



ActionAid Group  
Initial CHS Group Verification  
Audit Report

AAGR-VER-2018-005

Date initial: 2018-10-01

Date Addendum: 2019-05-20

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## 1. General information

Group name	ActionAid Group		
Group management/entity	ActionAid Kenya		
Mandates	<input checked="" type="checkbox"/> Humanitarian <input checked="" type="checkbox"/> Advocacy <input checked="" type="checkbox"/> Development		
Verified Mandate(s)	<input checked="" type="checkbox"/> Humanitarian <input type="checkbox"/> Advocacy <input type="checkbox"/> Development		
Size	16	List of members	ActionAid UK ActionAid Denmark ActionAid Kenya ActionAid Bangladesh ActionAid Haiti ActionAid Australia ActionAid Ethiopia ActionAid Gambia ActionAid India ActionAid Ireland ActionAid Italy ActionAid Nigeria ActionAid Palestine ActionAid Somaliland ActionAid Sweden ActionAid Zimbabwe
Size of sample	5	Members sampled	ActionAid UK ActionAid Denmark ActionAid Kenya ActionAid Bangladesh ActionAid Haiti
Lead auditor	Johnny O'Regan	Auditor(s)	Belinda Lucas Andrew Nzimbi
		Elissa Goucem	Observer- UK
	Group members HO	Group members visited programme Site(s)	
Locations visited		UK, Kenya, Bangladesh, Haiti, Denmark	
Dates		2 <sup>nd</sup> April 2018 to June 26 <sup>th</sup> 2018	

## 2. Schedule summary

### 2.1 Verification Schedule

Member	Programme sites visited / location	Location	Mandate (Humanitarian, Development, Advocacy)	Number of projects visited	Type of projects
ActionAid UK	UK	London	Humanitarian	1	Humanitarian
ActionAid Denmark	Denmark	Copenhagen	Humanitarian	1	Humanitarian
ActionAid Kenya	Kenya	Malindi	Humanitarian	2	Food Security/ Education/WASH/ Protection/Accountability/Nutrition
ActionAid Bangladesh	Bangladesh	Dhaka/ Cox's Bazar	Humanitarian	1	Camp management/ accountability
ActionAid Haiti	Haiti	Port au Prince	Humanitarian	1	Food security, livelihoods, shelter and women's protection

## 2.2 Opening and closing meetings

	Opening meeting	Closing meeting
Date	4/3/18	6/18/18
Location	London	Remotely
Number of participants	13	4
Any substantive issue arising	No	Clarification was sought on whether the scoring for the commitments will be done for the group or individual members. It was clarified the scoring will be for the group.

	Opening meeting	Closing meeting
Date	5/7/18	6/7/18
Location	Nairobi	Remotely
Number of participants	6	3
Any substantive issue arising	No	No

	Opening meeting	Closing meeting
Date	5/21/18	5/25/18
Location	Port au Prince	Port au Prince
Number of participants	8	5
Any substantive issue arising	No	No

	Opening meeting	Closing meeting
Date	5/28/18	1/6/18
Location	Dhaka/ Cox's Bazar	Dhaka/ Cox's Bazar
Number of participants	10/ 12	3
Any substantive issue arising	No	No

	Opening meeting	Closing meeting
Date	6/21/18	6/22/18
Location	Copenhagen	Copenhagen
Number of participants	11	1

Any substantive issue arising	No	No
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### 3. Recommendation

#### Initial recommendation

In our opinion ActionAid Group does not conform to the requirements of the Group Scheme. Inclusion in the Group Scheme Verification is conditioned to the resolution of the major CARs related to the formal establishment of the Group.

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

*Seamus O'Regan*

Dublin, August 21, 2018

#### Subsequent recommendation

The lead auditor reviewed the actions taken to close the preconditions identified in the initial audit as well as the evidence submitted. The conclusion of the lead auditor is that ActionAid Group now conforms to the requirements of the Group Scheme. The audit team is satisfied that ActionAid Group meets group requirements as defined by POL500 – Groups policy

See Addendum (page 22) dated 2019-05-20 for the final recommendation.

*Seamus O'Regan*

Dublin, May 20, 2019

### 4. Quality Control

<b>Quality Control by</b>	Claire Goudsmit, Elissa Goucem, Pierre Hauselmann
<b>Follow up</b>	
First Draft	2018-08-21
Final Draft	2019-05-20

## 5. Background information on the Group

### 5.1 General

#### Glossary of terms

Entity name	Meaning in the report
ActionAid Federation ('the federation')	The federation of ActionAid members that are united by shared values, vision and mission
ActionAid International (AAI)	The central international structure of the federation that houses its Global Secretariat.
ActionAid Group	The nascent group entity of self-selected ActionAid members that is the object of this report
ActionAid Group members or Group members	The individual members of the ActionAid Group, which, in the absence of a functioning group entity, are the main focus of this report.

This report represents the findings of the initial verification audit of the ActionAid Group. It is comprised of 11 ActionAid affiliates (Australia, Bangladesh, Denmark, India, Ireland, Italy, Kenya, Nigeria, Palestine, Sweden, United Kingdom) and five ActionAid country programmes (Ethiopia, Gambia, Haiti, Somalia and Zimbabwe) that are managed by the Global Secretariat of ActionAid International (AAI).

The members of the ActionAid Group are also members of AAI, an association established in 2003 as the central international structure of the ActionAid federation. AAI currently comprises 45 affiliates, associates and country programmes united by a central structure and shared values, vision and mission. In 2017, a sub-set of AAI's members came together to form the ActionAid Group for the purpose of seeking quality assurance against the Core Humanitarian Standard. **This report does not address AAI as a whole, but the ActionAid Group.**

The vision and mission of AAI applies to the ActionAid Group. The vision is to have a just, equitable and sustainable world in which every person enjoys the right to a life of dignity, freedom from poverty and all forms of oppression. The mission is to achieve social justice, gender equality, and poverty eradication by working with people living in poverty and exclusion, their communities, people's organisations, activists, social movements and supporters.

ActionAid Group members work with communities, people's organisations, women's movements, groups and networks, social movements and other allies to overcome the structural causes and consequences of poverty and injustice. Thematic areas include: food rights, women's rights, governance, education, emergencies and conflict, climate change and HIV and AIDS. ActionAid Group members support the four priorities of AAI: addressing the structural causes of violence against women and girls and secure women's economic justice; ensuring increased civic participation and state accountability for the redistribution of resources and delivery of quality, gender-responsive public services; strengthening resilient livelihoods and secure climate justice and; driving transformative women-led emergency preparedness, response and prevention.

### 5.2 Organisational structure and management system

The ActionAid Group manager is ActionAid International Kenya (ActionAid Kenya). It holds the delegated responsibility by AAI to coordinate Core Humanitarian Standard (CHS) compliance for the Federation (thus its responsibilities go beyond the Group here considered) and is the delegated lead on Accountability in Emergencies.

The organisational structure for the ActionAid Group is not yet in place. However, the ActionAid Group is in discussion with AAI to establish an ActionAid Group management system that will:

- a. Provide clearly defined terms of reference for supporting ActionAid Group members to integrate CHS compliance requirements in their programmes
- b. Take responsibility for monitoring and ensuring that ActionAid Group and its members conform to the CHS commitments
- c. Document all reviews, progress and performance of all the group members systematically and consistently.

It is envisaged that coordination between ActionAid Kenya, affiliates such as ActionAid Denmark and ActionAid UK and the Global Secretariat will support the implementation of the delegation on Accountability in Emergencies and ActionAid Group responsibilities. More specifically it is expected that the Global Secretariat will:

- a. Support the delegation (and Group) to raise funds for the outlined work
- b. Formulate ways of working that will support compliance to CHS for members of the Group countries. This will be done in collaboration with ActionAid International Humanitarian Action and Resilience Team (IHART) and the Human Resources (HR) Department.

Members of ActionAid Group will be expected to:

- a. Avail and dedicate staff to support CHS integration within their programmes and projects
- b. Cost share in the implementation of delegated accountability activities (specifically cover travel costs of staff and partners)
- c. Promote and strengthen local national rootedness in international engagements
- d. Integrate CHS into their humanitarian programming, policies and practice
- e. Participate in joint planning and monitoring.

The role of AAI in reference to ActionAid Group members is also relevant from an ActionAid Group governance and management perspective. AAI's Oversight Standing Committee (OSC) for the Core Humanitarian Standard is convened by the Executive Director of ActionAid Kenya as the holder of the Accountability in Emergencies delegation. It provides oversight for the ActionAid Group's quality assurance and is responsible for: implementing the administrative requirements of the ActionAid Group quality assurance scheme; implementing management and/or monitoring responsibilities at the group level; developing a management responsibility framework for the ActionAid Group; coordinating compliance in line with the HQAI audit results; and communicating with HQAI and with ActionAid Group members.

Some other key AAI roles and structures that have a bearing on how ActionAid Group functions include:

- a. Affiliates are autonomous entities with their own board of directors and Country Programmes have their own management structure but are line managed by the Global Secretariat and do not have their own boards.
- b. AAI has a suite of centralised policies, guidance manuals and protocols that apply to all affiliates, associated and country programmes.
- c. The Global Secretariat provides support during major emergencies including international fundraising, communications in emergencies (including Rapid Action Communication in Emergencies (RACE), HR, finance and internal audit.
- d. AAI delegations are nominated members of AAI which lead on specific initiatives or projects on behalf of the wider federation. These include delegations to ActionAid Group members: Accountability in Emergencies led by Kenya; Women Leadership and Protection in Emergencies led by Nepal and Palestine; Resilience and Climate Change led by Bangladesh; Fundraising led by UK; and Communications in Emergencies led by UK.
- e. AAI's Humanitarian Action and Resilience Team (IHART) provides technical and practical support to members/country programmes on emergency preparedness, response and resilience building and includes roving humanitarian advisers. IHART also manages the Disaster Preparedness and Response Fund (DPRF) – AAI's rapid funding mechanism to initiate emergency responses.
- f. AAI's Emergency Fast Action and Support (EFAST) team are deployed from a roster to work alongside local staff and partners to implement high quality emergency response programmes. EFAST members are recruited into one of 19 sectors including accountability, finance, HR, disaster risk reduction (DRR) and resilience. In addition to the global EFAST that



is managed by IHART, members/countries are encouraged to develop national EFAST rosters to cover the skills likely to be required in the event of an emergency.

### 5.3 Group quality assurance

The ActionAid Group does not have quality assurance mechanisms (see also 7.1.2). The intention of the ActionAid Group is to use the findings of this verification audit to establish the mechanisms required for the management of the ActionAid Group.

### 5.4 Certification or verification history

AAI was certified by People in Aid in 2015. ActionAid India, one of the members of the ActionAid Group, was certified by People in Aid in 2016. However, this is the first time that any members of AAI are pursuing verification against the Core Humanitarian Standard, either individually or as a group.

## 6. Sampling

### 6.1 Rationale for sampling

A review of the current 16 members of the ActionAid Group was conducted and led to the shortlisting of 5 members: ActionAid UK, ActionAid Kenya, ActionAid Denmark, ActionAid Haiti and ActionAid Bangladesh. The selected members are representative of the ActionAid Group's membership (four affiliates and one country programme) and the audit team also interviewed representatives of the Global Secretariat (IHART).

ActionAid Kenya (AAIK) was selected because it is the manager of the ActionAid Group, the global lead for the delegation for Accountability in Emergencies and has a long history of accountability work. Malindi in Kenya was selected because it offered a wide breadth of long standing humanitarian and resilience work implemented by AAIK. The partners in Malindi represent the core of AAIK humanitarian work as well as being representative of how AAIK engages with and involves communities in their work through the active engagement of local committees and partners in project implementation. There was also an active response to an emergency at the time of the audit visit, which was an opportunity to see AAIK's work during an active humanitarian response.

Action Aid Bangladesh (AAB) was primarily selected due to the concentration of humanitarian activities undertaken in the last twelve months and the alignment of these responses to funding from ActionAid UK, which was also included in the sample of group members. The sites within Cox's Bazaar were selected for their breadth of projects. Camps 11 and 12 in the Rohingya refugee camp in Cox's Bazaar were host to AABs projects that represented AAB's focus on women's empowerment; community accountability, a first site management project, and work in water and sanitation. A third site was also selected to accommodate a project managed by AAB's primary partner in Bangladesh, to inform the audit team's understanding of how AAB works with partners in humanitarian responses.

The audit team selected ActionAid UK because of its role in supporting AAK to deliver the accountability agenda within the ActionAid federation and because of its status as a fundraising and capacity builder to several country programmes that are part of the Group, including some countries to be visited by the audit team.

The audit team selected ActionAid Palestine to represent the country programmes included in the Group. However, the unrest at the time of verification made it impossible to schedule a visit. ActionAid Haiti (AAH) was selected instead because of the country's exposure to humanitarian crisis in the past, including political crisis, earthquakes and hurricanes, the most recent being Hurricane Matthew which struck the south west part of Haiti in October 2016 affecting 2.1 million

people, of which 1.4 million people were in need of humanitarian assistance. ActionAid's response included distribution of non-food items (cholera/hygiene kits) and inputs for resilience building (providing seeds for the winter cropping season); and the implementation of cash transfer, protection and livelihoods programmes. All activities are underpinned by trainings on accountability, building back better, protection, hygiene and entrepreneurship.

ActionAid Denmark was selected because it represents the push from donor bodies to ensure that INGOs that are supported to facilitate humanitarian assistance are CHS compliant and work with partners/entities that are CHS compliant. Furthermore, AA Denmark has integrated accountability in its new Humanitarian Programme with IHART, AAK, ARI (Arab Region Initiative covering Jordan and Lebanon) and AA Palestine and would offer a good perspective on progress made so far in regards to CHS compliance.

The audit team selected projects at programme sites (in consultation with the ActionAid Group members) based on their representativeness of the humanitarian programme, scale and ability to be verified within the proposed timeframe. Community members were generally self-selected. ActionAid Group members selected (programmatic, financial, human resources) management and staff for interview based on their knowledge and responsibility for implementing CHS commitments. The audit team selected further interviewees to ensure objectivity.

### 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 Interviews:

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

Position of interviewees	Number of interviewees
UK	
Action Aid UK	15
IHART	4
Kenya	
Country office	8
Field staff	2
Local government	2
Haiti	
Country Office	7
Partners	3
Local government	1
Bangladesh	

Country Office	5
Coxes Bazar	6
Partner	2
Denmark	
Action Aid Denmark	11
<b>Total number of interviews</b>	66

### 6.2.2 Focus Group Discussions (interviews with a group >6)

Type of Group	Number of participants	
	Female	Male
<b>Haiti</b>		
Beaumont- community and committee	12	2
Abricot- community and committee	4	3
Abricot- community and committee	9	
Buvette- community and committee	9	
Grand Vincent- community only	2	4
Grand Vincent- committee only	5	1
<b>Bangladesh</b>		
Refugee group—WATCH group	6	1
Refugee group- NFIs, food	10	
Refugee group- women's friendly space	20	
Refugee group (Majhi)		10
Field facilitators	4	4
<b>Kenya</b>		
Dagamura – community and committee		7
Dagamura – community and committee	13	
Garashi – committee (men)		6
Garashi – committee (women)	9	
Kilifi town – committee	5	10
<b>Total number of participants</b>	108	48

## 7. Report

### 7.1 Overall group performance

#### 7.1.1 Group members:

ActionAid Group members are bound by AAI's humanitarian signature, which includes a commitment to accountability to affected populations, and its broader commitment to the accountability agenda. ActionAid Group members perform well against the CHS, primarily because they work within AAI's ethos, approach and organisational culture, which is aligned with the principles underlying the CHS. ActionAid Group members' humanitarian responses generally take place where they have an existing presence, which provides a strong basis for designing and delivering programmes to meet community needs, build on capacities and address issues that arise.

ActionAid Group members are committed to localisation principles and have strong and genuine partnership arrangements (characterised by open dialogue, joint planning, implementation and monitoring), which contribute to accountability throughout programmes. ActionAid Group members emphasise community involvement, transparency, openness and social accountability during implementation of projects. For example, communities actively participate in the design, implementation and monitoring of projects, and complaints mechanisms.

#### 7.1.2 Group level:

**SEE ADDENDUM PAGE 22 FOR UPDATED SUMMARY OF GROUP LEVEL PERFORMANCE**

Strengths in the delivery of CHS are attributable to respective ActionAid Group members and not as a result of the functions of the ActionAid Group. The audit team is satisfied that the approach and ethos is sufficiently similar across the sample and that the results are similar across the ActionAid Group.

At the time of the audit ActionAid Group lacked the basic elements of a management system for the Group, making it *de facto* still non-functional. Missing elements include: MoUs signed by the members; requirements for monitoring and audit; due diligence and capacity building for members; attention to staff safety and security; and ActionAid Group documentation. See table below.

Further consideration whether ActionAid Group can be incorporated in the independent verification scheme needs to be postponed until the major non-conformities related to the implementation of the group - not the application of the CHS - are resolved (see 7.2 Summary of Weaknesses, Group level, below).

N°	Indicator	Findings / Evidence	Score
<b>G1</b>	The Group has between 3 and 20 members	Confirmed	3
<b>G2</b>	There are no members with more than 5 country programmes	Confirmed	3
<b>G3</b>	The group members are autonomous organisations within the scope of the audit (i.e. members have an identified central function at which the activities covered by the scope of the audit are planned, controlled or managed)	Confirmed for 11 affiliates. HQAI accepts that five country programmes have sufficient autonomy to be included	3
<b>G4</b>	The group manager has the legal authority to manage and enforce all the requirements of the group scheme	This is informally agreed but not set out in a legally binding document	1

<b>G5</b>	The responsibilities of the group entity, manager and group members are clearly and legally attributed	Not in place	0
<b>G6</b>	The group entity has mechanisms in place to control declarations of members in regards to their belonging to the group, verification status, use of certification mark and certificate	Not in place	0
<b>G7</b>	The group entity has an up to date register of all the group members	Confirmed	3
<b>Group members</b>			
<b>G8</b>	Members formally commit to abide by the membership requirements	Country directors committed to membership through emails but are unlikely to be aware of the range of membership requirements by means of, for example, an MoU	1
<b>G9</b>	Members are aware of the rules for resignation and expulsion from the group	Country directors committed to membership through email. Without any MoUs signed, members are not aware of the rules for resignation and expulsion from the group	0
<b>Verification only</b>			
<b>G10</b>	Members commit to the continuous application of the standard	Members have not formally committed to the continuous application of the standard	0
<b>G11</b>	Members commit to the resolution of their major weaknesses within 4 years	Members have not formally committed to the resolution of major weaknesses	0
<b>Group Quality Assurance</b>			
<b>G12</b>	The sampling rate for quality assurance of the group is at a minimum 80% of the square root of the number of members	The group has not defined quality assurance sampling rates	0
<b>G13</b>	All the members are covered by the quality assurance processes of the group over a 5 years cycle	The group has no guidance on quality assurance processes	0
<b>G14</b>	The procedures for monitoring/auditing are defined, including: a. The criteria for sampling; b. Recruitment and training of internal auditors; c. The criteria to be monitored at each audit, covering at a minimum all the membership requirements; d. How to carry out field audits; e. The issuance of CARs; f. The quality control of the audits.	The group has no monitoring/auditing procedures	0
<b>G15</b>	Corrective Action Requests are issued when relevant	No CARs have been issued. Processes and procedures for issuing CARs are not in place	0
<b>G16</b>	The resolution of CARs is followed up adequately by the group entity	No CARs have been issued. Processes and procedures for following up on CARs issued are not in place	0
<b>G17</b>	The frequency of audits is at a minimum annual, and increased if circumstances dictate, and especially when major non-conformities are issued	The frequency of audits is not yet agreed or communicated to the members	0
<b>G18</b>	There are sufficient resources attributed to monitoring and auditing	The group has not formally allocated resources to group monitoring and auditing	0

<b>G19</b>	The monitoring/auditing is independent and impartial	No group monitoring/auditing guidance is in place	0
<b>G20</b>	Stakeholders, especially communities and people affected by crisis, provide inputs in the monitoring and audit processes of the group	Stakeholders do not provide input to group monitoring and audit processes	0
<b>Group management</b>			
<b>G21</b>	Documents related to the group management are up to date and available	There are no group management documents in place	0
<b>G22</b>	Records include information about members: a. Partnerships agreements; b. Internal audits/monitoring records; c. Project records	Records available include the list of countries that have confirmed participation, number of projects in the country, staff in-country and annual country budgets  No partnership agreements have been signed and there are no project, monitoring or audit records in place	0
<b>G23</b>	Procedures to accept new members include a due diligence process to check, at a minimum, the organisational capacity to implement the CHS	There are no procedures in place for conducting due diligence/ organisational capacity prior to accepting members. There is no evidence of any due diligence/ capacity assessment having been conducted	0
<b>G24</b>	Procedures exist to address complaints about members	The group entity has no specific complaints procedures in place to address complaints about Group members	0
<b>G25</b>	Complaints can trigger extraordinary audits	There are no guidelines or procedures on how extraordinary audits are triggered	0

## 7.2 Summary of Weaknesses

SEE ADDENDUM PAGE 22 FOR UPDATED SUMMARY OF WEAKNESSES

Weaknesses	Type (Minor/Major)	Time for resolution
<b>Group level</b>		
2018–G4: The ActionAid Group does not have a legally binding document that is signed by members, to manage and enforce the requirements of the Group scheme	Major	See preconditions
2018–G6: The ActionAid Group does not have mechanisms to control declarations of members in regards to their belonging to the Group, verification status, use of certification mark and certification	Major	See preconditions
2018–G8: ActionAid Group members have not signed formal agreements to commit to abide by the membership requirements	Major	See preconditions
2018–G9: ActionAid Group members are not aware of the rules for resignation and expulsion from the Group	Major	See preconditions
2018–G10: ActionAid Group members have not committed to the continuous application of the standard	Major	See preconditions
2018–G11: ActionAid Group members have not committed to the resolution of their major weaknesses within 4 years	Major	See preconditions
2018–G12: The ActionAid Group has not defined quality assurance sampling rates	Major	See preconditions
2018–G13: The ActionAid Group has no guidance on quality assurance processes	Major	See preconditions
2018 – G14, G19: The ActionAid Group has no monitoring/auditing procedures	Major	See preconditions
2018–G15, G16: The ActionAid Group does not have processes and procedures for identifying non-conformance and, issuing and resolution of CARs	Major	See preconditions
2018–G17: The frequency of audits is not agreed or communicated to the ActionAid Group members	Major	See preconditions
2018 – G18: The ActionAid Group has not formally allocated resources to group monitoring and auditing	Major	See preconditions
2018–G20: ActionAid Group members do not provide input to group monitoring and audit processes	Major	See preconditions
2018–G21: There are no group management documents in place	Major	See preconditions
2018–G22: No partnership agreements have been signed between the ActionAid Group entity and ActionAid Group Members and there are no project, monitoring or audit records in place	Major	See preconditions
2018–G23: ActionAid Group does not have procedures for conducting due diligence/ organisational capacity prior to accepting members. There is no evidence of	Major	See preconditions

any due diligence/ capacity assessment having been conducted		
2018–G24: The ActionAid Group does not have specific complaints procedures in place to address complaints about ActionAid Group members.	Major	See preconditions
2018–G25: ActionAid Group does not have guidelines or procedures on how extraordinary audits are triggered.	Major	See preconditions
<b>TOTAL Number (Group level)</b>		18
<b>Standard Commitments level</b>		
2018-2.4: ActionAid Group members do not sufficiently utilise the technical expertise available throughout the federation to plan and assess programmes or refer sufficiently to relevant technical standards, particularly at the early stages of a programme.	Minor	24 months from the verification decision
2018-3.6: ActionAid Group members do not systematically identify the full range of potential or actual unintended negative effects	Minor	24 months from the verification decision
2018-3.8: ActionAid Group members do not have formal systems to safeguard data flows across members, nor the federation, and some information at programme sites is not sufficiently secured.	Minor	24 months from the verification decision
2018-5.1 ActionAid Group members do not systematically consult communities on the design, implementation and monitoring of complaints handling processes	Minor	24 months from the verification decision
2018-5.3: There is generally limited awareness on the process for escalating complaints from communities to partners, partners to ActionAid Group members and ActionAid Group members who are operational to relevant members of AAI who support those programmes	Minor	24 months from the verification decision
2018- 8.2: ActionAid Group members do not systematically ensure that staff fully understand policies that are relevant to them.	Minor	24 months from the verification decision
2018-8.9: ActionAid Group members do not comprehensively or systematically protect staff from exposure to unnecessary threats to their physical and emotional health.	Minor	12 months from the verification decision
2018-9.4: ActionAid Group members do not have formal mechanisms to undertake reviews of effects of programmes on the environment.	Minor	24 months from the verification decision
<b>TOTAL Number (Commitments level)</b>		8



### 7.3 Group members: Strong points and areas for improvement:

#### Commitment 1: Humanitarian assistance is appropriate and relevant

Score: 2.33

ActionAid Group members' focus on responding where they have existing programmes and partners helps to ensure that they have a strong understanding of the context and stakeholders. A focus on community participation also ensures useful input from communities that ActionAid Group members use to design impartial programmes that target the poor and vulnerable. Group members use a range of mechanisms (such as participatory reviews) to adapt programmes in line with changing needs and capacities. Group members had not addressed some significant emerging needs at the time of verification visits although the audit team recognise that these were generally outside their remit. Group members' data collection systems disaggregate by sex and age but not other significant vulnerabilities such as disability.

##### Feedback from people affected by crisis and communities on Commitment 1

Communities state that ActionAid Group members' assistance is appropriate to their needs and capacities and that they adapt programmes in line with changing circumstances. They find the Group members to be fair and impartial in delivery of assistance.

#### Commitment 2: Humanitarian response is effective and timely

Score: 2.2

ActionAid Group members' focus on responding through existing partners where they have an operational presence means that they generally have the organisational capacity to meet their commitments and respond in a timely manner - particularly to sudden onsets, taking decisions and responding in a timely manner. Slow onsets are not categorised as timely. ActionAid Group members' programmes are generally realistic and safe and frequently designed with safety in mind. However, the Group members do not systematically undertake timely and/or comprehensive risk assessments. They do not fully utilise the technical capacity available throughout the federation and there is a recognition that they do not employ sufficient 'hard' technical skills. The Group members generally refer unmet needs outside their remit to organisations with relevant technical expertise. They monitor activities and outputs but less frequently outcomes; but they adapt programmes based on findings from monitoring activities.

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

Communities generally stated that ActionAid Group members' programmes are realistic and safe and all expressed satisfaction with the timeliness of their responses.

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

Score: 2.7

ActionAid Group members' commitment to resilience, women's leadership in emergencies and responding through existing structures means that it has a strong focus on strengthening local capacities and enabling communities and people affected by crisis to be more resilient to shocks. ActionAid's human rights-based approach promotes a focus on preventing negative effects although ActionAid Group members do not systematically identify the full range of potential unintended negative effects, particularly those where formal analysis is required. The ActionAid federation was an early advocate and adopter of the localisation agenda and the programmes of the Group members are designed to promote early recovery and support the local economy. Group members also support communities to develop preparedness plans and work with them to develop their capacity as first responders.

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

ActionAid Group members' approach and interventions make communities feel stronger and much more capable of living and working independently of Group members. Programmes support the local economy and communities identified no negative effects of programmes.

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

**Score: 3.6**

Transparency, accountability and participation are core values for ActionAid Group members. They make key information publicly available via their websites and have well established practices for sharing information with communities in locations where they have a long-term presence. Group members have sometimes found it challenging to ensure information reaches all community members in large-scale rapid response contexts. Although communities report a good understanding of behavioral expectations of staff, ActionAid Group members do not explicitly promote information on how staff should behave or how community members can report concerns regarding staff behaviour.

ActionAid Group members work closely with local partners and local community structures to build local capacity to manage the design, procurement and implementation of emergency response programming. They consult with communities to ensure that committee membership is representative of vulnerable and marginalised groups. They insist on women's membership in community structures and provide training for women to enable their participation and capacity for leadership.

ActionAid Group members' fundraising and communications work actively engages people living in poverty, respecting them as rights holders and representing them as active agents with the power to change their own lives.

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

Communities report that ActionAid Group members provide good access to information and promote opportunities for their full participation in all stages of a humanitarian response. Communities report a good understanding of expected staff behaviours.

#### Commitment 5: Complaints are welcomed and addressed

**Score: 1.7**

Accountability to disaster affected communities is a core part of AAI's humanitarian signature and the culture of complaints handling is well established among ActionAid Group members. When Group members respond where they have previously had a presence, they generally consult communities and people affected by crisis on the design, implementation and monitoring of complaints handling processes. However, engagement and involvement of the communities in the establishment of complaints mechanisms is generally not documented.

Group members welcome complaints informally (e.g. during interactions between staff and communities) and formally (e.g. through phone-based systems). It is however, not clear what complaints are to be escalated (from communities to partners, partners to ActionAid Group members or from implementing affiliates to funding affiliates) and limited complaints are escalated or reports provided regarding what implementing affiliates do with the complaints they receive.

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

Communities report that ActionAid Group members generally provide them with opportunities to participate in the design and implementation of safe and responsive complaints mechanisms. Communities are generally aware of expected staff behavior although this is primarily because of AAI's (and group members) rights-based approach and not because they are specifically informed.

## Commitment 6: Humanitarian response is coordinated and complementary

Score: 2.3

ActionAid Group members' strong commitment to coordination is demonstrated by their reluctance to respond to crises unless they have an existing presence. In (at least) one instance, a group member fundraised for a joint appeal with other donors although it was not operational in country and would not receive any of the funding. ActionAid Group members work with a range of stakeholders at the international, national and community levels in the implementation of strategic, contingency and response plans. They participate (and support partners' participation) in national and subnational coordination mechanisms to complement government and other stakeholders' responses and minimise duplication; and share relevant information with stakeholders through these coordination mechanisms.

AAI's humanitarian training includes a module that addresses the linkages between Coordination and Programme Quality. ActionAid Group members' field teams are trained on this module in preparation for emergency response. Group members sign MOUs/ agreements with collaborators/partners with clear principles, and clear financial and administrative roles and responsibilities. However, they do not always formally identify the capacities and interests of their partners.

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

Communities report that ActionAid Group members participate in existing coordination structures and coordinate their response with local authorities and other organisations.

## Commitment 7: Humanitarian actors continuously learn and improve

Score: 2.3

ActionAid Group members ensure that programmes are responsive to local priorities and capacities through a continuous cycle of reflection, learning, innovation and adaptation. There are many examples of innovations ActionAid Group members have made to their programming approach in response to learnings. AAI has used learning to inform key guidance manuals that are widely used by ActionAid Group members. The Group members have good examples of participating in collaborative learning and sharing projects at the international level and participating in interagency working groups. Internally, AAI has an active culture of networking and informal learning among staff that includes ActionAid Group members.

However, ActionAid Group members lack quality assurance systems to ensure that learning is captured, analysed, consolidated, and applied to future responses. It does not systematically share findings of evaluations with relevant staff, partners and communities and it lacks mechanisms for documented learnings to be easily accessed across ActionAid Group members and the federation.

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

Communities reported that they are actively involved in reflection exercises and have the opportunity to adapt programs in response to learnings. Some communities reported that ActionAid Group members had shared the findings of evaluations, and others reported that they hadn't.

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

Score: 2.4

ActionAid Group members have well established protocols for documenting job descriptions and undertaking staff recruitment. They have policies at the country level that outline training, development and learning opportunities for staff and have an established performance management system. AAI supplements capacity at the country level with a system of international delegations and a surge roster. In some cases, however, ActionAid Group members have not fully identified and fulfilled technical and operational staffing needs and this makes programs less responsive.

ActionAid Group members' staff are aware of relevant AAI policies and have a good understanding of behaviours that are expected of them and those that would constitute misconduct. However, staff do not consistently sign a code of conduct or similarly binding document. AAI has recently developed a new Staff Code of Conduct and Safeguarding and Prevention of Sexual Exploitation and Abuse Policy, but these are yet to be rolled out to ActionAid Group members and their staff. Group members do not consistently provide refresher training on policies relating to conduct.

AAI's global human resource standards outline policies to support staff health and well-being, but attention to staff well-being, safety and psychosocial support is poor among ActionAid Group members at the country office level. Each Group member has a safety and security plan, but do not quality assure that these are current or have sufficient coverage. The safety and security provisions for staff working in their own country are less comprehensive than for those working internationally.

Staff reported that external recruitment processes are fair and transparent and that HR policies more broadly are non-discriminatory and promote equal employment opportunities. Staff reported that attention to safety and security at all levels should be improved, but with particular attention to safety and security provisions for local staff.

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

Communities reported that staff are respectful and professional in their interactions with them.

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

Score: 2.33

AAI's policy base covers all aspects of resource management, with the exception of the environment, on which AAI has limited guidance. ActionAid Group members' systems and procedures for designing and implementing programmes balance quality, cost and timeliness- particularly where it is responding through existing partners and structures. Processes and procedures (e.g. finance, procurement) help drive efficiency. ActionAid Group members systematically monitor and report on budget and take corruption seriously where it is suspected or discovered.

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

Communities are made aware of ActionAid Group members' programme budgets and express satisfaction with how they allocate and use resources. Communities were not aware of any instances of financial misappropriation.

## 8. HQAI's decision

<b>Decision on the inclusion in the Independent Verification Group Scheme</b>	
Registration in the verification scheme:  <input type="checkbox"/> Accepted <input type="checkbox"/> Refused <input checked="" type="checkbox"/> Conditioned	
Closure of major non-conformities Group level indicators before 2019-09-30	
Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative	Date: 2018-10-01

### 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.*

## I. Addendum to the report – 2019-05-20

ActionAid Group has taken a range of actions since the initial report in order to ensure it meets the requirements for groups. These include signing MoUs with group members, allocating resources to monitoring and audit (and adopting the HQAI audit manual while it develops its own), and developing due diligence assessments based on the CHS.

The audit team is satisfied that ActionAid Group meets group requirements as defined by POL500 – Groups policy. See below for the detailed requirements.

### 1. Summary of group level performance

N°	Indicator	Findings / Evidence	Score
<b>G1</b>	The Group has between 3 and 20 members	Confirmed	3
<b>G2</b>	There are no members with more than 5 country programmes	Confirmed	3
<b>G3</b>	The group members are autonomous organisations within the scope of the audit (i.e. members have an identified central function at which the activities covered by the scope of the audit are planned, controlled or managed)	Confirmed for 11 affiliates. HQAI accepts that five country programmes have sufficient autonomy to be included	3
<b>G4</b>	The group manager has the legal authority to manage and enforce all the requirements of the group scheme	The International board has approved the Oversight Standing Committee (OSC) to manage the process.	3
<b>G5</b>	The responsibilities of the group entity, manager and group members are clearly and legally attributed	The group policy statement outlines the OSCs role and responsibilities as well as overall responsibilities of group members, which are further elaborated in MoUs.	3
<b>G6</b>	The group entity has mechanisms in place to control declarations of members in regards to their belonging to the group, verification status, use of certification mark and certificate	Per the group policy statement, group management controls the use of claims, verification status, and certification marks. This policy prohibits any member of the group from claiming that is independently verified by HQAI as an individual member.	3
<b>G7</b>	The group entity has an up to date register of all the group members	Confirmed	3
<b>Group members</b>			
<b>G8</b>	Members formally commit to abide by the membership requirements	MoUs contain membership requirements	3
<b>G9</b>	Members are aware of the rules for resignation and expulsion from the group.	Section 4 of the MoU provides reasons for expulsion, including failure to implement corrective actions, a non compliance with terms set out in the MoU	3
<b>Verification only</b>			
<b>G10</b>	Members commit to the continuous application of the standard.	Section 2.1 of the MoU commits members to 'Integrate CHS into their humanitarian	3

		programming, policies and practice and commit to the continuous application of the standard.	
<b>G11</b>	Members commit to the resolution of their major weaknesses within 4 years	MoUs commit to continuous application of the standard and include failure to implement corrective actions as grounds for expulsion from the group.	3
<b>Group Quality Assurance</b>			
<b>G12</b>	The sampling rate for quality assurance of the group is at a minimum 80% of the square root of the number of members.	The group policy statement states that it will utilize the HQAI guidelines for sampling... 'the next integer of 80% square root of the total number of members'	3
<b>G13</b>	All the members are covered by the quality assurance processes of the group over a 5 years cycle	Per Group policy statement 'The Oversight Standing Committee shall monitor the members' performance to check compliance with the group membership and quality assurance requirements including their members' individual improvement plans.' The M&E plan outlines requirements for non-audited countries to complete self assessments by June 2019.	3
<b>G14</b>	The procedures for monitoring/auditing are defined, including: a. The criteria for sampling; b. Recruitment and training of internal auditors; c. The criteria to be monitored at each audit, covering at a minimum all the membership requirements; d. How to carry out field audits; e. The issuance of CARs; f. The quality control of the audits.	ActionAid Group has agreed with HQAI to use its auditing procedures while it adapts them to meet its needs; the following are relevant aspects of the manual and own arrangements <ul style="list-style-type: none"> <li>a. The audit manual describes sampling criteria</li> <li>b. AAG has informal plans to use regional staff as auditors and is discussing recruitment and training of internal auditors with HQAI but does not have a formal agreement</li> <li>c. The audit manual describes how to audit all criteria related to the standard <b>but not how to audit group requirements.</b></li> <li>d. The audit manual describes how to audit field audits.</li> <li>e. The audit manual describes how to issue CARs.</li> <li>f. The audit manual briefly describes quality control.</li> </ul>	2
<b>G15</b>	Corrective Action Requests are issued when relevant	No CARs have been issued yet. The group policy statement states 'When a members does not comply with the group membership requirements including non-implementation of the recommendations of any monitoring/audit report, then Correctives Actions Request shall be issued'. This has not been an issue as yet.	3
<b>G16</b>	The resolution of CARs is followed up adequately by the group entity	The group has not issued any CARs – the audit manual describes how to track resolution of CARs.	3
<b>G17</b>	The frequency of audits is at a minimum annual, and increased if circumstances dictate, and especially when major non-conformities are issued	The audit manual prescribes annual audits and for more frequent audits in the event of major non-conformities.	3

<b>G18</b>	There are sufficient resources attributed to monitoring and auditing	AAGs budget has been updated to include a range of resources, including: <ul style="list-style-type: none"> <li>• Accountability in Emergencies advisory</li> <li>• MoUs with IHART and AAUK for committed funds that can be redistributed to monitoring and audits.</li> </ul>	3
<b>G19</b>	The monitoring/auditing is independent and impartial	The audit manual describes the need for independence and impartiality.	3
<b>G20</b>	Stakeholders, especially communities and people affected by crisis, provide inputs in the monitoring and audit processes of the group	The audit manual provides comprehensive guidance on ensuring communities and people affected by crisis provide input to audit processes, which review monitoring processes as part of the audit criteria.	3
<b>Group management</b>			
<b>G21</b>	Documents related to the group management are up to date and available	Documents include the Group Policy Statement, MoUs, OSC ToRs and minutes	3
<b>G22</b>	Records include information about members: a. Partnerships agreements; b. Internal audits/monitoring records; c. Project records	ActionAid Group has established folders for each group members that include MOUs, reporting, self-assessments, audits, and improvement plans. Records available include the list of countries that have confirmed participation, number of projects in the country, staff in-country and annual country budgets	3
<b>N G23</b>	Procedures to accept new members include a due diligence process to check, at a minimum, the organisational capacity to implement the CHS	AAGs capacity assessment covers all nine CHS commitments and requests evidence to support members' contentions regarding their ability to implement the standard.	3
<b>G24</b>	Procedures exist to address complaints about members.	Per the Oversight Standing Committee ToR, complaints about groups members' activities, or the group management, shall be raised to and addressed by the Oversight Standing Committee. The OSC TORs states that it is 'Responsible of complaints handling including keeping up to complaints register. A complaint towards a group member or the Oversight Standing Committee, should be made in first instance to the Oversight Group Committee; if this is deemed not appropriate, ActionAid's Whistleblowing Policy should be followed'. The April 2019 meeting of the OSC agreed to revise and clarify how complaints about members should be handled <b>but this has not been completed as yet.</b>	2
<b>G25</b>	Complaints can trigger extraordinary audits	MoUs state that complaints can trigger extraordinary audits.	3

## 2. Summary of weaknesses



<b>Weaknesses</b>	<b>Type (Minor/Major)</b>	<b>Time for resolution</b>
<b>Standard Commitments level</b>		
2018-2.4: ActionAid Group members do not sufficiently utilise the technical expertise available throughout the federation to plan and assess programmes or refer sufficiently to relevant technical standards, particularly at the early stages of a programme.	Minor	2021-05-20
2018-3.6: ActionAid Group members do not systematically identify the full range of potential or actual unintended negative effects	Minor	2021-05-20
2018-3.8: ActionAid Group members do not have formal systems to safeguard data flows across members, nor the federation, and some information at programme sites is not sufficiently secured.	Minor	2021-05-20
2018-5.1 ActionAid Group members do not systematically consult communities on the design, implementation and monitoring of complaints handling processes	Minor	2021-05-20
2018-5.3: There is generally limited awareness on the process for escalating complaints from communities to partners, partners to ActionAid Group members and ActionAid Group members who are operational to relevant members of AAI who support those programmes	Minor	2021-05-20
2018- 8.2: ActionAid Group members do not systematically ensure that staff fully understand policies that are relevant to them.	Minor	2021-05-20
2018-8.9: ActionAid Group members do not comprehensively or systematically protect staff from exposure to unnecessary threats to their physical and emotional health.	Minor	2021-05-20
2018-9.4: ActionAid Group members do not have formal mechanisms to undertake reviews of effects of programmes on the environment.	Minor	2021-05-20
<b>TOTAL Number (Commitments level)</b>		<b>8</b>

### 3. HQAI's final decision

4.

#### Decision on the inclusion in the Independent Verification Group Scheme

Registration in the verification scheme:

<input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Refused <input type="checkbox"/> Conditioned	
<b>Next audits</b> Mid-term audit before: 2021-05-20	
Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative	Date: 2019-05-20

## 4. Organisation's report approval

### Acknowledgement and Acceptance of Findings

For Group Management representatives – 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