overall organisational performance

EFICOR's strengths are in its model of development and humanitarian programmes which build on community capacity and enhance local leadership, contributing to resilience and sustainability of programme achievements. Their commitment to, and implementation of, programmes that target the most vulnerable reflects strong alignment between its strategic direction, organisational values, and a project management, monitoring and evaluation system which systematically identifies and captures achievement of goals, objectives and targeted groups. Programme design and implementation is based on objective data, issues identified by the community and prior learning. Human and financial resources are particularly well managed, with a clear line of sight and support operating from HO to the project sites. EFICOR has minor weaknesses in provision of information to communities about the organisation and how it expects staff to behave; the knowledge and application of polices particularly child protection and its Code of Conduct, which does not contain the requirements of organisation's staff not to abuse, exploit or discriminate against people. Despite EFICOR's many strengths, the organisation does not provide communities with a safe and responsive complaints handling system. The audit also identified connected weaknesses around the components of the CHS associated with complaints, safeguarding and the protection of communities. This has resulted in the issuance of major non-conformities on indicators 3.6 and 5.4 (see below).

7.2 Summary of Corrective Action Requests

Corrective Action Requests / Weaknesses	Type (Minor/Major)	Time for resolution
2019 - 3.6. EFICOR has no systematic process to identify and act upon potential or actual unintended effects in a timely and systematic manner in the area of sexual exploitation and abuse by staff of communities.	Major	2019-09-22
2019 - 3.7. EFICOR does not have policies, strategies or guidance that are designed to prevent programmes having any negative effects such as exploitation, abuse or discrimination by staff against communities.	Minor	2020-03-22
2019 – 4.1. Information is not provided to communities and people affected by crisis about EFICOR, the principles it adheres to and the expected behaviours of staff.	Minor	2021-03-22
2019 – 5.1. Communities and people affected by crisis have not been consulted on the design, implementation and monitoring of complaints-handling processes.	Minor	2021-03-22
2019 – 5.2. EFICOR does not communicate how complaints mechanisms can be accessed in development programmes and does not communicate the scope of issues the mechanism can address.	Minor	2021-03-22
2019 – 5.3. EFICOR does not systematically manage complaints in a timely, fair or appropriate manner or	Minor	2021-03-22

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prioritise the safety of the complainant and those affected at all stages.		
2019 – 5.4. EFICOR does not have a documented complaint handling process in place for communities and people affected by crisis that covers programming, sexual exploitation and abuse and other abuses of power.	Major	2019-09-22
2019 – 5.6. Communities and people affected by crisis are not aware of the expected behaviour of EFICOR staff including commitments on the prevention of sexual exploitation and abuse.	Minor	2021-03-22
2019-8.7 EFICOR does not have a code of conduct in place that establishes at a minimum the obligation of staff not to exploit, abuse or otherwise discriminate against people.	Minor	2020-03-22
2019-8.8 EFICOR does not have policies in place to support staff to improve their skills and competencies.	Minor	2020-03-22
	TOTAL Number	2 Major
	TOTAL Number	8 Minor

7.3 Strong points and areas for improvement:

Commitment 1: Humanitarian assistance is appropriate and relevant

Score: 3

EFICOR is continuously reviewing the context and stakeholders by using objective data from national and international sources and impartial measurements such as child birth weight, height, as well as input from field staff and community leaders to assess, design and implement programmes. EFICOR's focus is the poorest, most disadvantaged communities as well as those experiencing climate change and high HIV rates. Projects are based on community needs, vulnerabilities and capacities within existing village structures, and are adapted as these change over time. EFICOR policies commit to providing impartial assistance based on data disaggregation.

Feedback from people affected by crisis and communities on Commitment 1

Communities reported that projects met their needs and were available to all regardless of caste, religion or sex and that staff respected their culture. They felt safe to access assistance and project activities were adapted as their capacities increased e.g. knowledge of how communities can access disability and other entitlements has developed so assistance in this area of work is no longer needed.

Commitment 2: Humanitarian response is effective and timely

Score: 3

EFICOR programmes are designed according to the priorities identified in its Strategic Plan, which are based on EFICOR's areas of expertise and experience. EFICOR's decision-making is timely, based on strong adherence to funding application timeframes, delegated spending approvals and strong internal line management and monitoring processes which give a clear line of sight to project sites. A particular strength is EFICOR's work with communities to better access available government entitlements. The organisation uses relevant sectoral technical standards and good practice for its

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programme management, needs assessment, monitoring and evaluation tools. It has policies for monitoring and evaluation and uses evidence from these to adapt and improve its programmes and projects.

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

Communities appreciated the rapid response of EFICOR after the Kerala floods, the safe and orderly distribution of food and the priorities given to the elderly and disabled. They appreciated that EFICOR staff referred them to government agencies and they said that projects were well run.

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

Score: 0

A particular strength of EFICOR is that its programmes build on the capacities of local village structures, government health workers and various faith and community-based organisations to improve the resilience and build leadership within communities and people affected by crisis. It uses participatory risk analysis and existing risk assessments to contribute to activities and exit or sustainability strategies are included in the early stages of project planning. Livelihood strategies, development of first responder capacities in the DRR programme and procurement policies contribute to early disaster recovery and benefit the local economy. EFICOR has organisational policies, strategies and guidance to build local capacity.

EFICOR has no organisational systems to protect personal information collected from communities, nor does it risk assess programmes for child safeguarding. Staff understanding of reporting processes and responsibilities is not systematic throughout the organisation.

Despite having gender, child safeguarding, vulnerable adults and anti-sexual harassment in the workplace, policies (for staff), a major weakness is that EFICOR does not identify the risk of sexual exploitation and abuse by staff of communities nor does it have its own policies, strategies or guidance in this area. Combined with a lack of information to communities on the organisations' expectations of staff behaviour, inadequate complaint mechanisms and the lack of a staff code of conduct that includes the obligation of staff not to exploit, abuse or otherwise discriminate against people, this points towards a major systemic gap in EFICOR's capacity to ensure its programmes avoid negative effects, especially in the area of SEA by staff. Thus, a major non-conformity is raised resulting in a score of 0 at the level of the Commitment.

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

Communities reported on a variety of mechanisms in which they either participated as local leaders (e.g. receiving training, briefing on their representative role or introducing EFICOR to the community) or participated in meetings on different subjects e.g. hygiene strategies. Local village health workers and volunteers highly valued the support and training provided by EFICOR in development and relief programmes. Communities in Kerala and representative committees for development projects were informed of the intervention's timeframe. Communities reported the benefit of access to cash and education to start a business and for women to gain the confidence to get out of their homes and participate in village life.

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

Score: 2.3

EFICOR has a strong culture of open communication and sharing of information within the organisation. External promotional information is ethical, respectful and clear although this is not detailed as a requirement in the External Communications policy. Printed and web-based materials include both the organisation's religious affiliation and their commitment to providing impartial assistance on the basis of need. EFICOR provides easily understandable and culturally appropriate information to communities about project activities and entitlements, although it is a weakness that EFICOR does not provide information to communities about how it expects its staff to behave. Key implementation staff (Community Organisers) are recruited locally to facilitate language comprehension and cultural appropriateness. While staff indicate that they provide information about EFICOR and its principles to communities verbally, community members were unable to recall these details.

Proposal, monitoring, evaluation templates and manuals for staff, guide teams to engage communities and seek their input at all stages of the programme cycle. EFICOR's values and strategic plan signal that participation and inclusion are cross-cutting themes in all of their work, although the organisation does not have a policy or guidance in place for information sharing with communities. Staff are very welcoming of feedback and communities have many channels to provide this including FGDs, interviews, community meetings, although this is not systematically recorded. Feedback from diverse groups (based on gender, age and disability) is not systematically collected or reported.

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

Communities indicate that staff are respectful and well behaved and they feel comfortable giving feedback to the organisation. They are aware of their rights and entitlements in relation to EFICOR's projects and feel that project information is easily understood and culturally appropriate, and they especially appreciate the video format. Communities feel that access to assistance is equitable and safe and many participate in project implementation through community-level meetings of village development committees and community-based organisations.

Commitment 5: Complaints are welcomed and addressed

Score: 0

EFICOR is at the early stages of developing a culture of taking complaints seriously: staff uniformly indicate openness to complaints and the CEO gives out his own phone number in certain circumstances. In the 2018 Kerala relief project, a complaint box, email address and telephone number were established and registers were kept of complaints, appreciations, follow-up and referrals. However, the community was not consulted on the design, implementation or monitoring of this process and there was no recorded timeframe for resolution, established process for how complaints are resolved or an appeals process.

Development programmes form the majority of EFICOR's work with communities and it does not have a systematic complaints mechanism operative for these programmes. It has no guidance on dealing with programmatic complaints and has three separate policies relating to aspects of safeguarding, each with a different complaint process.



Policies on protecting children and people with disabilities are well-publicised to staff, but not communities and do not apply to people affected by crisis outside these groups e.g. men and women; those who are not disabled. The safety of complainants cannot be assured as these policies are not consistently applied across the organisation. EFICOR's Policy Against Sexual Harassment at the Workplace does not apply to communities. In addition, partners are not required (through partnership agreements) to have a complaint mechanism.

A major non-conformity is raised on this Commitment, as the majority of indicators require minor corrective actions, indicating communities do not have access to safe and responsive mechanisms for complaints. Without a documented process, there is no assurance of complaints being handled in a timely, fair and appropriate manner by EFICOR, or for prioritising complainant safety or confidentiality when a complaint is received under the other policies.

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

Communities in the 2018 Kerala relief programme were aware of how to make a complaint on the day of distribution. Communities also report that EFICOR and partner staff behaviour is "very good" but were not made aware of the expected behaviour of staff, including commitments on the prevention of sexual exploitation and abuse.

Commitment 6: Humanitarian response is coordinated and complementary

Score: 3

EFICOR's commitment to collaboration and coordination is systematically expressed through its core values, as a cross-cutting theme in the strategic plan and trainings, and in all levels of programming from operations manuals through to design, monitoring and reporting templates. In both emergency and relief programmes, EFICOR is consistent in attending interagency group meetings to ensure their services and support are coordinated with, and complement the work of, other NGOs and the government.

EFICOR's emergency responses facilitate FBOs and CBOs to provide relief in their local communities. First steps in a response include mapping known contacts and potential partners to enable role clarification. Stakeholder analyses are conducted as part of the response design process, where capacities of communities (including potential volunteers), CBOs and potential partner FBOs are mapped. MOUs between EFICOR and partners, and where applicable, government departments, are clear on the responsibilities of each party. EFICOR's development programmes are consistently aligned with and support the achievement of the SDGs as well as national development indicators in their programme sectors. Food security and livelihoods interventions are built on national climate science and DRR knowledge and EFICOR also plays an important role in local district-level climate resilience plans. EFICOR takes a leadership role in the NGO sector, for example through their executive membership in Sphere India, and they take part in and draw information from, joint needs assessments that minimise demands on communities.

EFICOR core values reflect a commitment to partnerships that is reflected in clear and respectful partnership agreements and productive working relationships with partners. Partners report satisfaction with the degree of collaboration and working toward shared goals, as well as the support and capacity development that EFICOR provides. The implications of EFICOR's commitment to the CHS are not clearly known to partners.

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

Communities do not experience duplication or a lack of coordination between EFICOR and other NGOs, either in relief or development projects. While there are gaps in development assistance due to high levels of need in poverty-affected communities,

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there is recognition and appreciation for EFICOR's support in connecting communities to government services and entitlements.

Commitment 7: Humanitarian actors continuously learn and improve

Score: 2.7

EFICOR has a particular strength in contributing to learning and innovation within the NGO sector and has taken leadership roles in national and international fora. In the past the organisation has contributed to national and international articles on its expertise in disaster risk reduction (DRR). EFICOR has assisted state governments within India to develop regional DRR plans. It uses learning from evaluations and monitoring processes to learn and innovate but does not use feedback from communities or complaints as these processes are poorly developed. It shares learning internally through meetings and with stakeholders but does not have a mechanism to record knowledge and experience within the organisation. It does not have evaluation and learning policies.

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

Communities reported that projects had changed over time e.g. from nutrition to a focus on livelihoods. Communities said that no learning was shared with them by EFICOR.

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

Score: 1.9

EFICOR has a strong evangelical Christian ethos, apparent in daily prayers, inclusion of a faith perspective in all policies and the requirement for Board and staff members to be Christians. Staff work to agreed objectives and performance standards, and despite the lack of a training policy, are provided with regular training opportunities. The organisation ensures that it has the management and staff capacity to deliver its programmes as it only implements projects once they are funded. Staff and volunteers have job descriptions, are oriented through induction/training processes and mentoring and there are regular appraisals. Staff have the opportunity to comment on policies, recruitment is transparent and the requirement to be a Christian is articulated. However, Community Organisers, who operate directly with the communities, are not offered the same employment conditions as other staff in the organisation. EFICOR has a well-understood safety and security policy but not on staff well-being. The organisation's policy commitment to annual refresher training in sensitive policy areas e.g. child safeguarding, dealing with vulnerable people, sexual harassment, has not occurred for the last three years. Operational staff have limited knowledge of the Protection and Prevention of SEA and of wider safeguarding issues related to their organisation.

The main weaknesses are that EFICOR's Code of Conduct does not include the minimum obligations of the staff not to exploit, abuse or discriminate against people, and that it does not have a training policy. These are amplified due to staff and partner lack of knowledge of policies applicable to them, particularly in relation to child safeguarding and the lack of policies on protection of communities from sexual exploitation and abuse by staff.

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

Communities reported that staff and volunteers were capable, did their jobs well and treated them respectfully by working beside them.

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

Score: 2.8

EFICOR designs its projects with input from the field and HO, balancing the requirements of adequate staffing, expenditure of finances, environmental impact and timeliness with quality and cost. Food and non-food-items are not stockpiled, purchasing occurs locally and close to the time items are required. All expense vouchers are checked by finance officers ensuring resources are used for their intended purpose and are not wasted. Expenditure is monitored and reported against the budget monthly at the field and quarterly at HO. Anti-fraud mechanisms are in place and fraud is addressed and recorded if identified. Policies and processes for the acceptance of gifts, environmentally responsible initiatives, fraud, conflicts of interest and misuse of resources, auditing and transparency initiatives and ensuring that acceptance of resources does not compromise independence are in place. It does not have guidelines for the ethical acceptance of resources or an anti-corruption policy.

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

Communities were not familiar with the project budgets but reported that resources were used wisely and well.

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

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

DILLY RENNEDY DHANABALAN

Name and Signature

18/4)19 New Delhi.
Date and Place

2019-04-15

9. HQAI's decision

Certification Decision	
Certificate:	
☐ Issued ☐ Preconditioned (Major CARs)	Start date of the certification cycle: Deadline plan to close identified CARs:
Pre-conditions to certification Major corrective action request: Corrections and corrective actions taken will need to be assessed within 6 months by HQAI senior auditor as per POL114 – Third party quality assurance policy.	
Pierre Hauselmann Executive Director HQAI	Date: 2019-04-15

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.