

# Concern Worldwide Recertification Audit – Summary Report CWW 2022/04/01

This is the Stage One Report of the Recertification Audit. It includes the findings from the first phase of the audit process, which scope covers at a minimum the open non-conformities (CARs). If no major non-conformity is identified at Stage One, the HQAI certificate can be renewed.

Stage Two of the Recertification Audit will include site visits, which can include Head Office and a sample of country programmes. Upon completion of Stage Two, a final audit report will present the complete findings of the audit and final conclusions on the performance of the organisation against all commitments of the CHS.

If major non-conformities are identified at Stage 2 of the audit process, the certificate will be suspended, possibly withdrawn following HQAI established procedure (PRO116 – Issuance, suspension, reinstatement and withdrawal of certificates).



### 1. General information

1.1 Organisation

Туре	Mandates Verified			k
<ul> <li>✓ International</li> <li>✓ National</li> <li>✓ Membership/Network</li> <li>✓ Direct Assistance</li> <li>✓ Federated</li> <li>✓ With partners</li> </ul>	<ul> <li>☐ Humanitarian</li> <li>☐ Development</li> <li>☐ Advocacy</li> <li>☐ Humanitarian</li> <li>☐ Development</li> <li>☐ Advo</li> </ul>		anitarian elopment ocacy	
Head office location	Dublin, Ireland			
Total number of country programmes	24	Total number of staff		4,589

#### 1.2 Audit team

Lead auditor	Daniel Rogers
Second auditor	Claire Goudsmit
Third auditor	
Observer	
Expert	
Witness / other	

### 1.3 Scope of the audit

CHS Verification Scheme	Certification Scheme
Audit cycle	Second
Phase of the audit	Recertification
Extraordinary or other type of audit	

### 1.4 Interviews conducted during Stage 1

Position / level of interviewees	Number	Onsite or	
	Female	Male	remote
Head Office			
Management	11	4	Remote
Staff (e.g., advisors)	2	2	Remote
Concern USA Office			
Management		1	Remote
Concern UK Office			
Management	1	1	Remote
Total number of interviewees	14	8	

### 1.5 Opening meeting

Date	2022/01/17
Location	Remote
Number of participants	9 (7 female, 2 male)



Any	substantive	issues
arisi	ng	

none

### 2. Background information on the organisation

### 2.1 General information

Concern Worldwide is a non-government, international, aid organisation. Concern was founded in 1968 and is dedicated to the reduction of suffering and working towards the ultimate elimination of extreme poverty in the world's poorest countries. Concern has its head office in Dublin, Ireland. Concern has operations in the UK including Northern Ireland, the United States and South Korea. UK, US and South Korea operations do not run their own programmes which are all centrally managed by the Irish office. A single global strategy and advocacy strategy guide the work of all parts of the organisation.

Concern currently manages 24 country programmes delivering humanitarian and development programmes across a range of sectors organised into four areas: emergency, livelihoods, health, education. Concern's approaches include: partnerships, equality, Disaster Risk Reduction (DRR), community resilience, HIV, protection and safeguarding, environmental sustainability, conflict sensitivity and mitigation and urban programming. Concern works increasingly in emergency and fragile and conflict affected contexts, as well as delivering long term development programming in more stable contexts.

Concern's Mission is to help people living in extreme poverty achieve major improvements in their lives, which last and spread without ongoing support from Concern. In 2020 Concern had a total expenditure of EURO 190m.

## 2.2 Governance and management structure

Concern has finalised a new Strategic Plan 2021-2025 which maintains its focus of 'reaching the furthest behind' and 'doing more and doing it better'. The plan outlines the direction of the organisation and states that Concern aims to be a 'professional, responsive organisation that is accountable and focused on what matters.' Based on broad consultation across the organisation seven strategic objectives aimed at enabling Concern to be a safe organisation, delivering safe programmes and being accountable to programme participants. A personcentred approach, Accountability to Affected Populations (AAP) and the CHS are embedded commitments, along with key areas of listening, preventing, reporting, responding and learning.

In 2021 Concern conducted a comprehensive Safeguarding Review which recommended the establishment of a new Protection and Safeguarding Unit (PSU). The PSU, led by a Director of Protection and Safeguarding, has been established and the team is further resourced with a Safeguarding Adviser and a Humanitarian Protection Adviser, with one additional team member joining in January 2022. The Protection and Safeguarding Framework was finalised in March 2021. Concern continues to build the capacity of Safeguarding Focal Points in each Country Office, and in some cases at the field office level also.

# 2.3 Internal quality assurance mechanisms and risk management

Concern has an organisational risk register which is reviewed by the Audit and Risk Committee of the Board every 6 months. Concern also has an organisation wide compliance strategy. Every country programme maintains a risk register, which is compiled and reviewed at HO level, and every year HO holds an organisational risk workshop to identify top risks and mitigation strategies. Concern's Internal Audit function conducts country visits on a risk basis after analysis of country risk registers among other considerations. Depending on the size and nature of their operations, some countries have compliance officers and internal auditors. The compliance strategy proposes increased field-based compliance staff, and several new posts were created in 2021.

A new risk-based partnership process including a new due diligence procedure for partners was established in 2021.

Since 2020 Concern have rolled out the use of an online Grants Management System (GMS) which is used by management to track grant management and processes. As part of the ongoing development of the GMS, it will be linked to Concern's finance system. GMS also allows Concern offices to share funding opportunities, and to work jointly on proposals,



allowing for technical advisors to input into the conceptualisation and design of new interventions. Functions of GMS include tracking of comments, checklists for proposal development, review and approval. Information is searchable by thematic sector, donor and country and the system allows for south-to-south sharing and learning. Basic functionality has been achieved in early 2022 with the addition of more functions, data quality and further training all underway.

Several policies have been updated or created since the last audit and approved by the Senior Management Team (SMT) including Conflict of Interest Policy, Anti-Fraud Policy, Crisis Management Plan, CCTV Policy, Governance Code, Vaccine Policy, Code of Conduct and Associated Policies, Revisions to Authority Levels 2021, Risk Management Policy and Investigations Manual.

Country Annual Programme Progress (APPR) reporting process has been established to systematically monitor and quality assure programming from the HO level. The APPRs cover security management and protection, safeguarding, reporting unintended consequences of Concern's interventions, CRMs and elements of the CHS are included: Annex 5a on Accountability and the CHS improvement plans from country programmes and Annex 11 on Partnership Overview, asks about improvements or inputs on safeguarding and CRM, protection, CHS. While the APPR has been in place for a number of years, the template is updated annually, and a number of revisions have been made in relation to Concern's CHS commitments.

## 2.4 Work with partner organisations

Concern's global Strategic Plan (2021-2025) includes partnership, (with key donors, national and international NGO's, local institutions, public supporters) as a core value and commitment of the organisation to achieve its aims. Whilst Concern has significant experience of partnership with others to implement its programme work, e.g., local government, local and national non-governmental organisations (L/NNGOs), the organisation has recognised a decrease in the amount of programming it has implemented with local and national non-governmental organisations (L/NNGOs) over the previous 2 strategic planning cycles (24% of programme budgets in 2012 down to 11% in 2020). An analysis of the factors that have contributed to this, e.g.: working more in rural and remote areas with weaker civil society infrastructures and fragile contexts; limited or weak partner selections causing weak programme quality and accountability to communities, and how Concern has learned from these to increase its partnerships with LNGOs, are outlined in the drafted Local and National Partnerships Strategy (2021-2025).

Concern is refocusing its efforts to increase local partnerships and aims to deliver 25% of its programmes through NNGOs by 2025. A Partnership Advisor is in place and is working closely with country teams to develop local partnership strategies, build Concern's ways of working with LNGO to create strong partnerships. Concern is establishing a robust framework for working in partnership with local organisations: Partner Due Diligence Procedures (2021) for any organisation or entity where Concern awards funding), Partnership Policy and Guidelines (2020) (which includes Concern's Localisation Strategy) and Concern's Integrated Local Partner Assessment tool (CILPAT) (including partnership mapping and review guidance; and Capacity Building Plan and MOU templates), and with associated trainings and direct support to partners. The CHS, and specifically COC, Protection and Safeguarding elements are all included.



### 3. Summary of non-conformities

Note: this summary is based on the Stage 1 assessment results only and forms the basis for the Stage 2 assessment. The conclusions can potentially change after onsite visits are conducted, as a result of new evidence identified.

Corrective Action Requests (CARs)	Туре	Resolution due date	Date closed out
2019-4.1: Concern and partners do not systematically share information about the principles they adhere to and about expected behaviour of staff.	Minor	2021-11-20	2022-02-28
2019-5.2: Concern does not ensure that the full scope of complaint response mechanisms is communicated to communities.	Minor	2021-11-20	2022-02-28
2019-5.3: Concern's complaint response mechanisms do not provide for timely and appropriate complaints handling that prioritises the safety of the complainant and those affected at all stages.	Minor	2021-11-20	2022-02-28
2019- 5.6: Concern does not assure that communities are made fully aware of the expected behaviour of staff and partner staff, including commitments on the prevention of sexual exploitation and abuse.	Minor	2021-11-20	2022-02-28
Total Number	0		

### 4. Stage 2 recommendation

Stage 2 is recommended	⊠ Yes □ No
Explanation / pre-conditions	The auditors find significant action has been demonstrated at the HO level and from documentary review to give an adequate level of assurance that no major CAR exists nor is likely to arise at Stage 2 of the audit.
Recommended timeframe for Stage 2	Programme visit and remote country assessments to be conducted before May 30th 2022. The final report will be issued by end of June 2022 with final conclusions on the compliance of the organisation.

### 4.1 Sampling\* recommendation for Stage 2

Randomly sampled country programme sites	Included in final sample	Replaced by	Rationale for sampling and selection of sites	Onsite or remote
Chad	yes		Represents a medium-sized programme budget with a range of direct and partnership programme approach, not included in previous audits.	Remote assessment

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Lebanon	no	Turkey	Lebanon was visited onsite for 2019 MTA. Turkey was assessed as part of the 2020 MA. Turkey was purposively selected for the onsite visit largely based on feasibility of travel (e.g., Covid travel restrictions, insecurity) also because it represents a relatively large programme budget, with a significant number of Concern staff in-country, development, humanitarian – health, education, and protection programming.	Onsite visit
Malawi	yes		Medium-sized programme budget and has emphasis on Concern's development work.	Remote assessment
Burkina Faso	no	Democratic Republic of Congo (DRC)	Burkina Faso is a very small-scale project and insufficient for assessment. Replaced with DRC from the random sampling list. Represents a large-scale established Concern programme with high number of staff in-country, humanitarian and development projects and a significantly high budget working predominately directly, with 1 NNGO and 1 INGO partners.	Remote assessment
Sierra Leone	yes		Represents a medium-sized humanitarian and development programme office and projects delivered directly and through NNGOs and INGOs. Not included in any previous audits.	Remote site visit
Kenya	no		Remotely assessed for 2020 MA2	

Any other sampling performed for this audit:

The sampling included selecting a programme with a L/NNGO partner, as was recommended in the MTA. The UK Concern Office and Concern USA were also involved in the HO interviews as they relate to the implementation of CWW's international programme work.

#### Sampling risk:

Due to worldwide Covid-related travel restrictions the sampling rate was reduced from 2 onsite visits to one onsite and one remote site visit to CWWs country programmes instead. Whilst inside HQAI's rules for sampling and alongside normal criteria, Turkey was purposively selected for the onsite visit based on accessibility of the country, allowable travel regulations and Covid management in-country. The Sierra Leone programme was randomly selected for the remote site visit based on normal sampling criteria and projects were selected largely based on the feasibility to connect (either through mobile or internet networks) with programme participants and stakeholders.

To address the reduced number of onsite visits for this audit it is recommended that the next onsite audit includes a minimum of two full country programme visits.

\*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.

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### 5. Lead auditor recommendation

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### 6. HQAI approval of report and validation for Stage 2

Report approved	☐ No ⊠ Yes		
Stage 2 approved	☐ No ⊠ Yes		
Sampling recommendation approved	□ No Yes		
Name and signature of HQAI Ex	ecutive Director:	Date and place: 01-04-2022, Châtelaine	
Pierre Hauselmann			

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### 7. 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:	☐ Yes ☐ No		
If yes, please give details:			
Acknowledgement and Acceptance of Findings: I acknowledge and understand the findings of the audit			
I accept the findings of the audit	☐ Yes ☐ No		
	☐ Yes ☐ No		
Name and signature of the organisation's representative:	Date and place:		
Allfelly coo Concers worldwide	11 April 2022		

### **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.	Score 0: indicates a weakness that is so significant that the organisation is unable to meet the commitment. This leads to:  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.
1	Your organisation is making efforts towards applying this requirement, but these are not systematic.	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:  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.	Score 2: indicates an issue that deserves attention but does not currently compromise the conformity with the requirement. This leads to:  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.	Score 3: indicates full conformity with the requirement. This leads to:  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.	Score 4: indicates an exemplary performance in the application of the requirement.

<sup>\*</sup> Scoring Scale from the CHSA Verification Scheme 2020

