

ActionAid Group (AAG)

Mid-Term Audit – Summary Report 2022/01/17

1. General information

1.1 Organisation

Group name	ActionAid Group (AAG)		
Group manager	ActionAid Kenya		
Type	Mandates	Verified	
<input checked="" type="checkbox"/> International <input type="checkbox"/> National <input type="checkbox"/> Membership/Network <input checked="" type="checkbox"/> Federated <input checked="" type="checkbox"/> Direct Assistance <input checked="" type="checkbox"/> With partners	<input checked="" type="checkbox"/> Humanitarian <input checked="" type="checkbox"/> Development <input checked="" type="checkbox"/> Advocacy	<input checked="" type="checkbox"/> Humanitarian <input type="checkbox"/> Development <input type="checkbox"/> Advocacy	
Total number of members in group	16	Sample size	3
List of group members	ActionAid Affiliates (10): Australia, Bangladesh, Denmark, India, Ireland, Italy, Kenya, Nigeria, Palestine, United Kingdom. ActionAid Country Programmes (6): Arab Region, Ethiopia, Gambia, Haiti, Somaliland and Zimbabwe.		

1.2 Audit team

Lead auditor	Joanne O'Flanagan
Second auditor	Johnny O'Regan
Third auditor	Andrew Nzimbi
Observer	
Expert	
Witness / other	

1.3 Scope of the audit

CHS Scheme	Verification
Audit cycle	First
Phase of the audit	Mid-Term
Extraordinary or other type of audit	N/A

1.4 Sampling*

Group member	Randomly sampled project sites	Included in final sample	Replaced by	Rationale for sampling and selection of sites	Onsite or remote
Ireland	N/A	No	Zimbabwe	Ireland was replaced by Zimbabwe as it has no humanitarian projects in its current portfolio.	N/A
Zimbabwe	1. Lean Season Assistance Programme (LSA) 2. Provision of services to	Yes		Zimbabwe was not part of the random sample but was selected to replace Ireland. Zimbabwe has a range of humanitarian projects covering immediate relief and longer-	Remote (onsite)

	Zimbabwe Resilience Building Fund (ZRBF)			term resilience building projects.	
India	<ol style="list-style-type: none"> 1. Response to Cyclone Nivar and Burevi 2. Comprehensive Assistance to Refugees in Mewat 3. Disaster Preparedness and Risk Reduction - Jagatsinghpur, Puri & Bhadrak districts of Odisha 	Yes		India is a large ActionAid affiliate member and contributes to the geographical coverage of the sample. There is a diverse portfolio of projects covering emergency response to natural disasters, refugee assistance, and disaster preparedness/risk reduction across a number of regions, providing a range of project contexts for the sample.	Remote
Somaliland	<ol style="list-style-type: none"> 1. Unconditional Cash Based Transfers – Burao District of Togdheer region 2. Improving Resilience Livelihoods of Agropastoral communities in Gabiley and Marodijeh Regions 	Yes		Somaliland was selected as it represents a complex context with a relatively small team of core staff. The situation of Somaliland means that onsite travel is generally prohibited for security reasons. Conducting remote audit activities as a result of COVID 19 travel restrictions provided an opportunity to include Somaliland as a 'remote onsite' part of the sample, meaning audit activities would include staff, partner and community consultations.	Remote (onsite)

Any other sampling performed for this audit:

Due to COVID-19 travel restrictions no onsite assessment could be carried out of any Group Member. Within relevant COVID 19 health procedures, some onsite assessment of group management was conducted in Nairobi and London. In accordance with the HQAI sampling rates for a mid-term audit, three Group Members (affiliates and country programmes) were sampled, of which one was designated for onsite audit activities and two for remote audit activities. ActionAid Somaliland was originally selected for onsite audit activities however, given that remote audit techniques may impose limitations on audit findings, the auditors, in consultation with AAG, agreed to designate a second Group Member, Zimbabwe, for onsite activities. As a result, partner and community consultations were also included in the audit activities of ActionAid Zimbabwe.

Sampling risk:

Despite some limitations with remote auditing methodologies, the auditors are confident that the evidence obtained is sufficient and appropriate to provide a basis for their conclusions and recommendation. There is confidence that the Group Members sampled are representative of AAG members' portfolio of humanitarian programmes. Despite the use of remote technologies, it was possible to gather information through community consultations in two of the sampled sites. AAG management is led by ActionAid Kenya which is supported by the AAG Oversight Standing Committee (OSC). The OSC is constituted of members from a number of Group Members, including staff based in Nairobi and London, some of whom the auditors were able to consult in person, onsite.

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

2. Activities undertaken by the audit team

2.1 Locations Assessed

Locations	Dates	Onsite or remote
Somaliland	19 – 25 October 2021	Remote
Zimbabwe	21 – 29 October 2021	Remote
India	25 – 29 October 2021	Remote

2.2 Interviews

Position / level of interviewees	Number of interviewees		Onsite or remote
	Female	Male	
Group			
Management	4	3	Remote & onsite
Staff	4	2	Remote & onsite
Others	1		Remote
Members (Programme and Projects)			
Management	5	11	Remote
Staff	4	9	Remote
Partner staff	1	3	Remote
Others			
Total number of interviewees	19	28	

2.3 Consultations with communities

Type of group and location	Number of participants		Onsite or remote
	Female	Male	
1. Women's Group - Improving Resilience Livelihoods of Agropastoral communities (Somaliland)	5		Remote (Hargeisa)
2. Men's Group - Improving Resilience Livelihoods of Agropastoral communities (Somaliland)		5	Remote (Hargeisa)
3. Women's Group - Lean Season Assistance Programme (Zimbabwe)	3		Remote (Matare)
4. Men's Group - Lean Season Assistance Programme (Zimbabwe)		4	Remote (Matare)
Total number of participants	8	9	

2.4 Opening meeting

Date	2021/10/12
Location	Nairobi (onsite and remote)
Number of participants	14
Any substantive issues arising	None

2.5 Closing meeting

Date	2021/11/04
Location	London (onsite and remote)
Number of participants	12
Any substantive issues arising	The auditors noted that while there is evidence of a committed and active OSC, not all AAG members are fully clear on the formal requirements of group membership. Relatedly, the group level requirements regarding group auditing have not been adequately defined or operationalised. This gap has led to the identification of a Major Weakness with the group level requirements, specifically G14 and related Minor Weaknesses on G15, G17-20, G23.

2.6 Programme sites

Briefing

Date	2021/10/14
Location	Hargeisa (remote)
Number of participants	4
Any substantive issues arising	None

Briefing

Date	2021/10/18
Location	Harare (remote)
Number of participants	4

De-briefing

Date	2021/11/04
Location	London (onsite and remote) as part of audit closing meeting
Number of participants	12
Any substantive issues arising	None

De-briefing

Date	2021/11/04
Location	London (onsite and remote) as part of audit closing meeting
Number of participants	12

Any substantive issues arising	None
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Any substantive issues arising	None
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3. Background information on the organisation

3.1 General information

The ActionAid Group is comprised of ten ActionAid affiliates (Australia, Bangladesh, Denmark, India, Ireland, Italy, Kenya, Nigeria, Palestine, United Kingdom) and six ActionAid country programmes (Arab Region, 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.

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.

3.2 Governance and management structure

The ActionAid Group manager is ActionAid International Kenya (ActionAid Kenya) with support from ActionAid UK as the co-leads of the Accountability in Emergencies delegation which holds delegated responsibility by AAI to coordinate Core Humanitarian Standard (CHS) compliance for the Federation. A CHS Oversight Steering Committee (OSC) has been established to take responsibility for overall management and quality assurance of the AA CHS Group. The CHS OSC is convened by the Humanitarian Director of IHART from within ActionAid International. As outlined in the OSC Terms of Reference, the OSC is responsible for:

- a. Taking responsibility for monitoring and ensuring that ActionAid Group and its members conform to the CHS commitments;
- b. Providing the oversight on the centrally coordinated support to the 16 countries to complete the self-assessment against the CHS and to ensure that the findings/observations of HQAI auditors are appropriately addressed;

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- c. Agree on Country wide plans and resourcing and oversee implementation of agreed plans;
 - d. Support the Accountability delegation (and wider Group) to raise funds for the outlined work;
 - e. Formulate ways of working that will support compliance to CHS for members of the Group countries;
 - f. Commission the internal audits on compliance and reviewing the performance of the country teams on compliance with the CHS;
 - g. Decide on continuation/discontinuation of the countries in/from the group.

The Global Secretariat coordinates with the Accountability in Emergencies delegation and ActionAid Group to support members to meet their respective 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 are 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.

Some AAI roles and structures have a bearing on how ActionAid Group functions:

- a. Affiliates are autonomous entities with their own board of directors;
 - b. Country Programmes have their own management structure but are line managed by the Global Secretariat and do not have their own boards;
 - c. AAI has a suite of centralised policies, guidance manuals and protocols that apply to all affiliates, associated and country programmes;
 - d. 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;
 - e. 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;
 - f. 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;
 - g. 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.
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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.

3.3 Effectiveness of the governance, internal quality assurance and risk management of the Group

The ActionAid Group made good progress after the last audit in putting in place the basic elements of a management system necessary to establish the group, including appointment of the OSC to manage the process and developed the ToRs of the OSC.

The OSC has established the responsibilities of the group and its members and drafted MoUs that describe membership requirements and commitments. The OSC has supported members and overseen a process by which the majority of members complete self-assessments and improvement plans. During its meetings, the OSC considers issues generally faced by group members in meeting their commitments. However, it does not formally monitor each members' performance compliance with group requirements. The OSC adopted the HQAI audit manual to define its approach to quality assurance and auditing of group members. However, it has not yet met the requirements of that manual in relation to quality assurance and auditing such as recruiting and training internal auditors, carrying out field audits, or issuing CARs where necessary. Nor has the OSC adapted the audit manual or proposed alternative approaches to meeting its commitments.

4. Overall performance of the group

N°	Indicator	Summary of findings	Score
G1	The Group has between 3 and 20 members	AAG meets the eligibility criteria for a group.	3
G2	There are no members with more than 5 country programmes		3
G3	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)		3
G4	The group manager has the legal authority to manage and enforce all the requirements of the group scheme		3
G5	The responsibilities of the group entity, manager and group members are clearly and legally attributed		3
G6	The group entity has mechanisms in place to control declarations of members in regard to their belonging to the group, verification status, use of certification mark and certificate		3
G7	The group entity has an up-to-date register of all the group members		3
Group members			
G8	Members formally commit to abide by the membership requirements	AAG members commit to applying the requirement of the Group membership, in particular to apply the CHS and resolve any major weakness within 4 years.	3
G9	Members are aware of the rules for resignation and expulsion from the group		3
G10	Members commit to the continuous application of the standard		3
G11	Members commit to the resolution of their major weaknesses within 4 years/resolution of their CARs in due time		3
Group Quality Assurance (monitoring & auditing)			
G12	All the members are covered by the quality assurance processes of the group over a 5 years cycle	AAG supports its members to undertake self-assessments against the CHS. However, AAG	2

G13	The sampling rate for auditing of the group is at a minimum 80% of the square root of the number of members	has not defined its own approach to auditing group members (indicator G14). This results in a major weakness regarding the Group's quality assurance.	3
G14	The procedures for 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.		0
G15	Corrective Action Requests are issued when relevant		1
G16	The resolution of CARs is followed up adequately by the group entity		2
G17	The frequency of audits is at a minimum annual, and increased if circumstances dictate, and especially when major non-conformities are issued		1
G18	There are sufficient resources attributed to monitoring and auditing		1
G19	The monitoring/auditing is independent and impartial		2
G20	Stakeholders, especially communities and people affected by crisis, provide inputs in the monitoring and audit processes of the group		1
Group management			
G21	Documents related to the group management are up to date and available	Documents of the Group are up to date and recorded, with the exception of those related to audits, as the group auditing mechanism has not been put in place yet. AAG's capacity assessment covers all nine CHS commitments and requests evidence to support members in their ability to implement the standard. However, the present audit identified that at least a new member was able to join the group without a formal due diligence process.	2
G22	Records include information about members: a. Partnerships agreements; b. Internal audits/monitoring records; c. Project records		2
G23	Procedures to accept new members include a due diligence process to check, at a minimum, the organisational capacity to implement the CHS.		1
G24	Procedures exist to address complaints about members		2
G25	Complaints can trigger extraordinary audits		3

5. Overall performance of the group members (CHS)

5.1 How the Group members applies the CHS across their work

AAG members are committed to implementing CHS across all aspects of their work. The group has made targeted efforts to address some key areas of weakness in terms of compliance, and continues to make progress in several areas highlighted in the Initial Audit, however, sustained progress on addressing weaknesses in relation to the development of complaint handling mechanisms is limited.

AAG members show evidence of improvement on policy and practice including, PSHEA and safeguarding; data protection; and safety and security of staff. Further, the *International Environment Policy and Guidance* set out a pathway for improved consideration of the environment across policy and practice. There is also evidence of increasing effectiveness of information sharing with communities on expected behaviours of staff (PSHEA and fraud/corruption) and this is confirmed by the present audit's consultations with communities.

COVID-19, while presenting challenges, also provided an opportunity for AAG members to prioritise CHS commitments into COVID-19 response planning, and compliance with CHS was one of three key objectives of the COVID-19 RTE as well as other large-scale programme evaluation processes.

Notwithstanding ongoing improvements, AAG members should remain alert to systematic procedures and practices in regard to C5 in particular. While there is evidence that communities and people affected by crisis are aware of the expected behaviour of AAG staff, including commitments on the prevention of sexual exploitation and abuse, there is evidence to indicate that AAG members are still challenged to design, implement, document and formally manage appropriate and effective CHMs. Overall, AAG members do not perform strongly on C5, and a major weakness has been identified. Further, the issue of risk identification at the level of communities (including risks of unintended negative effects) is improving but it is not clear that this is systematic or consistent; this cuts across a number of commitments but particularly 3.6.

5.2 Performance of group members on PSEAH

AAG members have improved at designing programmes safely for communities and although identifying negative effects is an ongoing challenge, AAG have made strongest gains in relation to identifying negative effects in relation to PSEAH and informing communities about expected behaviour of staff. New and updated policies include guidance on child safeguarding (CS), protection from sexual harassment, exploitation and abuse (PSHEA) and the federation's most recently updated Code of Conduct (all 2019). These policies cover the establishment of complaint handling procedures and processes and describe how complaints are received, managed and investigated. Timeframes for response are set out and the roles and responsibilities of SHEA and Safeguarding Focal Points (FPs) and the Global SHEA and Safeguarding Team are outlined. Notwithstanding these improvements, particularly at policy level, including high levels of staff awareness and understanding of commitments on PSEAH, AAG members still need to ensure systematic development of documented, locally contextualised and formalised procedures to ensure complaint handling mechanisms cover programming, sexual exploitation and other abuses of power.

5.3 Performance of group members on localisation

AA Group members perform strongly in relation to localisation, in keeping with its principle that value local ownership, best exemplified by being the first major northern agency to relocate its secretariat to the global south. Its strategies and programmatic approach focus on resilience and strengthening local ownership and leadership, particularly of vulnerable groups such as women. AAG group members approach to crisis recovery involves reverting to development programming as soon as possible with a focus on building local capacities and benefitting the local economy. The main areas that warrant continued attention are developing transition plans and becoming more systematic at identifying potential and actual negative effects.

5.4 Performance of group members on Gender and diversity

AAG group members have a strong focus on promoting women's role in crises and group members perform strongly at ensuring inclusive representation of diverse groups and paying attention to their feedback on the quality and effectiveness of assistance. The *Emergency Preparedness and Response Handbook*, AAI's key resource in guiding members on responding to emergencies is in the process of being updated to better reflect AAI's commitments of on feminist leadership, young people, resilience and inclusion (gender, age and disability). AAG member staff articulate a deep-rooted commitment to women's participation and leadership and demonstrate the sensitivities, skills and capacities to deliver gender sensitive and inclusive programming.

5.5 Group members performance against each CHS Commitment

Commitment	Strong points and areas for improvement	Feedback from communities	Average score*
Commitment 1: Humanitarian assistance is appropriate and relevant	AAG members continue to perform well against this commitment. They remain actively committed to diversity and inclusion and apply an intersectional feminist approach, with emphasis on those who are most at risk of exclusion. AAG members continue to apply a range of approaches to assessing needs and are responsive to changing needs, capacities and context. While there is clear evidence of a focus on women and girls and on other potentially vulnerable groups, members do not systematically record fully disaggregated data. Routine context and stakeholder analysis on an ongoing basis is not yet systematic.	Communities report inclusive engagement with project assessment activities and the transparent targeting and identification of project participants based on agreed priorities, needs and capacities.	2.5
Commitment 2: Humanitarian response is effective and timely	AAG members perform well against this commitment. They have improved at systematically designing programmes that take constraints into account and their approach, systems, and procedures encourage timeliness. They advocate for unmet needs and capacitate communities to do the same. Group members have improved at planning and assessing programmes with reference to appropriate technical standards. Outcomes (and associated indicators) are frequently not sufficiently high level, but members do address poor performance when identified.	Communities report that they feel safe and comfortable when accessing services provided by AAG group members and that assistance is delivered timely.	2.7
Commitment 3: Humanitarian response strengthens local capacities and avoids negative effects	AAG members continue to perform well against this commitment. Their strategic focus on capacitating vulnerable groups to respond to crises strengthens resilience. Although AAG members focus on supporting local economies and reverting to development programming as soon as possible they do not systematically develop transition plans to describe how this happens. Members have a strong focus on preventing negative effects related to SEAH but do not systematically identify potential or actual negative effects related to other aspects of programming.	Communities report that the services provided by AAG members supports their resilience and builds on local capacities and they reported no negative effects of programming.	2.5
Commitment 4: Humanitarian response is based on communication, participation and feedback	AAG members continue to perform well against this commitment. They promote information sharing and meaningful participation. Project staff communicate with communities in the national and local languages through a variety of appropriate media. AAG members ensure that programme committees are diverse ensure representation from across the community. They encourage communities to provide feedback through a variety of methods and pay attention to diverse groups' input.	Community members state that AAG members describe expected behaviours of staff, as well as information such as programmes and deliverables. AAG members communicate appropriately with them and are in regular contact with them including throughout the pandemic. Communities also report that they meaningfully participate in programming from design through evaluation.	3.0
Commitment 5: Complaints are	AAG members continue to show evidence of commitment to welcoming and addressing complaints. In particular AAG members, as part	Communities confirm they have received information and are informed about the	0

<p>welcomed and addressed</p>	<p>of a federation-wide initiative, have invested greater resources into the ongoing rollout of new SHEA and safeguarding policies with related guidance for complaint handling, and assuring awareness at all levels – staff, partner and communities. However, complaint handling mechanisms are not routinely and formally documented or administered in line with relevant policy guidance. While AAG members often include community representatives in the administration of complaint handling processes there is limited evidence of community consultation, particularly in relation to the design and monitoring of CHMs.</p> <p>Notwithstanding AAG members improvements in relation to PSHEA and safeguarding at a policy level and indications of improved awareness of expected behaviour of staff at community level, findings indicate a systemic weakness with regard to documented and formal procedures for complaint handling. A number of related weaknesses described in this report were identified at the Initial Audit and AAG has not undertaken sufficient steps to close these gaps. AAG members have not demonstrated that they systematically meet the requirements of this commitment, so it has been awarded a Major Weakness.</p>	<p>CoC and expected behaviours of staff and are aware of their right to report any abuse or violation.</p>	
<p>Commitment 6: Humanitarian response is coordinated and complementary</p>	<p>AAG members and their partners complement the work of national and local authorities, and other actors by directly participating in coordination forums, and collaborating with other actors and community stakeholders in the design and implementation of projects. They take leadership of specific sectoral response areas (in alignment with the AA humanitarian signature) and sign agreements with stakeholders based on thematic interventions, as identified in coordination meetings. AAG members participate in joint needs assessments, information dissemination activities and joint fundraising efforts (at coordination fora).</p> <p>Partners' constraints are informally addressed during monitoring visits, and they are empowered to attend and contribute to coordination meetings. Documentation of partner constraints, capacity assessments and capacity building processes is not always complete.</p>	<p>Communities generally report good collaboration between AAG members, partners, government authorities and other organisations during service delivery. They report that partners adequately represent AAG members.</p>	<p>2.3</p>
<p>Commitment 7: Humanitarian actors continuously learn and improve</p>	<p>AAG members and partners conduct Participatory Review and Reflection Processes (PRRPs), periodic monitoring visits (monthly and quarterly), annual learning reviews, meetings and workshops with communities, partners, and stakeholders to learn from, and share good practices and solutions with them. Information collected is used to inform proposal development, planning and budgeting processes.</p> <p>AAG members' and partner staff participate in interagency coordination bodies, where they</p>	<p>Communities appreciate PRRP sessions and trainings they receive from AAG members and partners. They share from their experiences and receive lessons learnt from AA implementing elsewhere.</p>	<p>2.3</p>

	<p>share learning and inform broader humanitarian responses. AAG members share learning with communities and partners through regular engagement. Dissemination of, and access to, learning documentation can be inconsistent (within and across AAG members).</p> <p>AAG members do not however, systematically document and monitor feedback from complaints to inform learning and implement changes in project design.</p>		
<p>Commitment 8: Staff are supported to do their job effectively, and are treated fairly and equitably</p>	<p>AAG members conform to AAI's global HR standards and adopt and contextualise these into country specific HR policies. HR policies are shared with staff during induction and policy updates are shared with staff via email, weekly staff meetings and deposited on SharePoint or BambooHR for staff to access them.</p> <p>Since the IA, AAI has taken significant steps in relation to the security and well-being of staff through the rollout of a number of new policies and guidelines and staff generally confirm their knowledge of relevant policies and procedures.</p> <p>AAG members have staff numbers that are appropriate to their programme and technical requirements. Staff are aware of options for seeking technical support from other members however, this is not routinely utilised by AAG members.</p> <p>Partners report that AAG members conduct partner assessments to identify capacity and policy gaps, and partner compliance with local employment law. AAG members support partners to develop new, update or adopt (from AA) key staff policies. They provide partners with capacity building to meet their obligations and requirements outlined in partner agreements.</p>	<p>Communities reported that AAG member staff are competent and effective in their work. They appreciate their professionalism and conduct. They perceive staff to have zero tolerance for corruption; to be impartial; and to be supportive of women's leadership.</p>	2.3
<p>Commitment 9: Resources are managed and used responsibly for their intended purpose</p>	<p>The IA found that AAI's policy base covered all aspects of resource management with the exception of the environment. Since the IA, AAI has developed an Environmental Policy to facilitate the institutionalisation and prioritisation of environmental sustainability across the federation at different levels in order to mainstream environmental considerations throughout organisational behaviour and operations. The policy is supported by an Environmental Guidance document to support members to minimise negative impact on the environment and improve sustainability. The guidance will be launched in 2022 and has not yet been disseminated for use in practice to members. Aside from the environment, AAG members continue to have policies and procedures in place for the responsible management of resources.</p>	<p>Communities confirm their awareness of AAG member's policies and zero tolerance of fraud and corruption and consider that AAG members are timely in the delivery of project resources.</p>	2.5

* *Note: Average scores are a sum of the scores per commitment divided by the number of indicators in each Commitment, except when one of the indicators of a commitment scores 0 or if several scores 1 on the indicators of a Commitment lead to the issuance of a major non-conformity/ weakness at the level of the Commitment. In these two cases the overall score for the Commitment is 0.*

6. Summary of weaknesses

Weaknesses	Type	Recommended resolution due date	Date closed out/Status
Group Level			
M2021 – G14: AAG has not defined its own approach to audit in order to meet its obligations and has not yet described how it intends to audit group requirements.	Major	2023-12-01	New
2021 – G15: As no audits have taken place as yet it is not possible to issue CARs.	Minor	2023-12-01	New
2021 – G17: AAG has not defined the nature or frequency of audits for its own purposes.	Minor	2023-12-01	New
2021 – G18: AAG does not have sufficient resources attributed to monitoring and auditing.	Minor	2023-12-01	New
2021 – G19: The independence and impartiality of monitoring and audit functions cannot be defined until AAG defines its audit approach.	Minor	2023-12-01	New
2021 – G20: AAG has not yet defined the extent to which communities and people affected by crisis input to its monitoring and audit processes.	Minor	2023-12-01	New
2021 – G23: Due diligence processes for new members to check, at a minimum, the organisational capacity to implement the CHS are not effectively in place.	Minor	2023-12-01	New
Total Number	1 Major 6 Minor		
Standard Commitments Level			
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	2021/12/01
2018-3.6: ActionAid Group members do not systematically identify the full range of potential or actual unintended negative effects.	Minor	2023-12-01	Extended
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	2021/12/01
M2021-C5: ActionAid Group members do not ensure complaints are welcomed and addressed.	Major	2023-12-01	New
2018-5.1 ActionAid Group members do not systematically consult communities on the design, implementation and monitoring of complaints handling processes.	Minor	2023-12-01	Extended
2021-5.2: AAG members do not systematically inform communities of the scope of complaints to be addressed by complaint mechanisms.	Minor	2023-12-01	New
2018-5.3: There is generally limited awareness on the process for escalating complaints from communities to	Minor	2021-05-20	2021/12/01


partners, partners to ActionAid Group members and ActionAid Group members who are operational to relevant members of AAI who support those programmes.			
2021-5.3: AAG members do not have effective processes in place to ensure the management of complaints in a timely, fair and appropriate manner that prioritises the safety of the complainant at all stages	Minor	2023-12-01	New
2021-5.4: ActionAid Group members do not have formally documented and locally contextualised complaint handling processes systematically in place that cover programming, sexual exploitation and other abuses of power.	Minor	2023-12-01	New
2021-5.7: AAG members do not have formal procedures or guidance to refer complaints on a routine basis, in line with good practice.	Minor	2023-12-01	New
2018- 8.2: ActionAid Group members do not systematically ensure that staff fully understand policies that are relevant to them.	Minor	2021-05-20	2021/12/01
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	2021/12/01
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	2021/12/01
Total Number	1 Major at commitment level 6 Minor		

7. Sampling recommendation for next audit

Sampling rate	As per HQAI guidelines for sampling.
Specific recommendation for selection of sites	<p>The selection of sites for the next audit should consider, in particular:</p> <ul style="list-style-type: none"> • Group level progress on auditing and quality assurance. • Progress on the rollout of the PSHEA, safeguarding and CS policies and associated complaint handling mechanisms at AAG member level (documented and contextualised). • Progress on the rollout of the new environment policy and associated guidance at AAG member level. • Progress towards greater consideration of the full range unintended negative effects at programme level.

8. Lead auditor recommendation

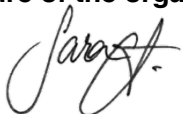
In our opinion, ActionAid Group continues to demonstrate a high level of commitment to the Core Humanitarian Standard on Quality and Accountability and its inclusion in the Independent Verification scheme is justified.

Name and signature of lead auditor:  Joanne O'Flanagan	Date and place: 1st December 2021 - Belfast
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9. HQAI decision

Registration in the Independent Verification Scheme:			
<input checked="" type="checkbox"/> Maintained <input type="checkbox"/> Suspended	<input type="checkbox"/> Reinstated <input type="checkbox"/> Withdrawn		
Next audit: Surveillance audit January 2024			
Name and signature of HQAI Executive Director:  Pierre Hauselmann		Date and place: 13 January 2022, Châtelaïne,	

10. Acknowledgement of the report by the organisation

Space reserved for the organisation	
Any reservations regarding the audit findings and/or any remarks regarding the behaviour of the HQAI audit team: <i>If yes, please give details:</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Acknowledgement and Acceptance of Findings: I acknowledge and understand the findings of the audit I accept the findings of the audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Name and signature of the organisation's representative: Sara Almer 	Date and place: 31/01/2022 UK

Appeal

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

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

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

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

Annex 1: Explanation of the scoring scale*

Scores	Meaning: for all verification scheme options	Technical meaning for all independent verification and certification audits
0	Your organisation does not work towards applying the CHS commitment.	<p>Score 0: indicates a weakness that is so significant that the organisation is unable to meet the commitment. This leads to:</p> <ul style="list-style-type: none"> • Independent verification: major weakness; • Certification: major non-conformity, leading to a major corrective action request (CAR) – No certificate can be issue or immediate suspension of certificate.
	Your organisation is making efforts towards applying this requirement, but these are not systematic.	<p>Score 1: indicates a weakness that does not immediately compromise the integrity of the commitment but requires to be corrected to ensure the organisation can continuously deliver against it. This leads to:</p> <ul style="list-style-type: none"> • Independent verification: minor weakness • Certification: minor non-conformity, leading to a minor corrective action request (CAR).
2	Your organisation is making systematic efforts towards applying this requirement, but certain key points are still not addressed.	<p>Score 2: indicates an issue that deserves attention but does not currently compromise the conformity with the requirement. This leads to:</p> <ul style="list-style-type: none"> • Independent verification and certification: observation.
3	Your organisation conforms to this requirement, and organisational systems ensure that it is met throughout the organisation and over time – the requirement is fulfilled.	<p>Score 3: indicates full conformity with the requirement. This leads to:</p> <ul style="list-style-type: none"> • Independent verification and certification: conformity.
4	Your organisation's work goes beyond the intent of this requirement and demonstrates innovation. It is applied in an exemplary way across the organisation and organisational systems ensure high quality is maintained across the organisation and over time.	<p>Score 4: indicates an exemplary performance in the application of the requirement.</p>

* Scoring Scale from the CHSA Verification Scheme 2020