

# Developmental Action Without Borders / Naba'a

## Recertification Audit – Summary Report 2020/07/23

### 1. General information

#### 1.1 Organisation

Type	Mandates	Verified mandates	
<input checked="" type="checkbox"/> National <input type="checkbox"/> Membership/Network <input checked="" type="checkbox"/> Direct Assistance <input type="checkbox"/> International <input type="checkbox"/> Federated <input 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 checked="" type="checkbox"/> Development <input checked="" type="checkbox"/> Advocacy	
<b>Head office location</b>	Saida, Lebanon		
<b>Total number of programmes</b>	15	<b>Total number of staff</b>	119

#### Audit team

<b>Lead auditor</b>	Marie Grasmuck
<b>Second auditor</b>	-
<b>Third auditor</b>	-
<b>Observer</b>	-
<b>Expert</b>	-
<b>Other</b>	-

#### 1.2 Cycle phase

Audit Stage	CHS Verification Scheme			
	Certification	Independent Verification	Benchmarking	Other
Initial audit (IA)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
First maintenance audit (MA1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mid-term audit (MTA)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Second maintenance audit (MA2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Recertification audit (RA)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Extraordinary audit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Short notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other ( <i>specify</i> )	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 1.3 Sampling

Sampled projects	Included in final sample	Replaced by	Rationale / Comments	Selected for onsite visit or remote assessment
Contribute to enhance socio-economic skills, empowerment and promote participation of marginalized youth	Yes	NA	This project focuses on children and youth, in the South, in the livelihoods sector. Coupled with the other projects, it represents Naba'a's project diversity	remote
Increase access to basic services and meeting basic and	Yes	NA	This project focuses on elderly and social cohesion in various areas in Lebanon. Coupled with the other	remote

specific needs for the most vulnerable PRS and PRL elderly people			projects, it represents Naba'a's project diversity	
Regional SIDA Framework - Manara project	Yes	NA	This is a project part of a regional framework, focused on children's right and advocacy. Coupled with the other projects, it represents Naba'a's project diversity	remote
TDH BMZ Children protection in Tyre and North	Yes	NA	This project focuses only on children, in the North and Tyre area, in the protection sector. Coupled with the other projects, it represents Naba'a's project diversity	remote

#### Add any other sampling performed for this audit:

Due to the Covid-19 pandemic and associated travel restrictions during the course of the audit, all activities have been conducted remotely, using remote communication technologies. Staff were selected from the different areas where Naba'a works.

Community members were selected directly by Naba'a, amongst communities who were involved in sampled projects. Out of 12 Community members selected for phone interviews, 7 were available and effectively interviewed for the present audit.

We have taken into account all the available evidence presented to us during the audit and have used the information provided by the 4 previous audit reports. Naba'a has demonstrated continuous improvement over its first cycle of certification. Despite the limitations inherent to the exclusive use of remote auditing methodologies for the present process, we believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusions and recommendation.

We have recommended additional mitigation measures that should be taken in the next audits, such as the inclusion of a visit at the next surveillance audit. See section 6 for recommendations on sampling and onsite visit at the next audits.

*\*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 assessed	Dates	Onsite or remote
Head office, Saida	11 and 12/02/2020 22 and 23/04/2020	All remote auditing (see section 1.3 on Sampling above)
Naba'a centers, North	11 and 12/02/2020 22 and 23/04/2020	
Naba'a centres, Saida area	11 and 12/02/2020 11 and 12/05/2020	
Naba'a centres, Tyre area	11 and 12/02/2020 22 and 23/04/2020 11 and 12/05/2020	
Naba'a projects, North	11 and 12/02/2020	
Naba'a projects, Nabatieh	11 and 12/02/2020	
Naba'a projects, Ein El Helweh camp	11 and 12/02/2020 22 and 23/04/2020 11 and 12/05/2020	
Naba'a projects, Tyre	11 and 12/02/2020 22 and 23/04/2020	

11 and 12/05/2020

## 2.2 Interviews

Position / level of interviewees	Number of interviewees (female / male)	Onsite or remote
<b>Head Office</b>		
Management	10 (5/5)	Remote
Staff	12 (8/3)	Remote
<b>Country Programme(s)</b>		
Management	NA	NA
Staff	NA	NA
Partner staff	NA	NA
Others (specify)	NA	NA
<b>Total number of interviews</b>	<b>22 (13/8)</b>	

## 2.3 Consultations with communities

Type of group	Number of participants	
	Female	Male
Individual interview - elderly	0	1
Individual interview – elderly	1	0
Individual interview – youth	0	1
Individual interview – youth	1	0
Individual interview - boy	0	1
Individual interview – youth	2	0
<b>Total number of participants</b>	<b>4</b>	<b>3</b>

## 2.4 Opening meeting

<b>Date</b>	2020/02/11
<b>Location</b>	Remote
<b>Number of participants</b>	10
<b>Any substantive issues arising</b>	No

## 2.5 Closing meeting

<b>Date</b>	2020/06/16
<b>Location</b>	Remote
<b>Number of participants</b>	4
<b>Any substantive issues arising</b>	The auditor recognised that, due to the exclusive use of remote auditing techniques, there are limitations in terms of gathering information on site on how Naba'a works with communities, especially outside of Naba'a centres. See section above on Sampling and section 6 below for mitigation measures.

## 3. Background information on the organisation

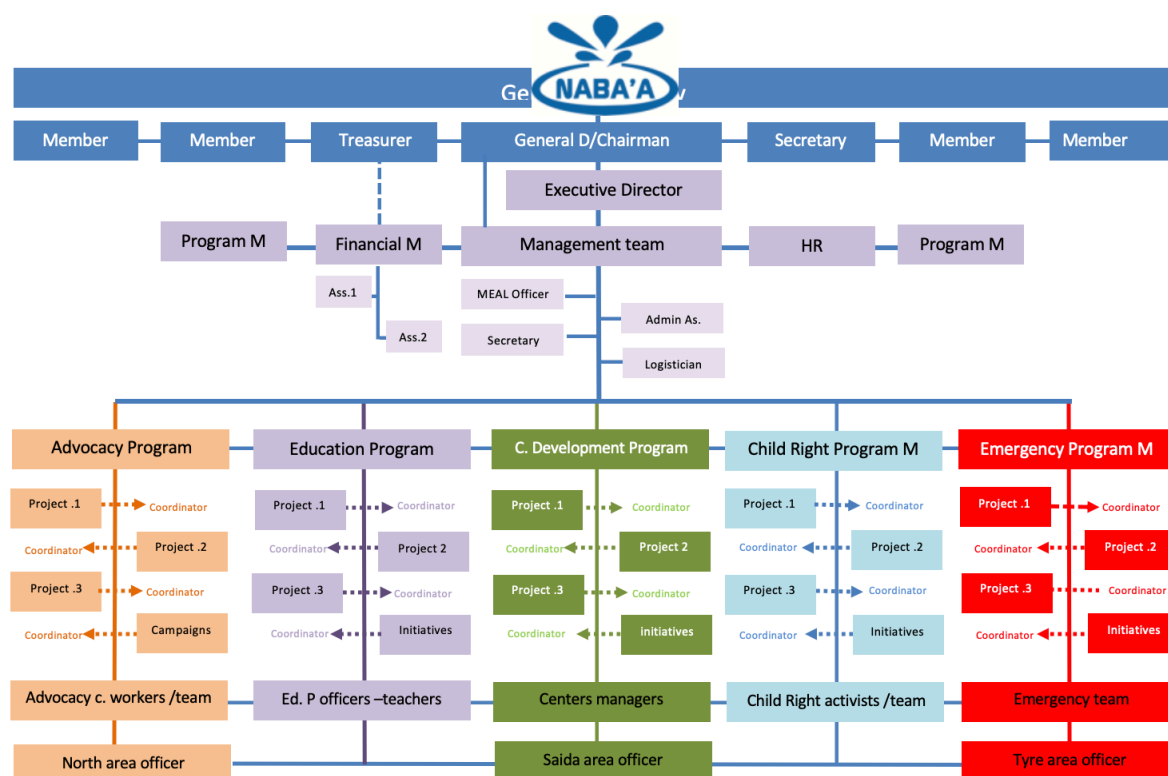
**Governance and management structure**

Naba’a is an a-political, non-profit Lebanese organisation, which works with Palestinian, Lebanese and Syrian communities. Naba’a has been registered as a Lebanese NGO since 2001.

Naba’a’s Board of Directors (BoD) maintains oversight of the operations with the Senior Management Team (SMT), which ensure management and programme delivery. The communication between the BoD and the SMT is at a minimum on a monthly basis, but heightens in case of a crisis, such as the December 2019 crisis in Lebanon (economic and financial crisis, demonstrations) or when an important decision has to be taken regarding Naba’a’s strategy or its funding. Naba’a has a horizontal management system that allows for equal inputs from the members of the management team, and staff interviewed stated that their inputs were regularly sought and taken into account by their managers, creating a welcoming atmosphere to expressing challenges.

In the last year, Naba’a has progressively shifted how it prioritises and organises the achievement of its strategy: previously focused on its strategic aims (the planned outcomes in the 2017-2020 strategy), Naba’a now focuses on its sectoral areas of work (as laid out in its strategic framework).

Naba’a’s current strategy is coming to an end at the middle of 2020 and the organisation is currently implementing needs assessments in the communities it works with and it will build its next strategy based on the outcomes of these assessments.



**Description of the internal quality assurance systems**

Naba’a’s initial HQAI audit against the CHS happened in 2015 and its certification was maintained through the 4-year audit cycle. Naba’a had three minor CARs to address since the MA2 (2019), one (2018 – 5.6) was related to the information of communities about staff behaviour, and Naba’a decided to integrate the required awareness session into its participative activities. Two CARs were related to the environment requirements in the CHS (2019 – 3.6 and 2019 – 9.4) and Naba’a regarded this as an opportunity to better develop its own awareness and new activities with the communities in this area of work.

Naba’a has finalised an internal audit toolkit in late 2019, which consists of four components:

- Monitoring and evaluation of projects in the field: the M&E framework is a tool that enables output, outcome and impact monitoring, at both local and national level, and that enables aggregation between projects.

- Follow-up of community development committees: considered as the “incubators” of community participation and ownership, this component focuses on monitoring their development and their role.
- Follow-up of trainings and awareness sessions: a component that focuses on the quality of the sessions and on the competencies of the trainers.
- Awareness and knowledge of human resources: this component aims at ensuring that Naba’a’s team is knowledgeable about human rights, child rights, and its code of conduct, and the practical consequences of these documents.

Naba’a has planned to roll-out the internal audit tool to all its projects, but the implementation has been delayed due to the Covid-19 pandemic, during which several activities came to a halt, and the tool is not fully in place yet.

Naba’a also developed the community development committees, which are organised by geographical areas of operations and within these, by thematic sector. Naba’a’s intention in the medium term is that the community development committees be a participative and ownership anchor in the community, and that they play a role in the quality assurance system by providing feedback and participating in the different steps of the project.

However, the audit observed weaknesses in some quality assurance systems of Naba’a:

- The monitoring and evaluation activities are not consistently applied in all its projects;
- The document management system does not follow best practices;
- Naba’a’s Anti-Corruption and Risks Policy and the key processes used to identify suspected fraud or corruption cases are not known by its staff.

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#### **Work with partner organisations**

Naba’a works directly with communities and individuals and implements its activities directly. This has not changed since the last Maintenance Audit in 2019. Naba’a has developed working relationships with specialised UN agencies, such as UNRWA, and operational partnerships with vocational training providers.

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## 4. Overall performance of the organisation

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#### **Effectiveness of the management system and internal quality assurance and governance**

Naba’a’s main developments since the last audits are explained above.

Regarding the effectiveness of the management system and internal quality assurance and governance on addressing the CARs:

Minor CAR 2018 – 5.6, issued with a time for resolution for March 2020, was identified as a possible risk to the recertification audit (RA) since it had been regularly pointed out as an area that required attention over the last certification cycle. Naba’a has provided documented evidence that awareness activities had been organised on the expected behaviour of the staff and the principles the organisation adheres to. However, the community members interviewed for this audit were not consistently aware of those two points.

Taking into consideration the limitations above mentioned due to COVID 19 disruptions and the relatively low number of interviews with communities, the time for resolution of the Minor CAR is extended until the maintenance audit, in order to provide Naba’a with sufficient time to create consistent awareness amongst the communities and document the process of closure of this non-conformity.

The Covid-19 pandemic and the fact that Lebanon is going through a wave of demonstrations since December 2019, due to a social, economic and financial crisis is also taken into account in the decision to extend the minor CAR, as activities have been and can be further disrupted. A site-visit is recommended at the maintenance audit (see section 6), since this indicator requires extended community consultations.

Considering that this weakness was first identified at the IA (2016), there is a risk a Major CAR if it is not addressed timely. Naba’a will be expected to provide sufficient evidence of consistent actions to close this Minor CAR at the next Maintenance Audit (2021).

Minor CAR 2019 – 3.6, was issued at the mid-term audit with a time for resolution for March 2021. It was highlighted during stage 1 of the present recertification audit (RA) as another area of risk that required decisive and timely action by the organisation. While activities have

been implemented by Naba'a to address this CAR, there was no indication that the identification of potential negative effects of the activities on the environment was systematically considered in all programmes. At stage 2 of the RA, Naba'a did not provide further evidence of a consistent and fully functional process.

Naba'a will be expected to provide sufficient evidence by the initial time for resolution (at the next MA in 2021). The indicator bears a risk of being downgraded to a Major CAR if not addressed fully.

### Performance in the application of the CHS

Naba'a's good performance in the areas of context analysis, programme design, localization, and external coordination was maintained since the IA. Naba'a's long term presence in the community, willingness to engage in participative action and strong commitment to impartiality has been noted throughout the audit, as well as the active role they are playing in Lebanon with regards to the advocacy for Children's right.

It is also noteworthy that all staff interviewed expressed pride in working with Naba'a, and that Naba'a is considered a very supportive structure, that helps them develop both soft and hard skills. Naba'a's work in favour of localisation and resilience has also been highlighted as a strong point, as some of Naba'a's activities are directly focused on improving the local economy, fostering social cohesion, preventing children dropping out of schools, and preventing the isolation of the elderly.

In general, the communities interviewed expressed great satisfaction with Naba'a's work and gratitude regarding their strong commitment with the communities over the long term.

Naba'a's performance has decreased in the areas of communicating information to the community, as the communities interviewed weren't consistently aware of the principles Naba'a adheres to, how it expects its staff to behave, and the existence of a complaint mechanism. It was also noted that the Anti-Corruption and Risk Policy is not consistently known by staff.

Overall and since the MTA in 2018, this audit records:

- One Minor CAR (2018 – 5.6); which time for resolution was extended;
- Two Minor CARs (2019 – 9.4 and 2019-4.1) have been closed;
- One Minor CAR (2019 – 3.6) remains with a time for resolution at March 2021;
- One observation that has been standing since the IA and has been downgraded to a Minor CAR (2020 - 5.1);
- Two observations have been sufficiently addressed;
- 18 new observations have been raised during the present audit.

### Performance on PSEA

Score: 2

Naba'a has systems in place that promote open communication, diversity and participation of vulnerable groups. Its main policies, such as the Child Protection Policy and the Code of Conduct commit to preventing its programmes having negative effects and to preventing SEA cases.

Naba'a trains its staff on the said policies and they are able to explain the contents of the policies and the consequences of not adhering to them. Naba'a has a complaint mechanism in place. However, most of the communities interviewed were unaware of the existence of a complaint mechanism nor of the expected behaviours of staff and the principles Naba'a adheres to, and couldn't recall being consulted on the design of the complaint mechanism.

### Performance on localisation

Score: 2,8

Naba'a is committed to localisation, through its policies, participatory processes, and its activities, some of them directly focusing on resilience, empowerment of the communities, and preserving the local economy.

The communities interviewed were very satisfied with Naba'a's approach and of their role in the community and of their relationship with other local stakeholders. Naba'a is engaged in coordination platforms at the local and national level, and when necessary, takes the lead in coordination in order to prevent gaps in response.

**Performance on gender and diversity**

Score: 2,7

Naba'a is committed to ensuring diversity in its activities, including in considering gender when dealing with communities. Naba'a's activities are participatory and the multiple information channels they have implemented (such as the community development committees) ensure that the voice of the different groups in the community are heard.

Naba'a's activities also represent their commitment to diversity, as they work with Lebanese, Palestinians, Syrians, children, youth and the elderly. The communities and staff interviewed confirmed that Naba'a is committed to diversity, provides impartial assistance, and considers gender issues in the design of its programme and staff management.

Naba'a's commitment to diversity is also exemplified through its staff, which is very diverse in terms of age, nationality, faith, community and gender.

## Organisational performance in the application of the CHS

Commitment	Strong points and areas for improvement	Feedback from communities	Performance
<b>Commitment 1:</b> Humanitarian assistance is appropriate and relevant	<p>Naba'a's policies and strategic documents commit to impartiality and staff interviewed shared several examples of how impartiality, neutrality and diversity constitute core values at Naba'a.</p> <p>Naba'a ensures objective and ongoing analysis of the context and risks through a diversity of channels: regular assessments, continuous and long-term presence in its area of operations (in the Naba'a centres), participation to the relevant coordination meeting and identification and coordination with other stakeholders. There are numerous examples of Naba'a adapting its programmes to changing needs, capacities and context.</p> <p>Naba'a's assessments and reports reflect that they collect disaggregated data; however, the collection of disaggregated data is not an explicit commitment in its policies.</p>	<p>The communities interviewed confirmed that they witnessed Naba'a being impartial, and that the organisation holds a good reputation when it comes to upholding principles of impartiality, neutrality and diversity.</p>	2.8
<b>Commitment 2:</b> Humanitarian response is effective and timely	<p>Naba'a policies commit to ensuring a systematic, objective and ongoing monitoring of activities and to use the result of those activities to adapt and improve programmes.</p> <p>Naba'a policies also commit to timely decision-making and, in times of emergency, Naba'a multiplies communication with the Board of Directors (BoD), so they follow the situation from the start and are able to anticipate emergency disbursements, as was the case for the Covid-19 pandemic response.</p> <p>Naba'a designs programmes that address the constraints of the communities, and delivers its programmes using relevant technical standards. Naba'a also has a comprehensive monitoring framework (the Global Impact Framework), that mixes qualitative and quantitative methodologies and analyses different levels of programme and organisational performance. However, these</p>	<p>The communities interviewed stated that Naba'a's response is both realistic and timely and most of them had taken part in a monitoring-like activity, such as participating to a focus group or answering a survey.</p>	2.7

	<p>monitoring processes are not implemented consistently throughout all its programmes.</p>		
<p><b>Commitment 3:</b> Humanitarian response strengthens local capacities and avoids negative effects</p>	<p>Naba'a policies and processes are designed to prevent programmes having negative effects, such as exploitation, abuse or discrimination by staff against communities and people affected by crisis, and to strengthen local capacities. For instance, Naba'a has a Child Protection Policy, a Code of Conduct, a Complaints Policy, and Security Guidelines that aim at preventing unintended negative effects. Naba'a also has an Anti-Corruption and Risks Policy; however, the staff is not aware of the existence or of the contents of this policy.</p> <p>Naba'a has processes in place to safeguard personal information collected from the communities, as laid out in the Policy on Information Sharing and Internal Instructions and as confirmed by staff; however, both policies are outdated and do not represent some of the best practices established in the sector.</p> <p>Naba'a is strongly committed to building on local capacities and on enabling the development of local leadership organisations, and it developed community development committees (CDC) in all its areas of operations. The CDCs aim at conveying the voice of the communities and are organised by sector (child protection, livelihoods, etc.). Naba'a also has several activities whose main objective is to foster local capacities and resilience (for instance, vocational training, schooling and social cohesion activities).</p> <p>Naba'a has several channels to identify and act upon unintended negative effects of its programmes, such as the involvement of the communities at each step of the project cycle, its knowledge of and coordination with stakeholders, regular monitoring visits from the programme and senior management team, a complaint mechanism, and a monitoring and evaluation framework that includes multiple types of activities. However, not all of Naba'a's processes and tools, such as the monitoring and evaluation activities, are consistently applied in all its projects.</p> <p>In terms of unintended negative effects regarding the environment, Naba'a has developed a policy document, training, and environmentally friendly activities, which all help mitigate potential unintended negative effects on the environment. However, those potential negative effects on the environment are not systematically considered in Naba'a's tools and processes and Minor CAR 2018-3.6 is maintained.</p>	<p>The communities interviewed saw a strong added value in the activities developed by Naba'a, including in the longer term around areas linked to resilience, such as fostering social cohesion in the neighbourhood or improving children and youth education. They considered Naba'a as a neutral stakeholder, that encourages local leadership.</p>	<p>2.6</p>



<p><b>Commitment 4:</b> Humanitarian response is based on communication, participation and feedback</p>	<p>Naba'a's policies commit to information sharing, as laid out in its Policy on Information Sharing, and in its participatory activities, such as the CDC, the participatory action research, or the orientation meetings at the beginning of the projects, the awareness-raising activities, and monitoring and evaluation activities.</p> <p>Naba'a communicates in languages, media and formats that are easily understood. Naba'a also works through local volunteers, who can further convey the messages in the different groups in the community.</p> <p>While Naba'a has implemented several activities to provide information to communities on the principles it adheres to, the expected behaviour of staff and the programme it is implementing, it didn't yet translate into a consistent awareness of those points at community level.</p>	<p>The communities interviewed were very satisfied regarding the opportunities given by Naba'a to share feedback. They explained feeling confident to share their opinion and that they view Naba'a as an organisation that communicates openly.</p> <p>The communities confirmed that Naba'a asked consent before taking pictures, even if they do not always know how the pictures are used.</p> <p>Not all the communities interviewed were aware of the principles Naba'a adheres to, how it expects its staff to behave and if or how the project would come to an end.</p>	2.7
<p><b>Commitment 5:</b> Complaints are welcomed and addressed</p>	<p>Naba'a's complaint handling process has been reviewed in order to improve the safety of the complainant and minimise conflicts of interest at the level of complaints handlers. However, although the staff interviewed was aware of the complaint mechanism, not all community members were aware of the existence of a complaint mechanism, and not all of them felt confident to raise a complaint. And although Naba'a's staff explain about the expected behaviour of humanitarian staff during orientation meeting and awareness sessions, many community members did not know about the organisational commitments of Naba'a or did not know what it meant.</p> <p>Complaints that do fall within the scope of the organisation are referred to a relevant party. Naba'a has no formal system to monitor the timeliness of the complaint handling process.</p>	<p>Most of the communities interviewed expressed gratitude over Naba'a's work and explained that they had no grounds on which to raise a complaint. The community did not recall being consulted on the design of the mechanism, and many of them weren't aware of the existence and scope of the complaint mechanism. Apart from the communities taking part in Naba'a's long-standing activities, many of the communities interviewed were not aware of Naba'a's organisational commitments made on PSEA and did not recall being explained about the expected behaviour of staff.</p>	2
<p><b>Commitment 6:</b> Humanitarian response is coordinated and complementary</p>	<p>Naba'a's policies and practices show commitment to coordination and collaboration with others. Naba'a's long term presence in its areas of operation and multiple channels of information foster the identification of the roles, responsibilities and capacities of different stakeholders.</p> <p>Naba'a is a regular participant in sectoral working groups or national or regional initiatives that are relevant to its mandate, such as the Lebanese Council of for Childhood or the Arab Network for Children's Rights.</p> <p>Naba'a also takes the lead in coordinating assistance when it is needed, in line with its overall criteria to implement emergency intervention (its capacity to fill a gap and the quality of the current intervention).</p>	<p>The communities interviewed confirmed that the assistance they received from Naba'a did not constitute a duplication of assistance, that the organisation was seen as an independent stakeholder, yet maintained dialog with the other stakeholders in the area.</p>	3

<p><b>Commitment 7:</b> Humanitarian actors continuously learn and improve</p>	<p>Naba'a's Global Impact Framework, Strategic Framework 2015-2020, monitoring and evaluation activities, and participatory action research activities are focused on measuring performances, improving practices, and learning from experience.</p> <p>Naba'a shares the results of the mentioned activities with its staff through internal meetings, and with external stakeholders and through the coordination platform it participates in; however, the results of learning and evaluation are not shared on platforms that are accessible to a wide number of peers in the humanitarian community.</p> <p>Naba'a's staff turnover is low, which enables the organisation to retain information and knowledge; however, Naba'a does not systematically manage its documentation according to best practices, such as dating or version tracking.</p>	<p>The communities interviewed stated being involved in evaluation and learning activities, such as focus groups and participatory research; however, they did not recall being presented with the results of those activities.</p>	2.3
<p><b>Commitment 8:</b> Staff are supported to do their job effectively, and are treated fairly and equitably</p>	<p>Naba'a's has a clear approach to staff competencies' management and reinforcement as shown by its Strategic Framework and internal audit tool. Naba'a supports its staff through a training action plan and by encouraging and sponsoring them to enrol in relevant training.</p> <p>Naba'a's staff consider that its policies and procedures regarding staff management are fair, transparent and non-discriminatory. Naba'a has Security Guidelines and Emergency Preparedness Plans (EPP) and during the Covid-19 pandemic, has put in place a series of processes in order to ensure the safety of its staff. While the EPP did not specifically planned for a health related crisis as important as the Covid-19 pandemic, it nonetheless provided a framework from which to enable decision making, disbursement of emergency funds and flexibility in the activities.</p> <p>At the beginning of the staff contract, Naba'a organises an induction period that includes training on key policies, such as the Child Protection Policy (CPP) and the Code of Conduct (CoC), and site visits. However, the staff member interviewed were not consistently aware of the existence and contents of Naba'a's Anti-Corruption and risk Policy, affecting the overall understanding of the CPP and CoC.</p>	<p>The communities interviewed stated that Naba'a's staff are very capable and have the necessary expertise to conduct their activities.</p>	3
<p><b>Commitment 9:</b> Resources are managed and used responsibly for their intended purpose</p>	<p>Naba'a has policies and procedures to ensure that resources are well managed, such as the Anti-Corruption and Risk Policy, the Internal Audit Toolkit, the Criteria for the Selection of Partners, the Help in Preserve the Environment Manual. However, the Anti-Corruption and Risk Policy is not consistently known by staff.</p>	<p>The communities interviewed were unaware of any corruption cases involving Naba'a and some explained being involved in environment-related activities.</p>	2.4

	<p>The internal audit policy has been finalised only recently and has not been rolled out to all the projects yet. Ways to prevent or identify suspected fraud and corruption cases are not consistently known by staff.</p> <p>Naba'a's Board of Directors is involved in the selection of funding partners and of projects, and ensures that both are in line with Naba'a strategy; however, there is no specific procedure regarding the acceptance of private donations</p> <p>Naba'a has developed a set of activities in order to consider the impact of its activities in the environment, such as litter cleaning, or responsible handicraft activities), and has trained its staff, volunteers and some community members on environmentally friendly behaviours.</p>		
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## 5. Summary of non-conformities

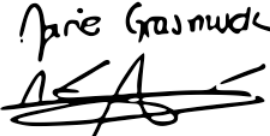
Corrective Action Requests (CAR) / Weaknesses	Type	Resolution due date	Date closed out
CAR 2019 – 3.6: Potential effects on the environment are not systematically covered in Baseline Analysis, Risk Analysis or Participatory Needs Assessment and acted upon.	Minor	2021/07/23	
CAR 2020– 4.1: Naba'a does not provide information to communities about the principles it adheres to, the expected behaviour of the staff and the programmes it is implementing in a consistent manner.	Minor	2022/03/06	2020/07/17
CAR 2020 – 5.6: Communities are not fully aware of the expected behaviour of humanitarian staff, including organisational commitments made on the prevention of sexual exploitation and abuse.	Minor	2021/07/23	
CAR 2020 – 5.1: The communities are not consulted on the design, implementation and monitoring of the complaint handling mechanism.	Minor	2022/03/06	
2018 – 9.4: The impact on the environment when using local and natural resources is not systematically considered.	Minor	2021/03/06	2020/06/05

## 6. Sampling recommendation for next audit


<b>Sampling rate</b>	<p>No variation from the standard sampling rate is recommended. Sampling should be based on the number of projects active at the time of the MA.</p> <p>It is recommended to organise in-person site visits at the MA, since Minor CAR 5.6 presents a major risk, and community consultations will be necessary to collect adequate information on the progress of Naba'a on this indicator.</p>
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<b>Specific recommendation for selection of sites</b>	<p>It is recommended to select sites from all areas of intervention of Naba'a, and to maximise the respondents from outside the Naba'a centres, which are usually receiving more scrutiny.</p> <p>At the maintenance audit, the organisation of in-person individual interviews (including with community committee members) is recommended. As much as possible, interviewees should be chosen randomly.</p>
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## 7. Lead auditor recommendation

<p>In our opinion, Naba'a has implemented the necessary actions to close the minor CARs identified in the previous audit. We recommend the maintenance of the certification.</p>	
<b>Name and signature of lead auditor:</b>    Marie Grasmuck, Lead Auditor, HQAI	<b>Date and place:</b>  Date and place: July, 23rd, 2020, Metz (FR)

## 8. HQAI decision

<input checked="" type="checkbox"/> Certificate maintained <input type="checkbox"/> Certificate suspended	<input type="checkbox"/> Certificate reinstated <input type="checkbox"/> Certificate withdrawn
<b>Next audit</b> Maintenance Audit to be completed before 2021/07/23	
<b>Name and signature of HQAI Executive Director:</b>    Pierre Hauselmann	<b>Date and place:</b>  23 <sup>rd</sup> July 2020, Geneva

## 9. Acknowledgement of the report by the organisation

<b>Space reserved for the organisation</b>	
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 type="checkbox"/> no
<b>Acknowledgement and Acceptance of Findings:</b>	
I acknowledge and understand the findings of the audit	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
I accept the findings of the audit	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
<b>Name and signature of the organisation representative:</b>    <b>Dr. Qassem El-Saad</b> General Manager	<b>Date and place:</b>  14 SEP 2020

## 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

<b>0</b>	<b>Major non-conformity or Major weakness</b>
	Your organisation currently does not work towards applying this requirement, either formally or informally. It's a major weakness that prevents your organisation from meeting the overall commitment.
<b>1</b>	<b>Minor non-conformity or Minor weakness</b>
	Your organisation has made some efforts towards applying this requirement, but these efforts have not been systematic.
<b>2</b>	<b>Observation</b>
	Your organisation is making systematic efforts towards applying this requirement, but certain key points are still not addressed.
<b>3</b>	<b>Conformity</b>
	Your organisation conforms to this requirement, and organisational systems ensure that it is met throughout the organisation and over time – the requirement is fulfilled
<b>4</b>	<b>Exceptional conformity</b>
	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.