

-1-

# Norwegian Refugee Council (NRC) Initial Audit - Summary Report - 2024/08/27

## 1. General information

## 1.1 Organisation

Туре	Mandates	Verified
<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></ul>	<ul><li>☑ Humanitarian</li><li>☐ Development</li><li>☑ Advocacy</li></ul>
Legal registration	NRC is registered as a foundation under Norwegian law (registration number 977538319).	
Head Office location	Oslo, Norway	
Total number of organisation staff		8,546

#### 1.2 Audit team

Co-lead auditor	Jorge Menéndez Martínez
Co-lead auditor	Joanne O'Flannagan
Third auditor	
Observer	
Expert	
Witness / other participants	Members of FCDO Due Diligence team participated in Head Office assessment in Oslo (onsite).

# 1.3 Scope of the audit

CHS:2014 Verification Scheme	Certification			
Audit Cycle	First cycle			
Type of audit	Initial Audit			
Scope of audit	The audit covers the whole organisation, including NORCAP. The audit includes NRC's Head Office in Oslo, Regional and Country Offices, and all humanitarian and advocacy programming implemented by NRC, both directly and through partners.			

# 1.4 Sampling\*

Sampling unit		Country Programme	
Total number of Country Programme sites include	33		
Total number of sites for onsite visit		3	
Total number of sites for remote assessment		4	
Sampling Unit Selection			
Random Sampling — remote/onsite Purposive Sampli		ng - remote/onsite	
Democratic Republic of Congo (DRC) CO - Remote	Ethiopia CO - Onsit	e	
Iran CO (covering Iran and Tajikistan) - Remote	Colombia CO (covering Colombia, Ecuador and Panama) - Onsite		
Ukraine CO – Onsite	Bangladesh CO - Remote		
South Sudan CO - Remote			

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-2-

Any other sampling considerations: The audit team sampled staff for interview from NRC's Regional Offices (RO) representing the COs sampled for onsite assessment. The auditors also interviewed a selection of NORCAP staff at HO as well as NORCAP experts in the countries sampled for onsite assessment.

**Sampling risks identified:** There are no sampling risks identified. The audit team has full confidence in the findings and conclusions of this audit based on the sample as outlined above.

\*It is important to note that the audit findings are based on a sample of an organisation's activities, programmes, and documentation as well as direct 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 Opening Meeting

Date	2024/02/26	Number of participants	61
Location	Remote	Any substantive issues arising	None

#### 2.2 Locations Assessed

Locations	Dates	Onsite or Remote
Norway HO	5-8, 21 March, 2, 10, 18 April	Onsite and remote
Ethiopia CO	11-15 March	Onsite
Kenya RO	20-20 March, 2, 3, 15 April	Remote
Colombia RO and CO	8 March, 8-12, 19, 29 April, 2 May	Onsite
Bangladesh CO	25 March, 15, 16 April	Remote
Iran CO	17, 29 April	Remote
Poland RO	10, 19 April 2024	Onsite and remote
Ukraine CO	22-26, 30 April 2024	Onsite and remote
South Sudan CO	15-19, 26, 29 April 2024	Remote

#### 2.3 Interviews

Level / Position of interviewees	Number of interviewees		Onsite or remote
	Female	Male	Onsite of remote
Head Office			
Management	14		Onsite and remote
Staff	9		Onsite and remote
Board Members	1		Onsite
Regional, Country and Area Offices			
Management	25	32	Onsite and remote

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Total number of interviewees	97	67	164
Stakeholders	18	10	Onsite and remote
Partner staff	3	1	Onsite and remote
NORCAP experts		2	Remote
Staff	27	22	Onsite and remote

## 2.4 Consultations with communities

Town of warm and booking	Number of interviewees		Onelte en nemete	
Type of group and location	Female	Male	Onsite or remote	
Group discussion - female project participants – Tsore refugee camp, Ethiopia	7		Onsite	
Group discussion - male project participants – Tsore refugee camp, Ethiopia		11	Onsite	
Group discussion – refugee committee – Tsore refugee camp, Ethiopia		8	Onsite	
Group discussion – female project participants – Homosha woreda, Ethiopia	10		Onsite	
Group discussion – male project participants – Homosha woreda, Ethiopia		16	Onsite	
Group discussion – refugee committee – Bambasi refugee camp, Ethiopia	6	4	Onsite	
Group discussion – female project participants – Bambasi refugee camp, Ethiopia	12		Onsite	
Group discussion – male project participants – Bambasi refugee camp, Ethiopia		10	Onsite	
Group discussion – IDP committee – IDP camp, Bambasi, Ethiopia	4	9	Onsite	
Group discussion – female project participants – IDP camp, Bambasi, Ethiopia	10		Onsite	
Group discussion – male project participants – IDP camp, Bambasi, Ethiopia		11	Onsite	
Group discussion - project participants – Education Project, Colombia	3		Onsite	
Group discussion - project participants – Education Project, Colombia	1	1	Onsite	
Group discussion - project participants – Emergency Response Project, Colombia	2	2	Onsite	
Group discussion – Community Leaders - Building Territory, Identity and Culture for Peace Project, Colombia	1	5	Onsite	
Group discussion – Male project participants – Building Territory, Identity and Culture for Peace Project, Colombia		3	Onsite	
Group discussion - Female project participants – Building Territory, Identity and Culture for Peace Project	3		Onsite	
Individual consultation – female project participant (IDP) – Stryi, Ukraine	1		Onsite	



Total number of participants	103	89	192
Group discussion – female project participants (teachers) – Lviv, Ukraine	11		Onsite
$\label{eq:Group discussion-mixed-(IDPs)-Lviv, Ukraine} Group \ \mbox{discussion} - \mbox{mixed} - (\mbox{IDPs}) - \mbox{Lviv}, \mbox{Ukraine}$	7	3	Onsite
Individual consultation – female project participant (IDP) – Truskavets, Ukraine	1		Onsite
Individual consultation – female project participant (IDP) – Truskavets, Ukraine	1		Onsite
Group discussion – female project participants (teachers) – Truskavets, Ukraine	9		Onsite
Individual consultation – female project participant (IDP) – Truskavets, Ukraine	1		Onsite
Individual consultation – male and female project participants (IDP) – Truskavets, Ukraine	1	1	Onsite
Individual consultation – female project participant (IDP) – Truskavets, Ukraine	1		Onsite
Group discussion – mixed – (IDPs) – Stryi, Ukraine	8	5	Onsite
Individual consultation – female project participant (IDP) – Stryi, Ukraine	1		Onsite
Individual consultation – female project participant (IDP) – Stryi, Ukraine	1		Onsite
Individual consultation – female project participant (IDP) – Stryi, Ukraine	1		Onsite

### 2.5 Closing Meeting

Date	2024/05/28	Number of participants	59
Location	Remote	Any substantive issues arising	None

## 3. Background information on the organisation

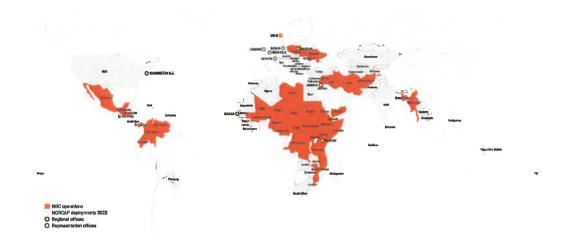
# 3.1 General information

Norway Refugee Council (NRC) is a humanitarian, non-governmental, non-profit organisation founded in 1946 under the name "Europahjelpen" ("Aid to Europe") to assist refugees in Europe after World War II. In 1953, the organisation changed to its current name, Norwegian Refugee Council. In 1991, with the support of the Norwegian government, NORCAP was founded. NORCAP is a part of NRC and a global provider of aid expertise and solutions to the humanitarian, development and peace-building sectors. NORCAP has a pool of more than 1,000 professionals who have been recruited to meet the changing demands of a wide range of partners, situations, and crises. NORCAP works in two complementary ways to improve aid, providing targeted expertise to strengthen its partners' response and collaborating with partners to develop solutions to unmet gaps and challenges.

NRC (including NORCAP) is a rights-based organisation committed to the humanitarian principles of humanity, neutrality, independence, and impartiality.

In 2023, NRC was operational in 40 countries in Europe, America, Africa, and Asia, with 8,546 employees.





The Global Strategy 2022-2025 aim to achieve the following objectives:

- □ Displacement- affected people can access quality services and protection
- □ Displacement- affected people are safe and can exercise their rights
- Displaced people secure durable solutions

NRC programmes are concentrated on six activities in the field:

- □ Education
- ☐ Information, counselling and legal assistance (ICLA)
- Livelihoods and food security
- □ Protection from violence
- □ Shelter and settlements
- □ Water, sanitation and hygiene promotion (WASH)

Each country programme has defined its own strategy through a participatory and consultative process that selects local and contextually relevant priorities in alignment with NRC's Global Strategy 2022-2025.

In 2023, NRC reached almost 10 million people in countries affected by crisis. According to its 2023 financial statements, total operating revenues reached US\$767 million (NOK8.097 billion), which represents a 5.3 per cent increase in USD (15 per cent increase in NOK) compared to 2022. The main donors of NRC in 2023 were the Norwegian Ministry of Foreign Affairs (NMFA), The US Bureau for Humanitarian Assistance (BHA) and European Civil Protection and Humanitarian Aid Operations (ECHO), which collectively provided more than 40 % of the total funds.

# 3.2 Governance and management structure

NRC is a foundation ('stiftelse' in Norwegian), registered in Norway and regulated by the Foundations Act of 2001 and the Foundation Authority (Stiftelsestilsynet). There are several other entities connected with NRC, some of these are separate legal entities, such as NRC USA, and some are "projects" of NRC, such as the Internal Displacement Centre (IDMC). All of these entities form part of NRC's overall governance structure.

The Board of Directors is the NRC's highest authority and has overall responsibility for the satisfactory administration of NRC in accordance with the Articles of Association, the Foundations Act and other applicable laws and regulations. The Board appoints the Secretary General and determines his/her job description and mandate.

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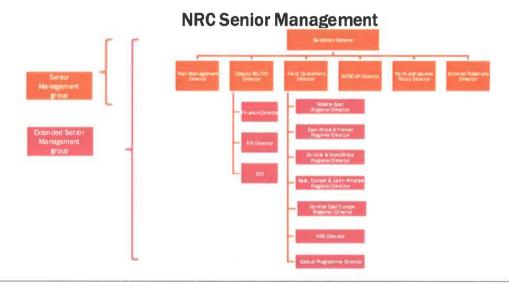
-6-

The Secretary General is responsible for the overall daily management of the organisation in accordance with instructions given by the Board and in line with the Articles of Association. The Secretary General represents NRC externally and is accountable to the Board.

The Senior Management Group (SMG) functions as an advisory forum to the Secretary General. It is the principal strategic forum for NRC's senior leadership where issues of overall importance for the organisation are discussed and approved. The members of the SMG are

- Executive Director of Organisational Development.
- Executive Director of Field Operations.
- Executive Director of NORCAP.
- Executive Director of Partnerships and Policy.
- Executive Director of External Relations.
- Director of Risk Management.

NRC also has an Extended Senior Management Group (ESMG), which serves as a forum for discussion and alignment on issues of relevance to all levels of the organisation, including strategic priorities, results and risk management.



#### 3.3 Work with partner organisations

NRC recognises partnerships as one of the sub-objectives and one of the strategic enablers of its new strategy. The Global Strategy 2022-2025 aims to partner with local NGOs and institutions to extend and sustain the impact of NRC response. NRC bases its partnerships on shared objectives and complementary expertise. NRC is a signatory to the Grand Bargain agreement, and in line with this, its strategy aims to increase locally led action.

At the time of this audit, NRC is developing a new policy that aims to partner with other organisations and actors to optimise humanitarian outcomes for the communities and individuals it supports. NRC partners with different local actors including local and national NGOs, civil society organisations, local and national authorities, private sector and academia.

NRC uses an organisational assessment tool to assess local partners and allocates funds, if needed, to develop capacity building plans to increase partners' capacities and mitigate key partnership risks.

NRC is implementing several actions to increase the number of partners it works with. Currently NRC implements 6 % of its programmes through partners.

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## 4. Overall performance of the organisation

4.1 Internal quality assurance and risk management mechanisms

NRC has well established internal quality assurance, internal control and risk management mechanisms. Terms of Reference are established for the Board including the Audit and Risk Committee which provides independent oversight, advice and guidance on: the adequacy of NRC's risk management; internal controls and frameworks for compliance and safeguarding; oversight of internal audit activity, external auditors and other providers of assurance; and financial statements and public accountability reporting.

The Internal Audit (IA) Charter defines the IA functions while the Risk Management Policy establishes how NRC manages risk, including enterprise and operational risks as well as risks to individuals. NRC's framework for risk management and internal control follows the Institute of Internal Auditors' (IIA) Three Lines Model. A Risk and Compliance Department provides advice on global regulatory and legal compliance issues, including counterterrorism and sanctions and works closely with relevant staff in the regional teams who oversee Country Office level risk and compliance reporting. The department also hosts the investigations function covering serious concerns raised in relation to PSEAH, data protection, fraud and corruption and legal (including counterterror and sanctions). Enterprise-level risks include financial, strategic, operational and reputational as well as risks of harm to project participants (including SEAH); these are monitored on a regular basis. A Governing Documents Policy establishes common standards and procedures when developing governing documents.

Financial Management and supply chain procedures are clearly described and well understood. The Anti-Corruption Handbook governs NRC's anti-fraud control environment, and procedures and controls are established and documented in manuals, policies and standard operating procedures. Staff at all levels know how to report fraud, bribery or corruption through NRC's whistleblowing mechanism. NRCs management of and support to staff is outlined in its HR handbook. Global guidance sets out the principles and processes for recruitment and selection, including induction to ensure staff have a clear understanding of key policies and procedures including the Code of Conduct and other policies related to professional conduct; staff are clear on related mandatory reporting requirements and associated procedures.

NRC has a global MEL framework which sets out how M&E data supports decision making and programme quality assurance. Data collection mechanisms include quantitative monitoring activities, quality assessments and a range of evaluation types to gather evidence on the quality, relevance and effectiveness of NRC programmes. The framework includes a global results framework.

# 4.2 Level of application of the CHS

NRC's Board, management and staff at all levels demonstrate a clear understanding of, and commitment to the CHS. NRC has embedded its principles and values across the organisation and its ways of working, and these are reflected in how staff engage with each other, with their responsibilities, with partners, and with communities, i.e. with integrity, professionalism, respect and openness. NRC is a large organisation, operational across multiple countries and frequently operating in complex contexts and hard to reach locations. Its staff are deeply committed and NRC has established policies, procedures and systems to support staff to carry out their roles effectively. NRC is an experienced and agile organisation with the capacity and capability to deliver timely humanitarian programming, at scale, across its operations. NRC's Global Strategy 2022-25 prioritises the centring of displacement-affected people, recognising diversity and difference within and across populations. In line with the CHS, the strategy aims to accelerate quality, accountability and learning in its programming. This commitment is underpinned by significant recent investments in resources related to PSEAH, community engagement and participation, complaint handling mechanisms and safe and inclusive programming.

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NRC performs well in terms of support for local capacities and working towards improving the resilience of communities, although the organisation can do more to support the development of local leadership and organisations in their role as first responders. NRC has recently updated its systems and policy to provide an overarching framework for whistleblowing about staff misconduct and other serious concerns (Speak Up). The organisation is also reviewing its PSEA/SH and Child Safeguarding policies with a view to developing a new policy that will provide a clearer overarching focus on sexual misconduct. At the current time, the comparably low number of complaints, particularly those in relation to misconduct (including allegations of SEAH), suggests that complaint handling mechanisms are not yet fully effective and this is confirmed through staff interviews and community consultations. NRC is not yet systematically ensuring that communities are fully informed about its Code of Conduct and PSEAH commitments and of what behaviours they can expect from staff.

Internal controls, compliance and risk management, and procedures and systems that support the delivery of high-quality programmes are well established and underpin the delivery of efficient, effective, relevant and appropriate programming.

This audit raises 6 Minor CARs (3.3, 3.8, 4.1, 4.4, 5.1 and 5.6).



#### 4.3 Organisational performance against each CHS Commitment

Strong points and areas for improvement	Average score*
Commitment 1: Humanitarian assistance is appropriate and relevant	2.7

NRC states its commitment to independence and impartiality and to providing assistance based on the needs and capacities of the communities. NRC undertakes systematic context and stakeholder analysis, which is described and considered in its country strategies and projects.

NRC designs and implements programmes based on an impartial assessment of needs and risks and an understanding of the vulnerabilities and capacities of different groups. NRC carries out different types of evaluations and analyses depending on the projects, e.g. needs assessments, stakeholder mapping, market analyses, among others. NRC has monitoring mechanisms in all the countries, and programmes are adapted based on the monitoring and the information collected. NRC systematically collects data disaggregated by sex and displacement status; however, other vulnerabilities, such as people with disabilities, and ages, are not collected in all projects and programmes, and no policy or guideline requires it.

NRC works closely with local actors to ensure that programmes are relevant for the communities and adapted to the local context. NRC has regular meetings with communities to consider any changes in their needs, capacities and priorities. NRC adapts the programmes according to the changes in context and the needs or capacities of stakeholders.

#### Feedback from communities:

Communities share a deep appreciation for the assistance provided by NRC, stating that they feel satisfied with the support and that it is in line with their preferences, needs and capacities. Also, they describe the support as fair and impartial.

Communities state that NRC usually consults them during the assessments and implementation and adapts projects, if necessary, to their changing preferences, needs and capacities. However, some community members state that not all different groups are consulted, for example, people with disabilities.

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

2.7

NRC has clear protocols for entry to and exit from a country. NRC ensures that programmes align with its capacities through the Go-No Go process and at the project planning meetings. Projects and programmes consider risks and constraints during their design and implementation. NRC develops a monitoring matrix during the project's design and includes funds in the budget to ensure its implementation. Progress review meetings are held to measure progress.

NRC is committed to ensuring that communities affected by crisis are receiving timely and effective assistance. NRC develops and regularly updates emergency preparedness plans and security plans. NRC has procedures, surge capacity and emergency plans to respond more effectively and without delay.

NRC has strong relationships with local partners, leaders, and stakeholders and refers unmet needs to other agencies and organisations with relevant expertise. The Safe and Inclusive Programming Minimum Standards include a specific standard on internal and external referrals. NRC issued additional guidance on referrals in 2024, however, not all COs systematically refer unmet needs in accordance with available standards and guidance.

NRC uses the relevant standards in all their project and programmes, and Core Competency staff at Global, Regional and Country levels support and train country teams to ensure their use.

#### Feedback from communities:

Communities state that there are no disadvantages or risks in accessing the assistance, and programmes and projects are realistic and safe. Community members state that NRC staff ensures that they can access assistance safely. Furthermore, they express satisfaction with the timeliness of implementation, and in case of delays, NRC always informs them. However, some communities state that there have been delays in adapting some of the projects and programmes activities.

Communities state that NRC listens to them and considers their opinions and that NRC's technical skills are good.

-9-



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

2

NRC's Global Strategy outlines commitment to ensuring safe programming and establishing an effective system for managing the risk of doing harm to the people it serves. The Safe and Inclusive Programming (SIP) Toolkit establishes safe and inclusive minimum standards for the design, delivery and evaluation of programmes in a way that meets the specific needs of diverse groups, while considering the risks they face and minimising harmful, unintended consequences. The strategy also commits to increasing NRC's levels of collaboration and exchange with local actors including support for the removal of barriers for local actors to provide assistance or services and greater engagement with local knowledge and capacities. NRC routinely engages with and delivers capacity support to relevant local authorities, services and communities to build increased resilience, although the organisation does not routinely engage with local actors to strengthen their capacity as first responders.

NRC's programmes endeavour to safeguard communities from harm and abuse and the organisation assesses community risks through a range of mechanisms, however processes do not yet fully support the identification of potential/actual negative effects across all dimensions of the requirement to allow NRC to identify and act on these in a systematic way.

NRC is committed to promoting early recovery, including through the prioritisation of cash-based assistance. This is evidenced across programming designed to promote increased resilience and recovery at household and community levels.

NRC has a comprehensive framework for data protection however, not all staff are clear on policy requirements.

#### Feedback from communities:

Communities express widespread appreciation of livelihood recovery as well as cash support, particularly where this offered flexibility by allowing households to choose how to spend in terms of their priority needs.

Communities consistently express the view that they are better able to cope with their circumstances due to the support and services of NRC. However, in some contexts, communities are not always clear on how long support from NRC will continue.

Communities believe that NRC considers their safety, dignity and rights when delivering programmes.

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

12

NRC has an open culture of communication and is committed to transparency; its policy on Open Information is available on its website and users are directed on how to request information. A culture of open and transparent communication is demonstrated through policy commitments and practice, and external communications are ethical and respectful and represent communities in a dignified way.

Under its Global Strategy, NRC commits to safe and inclusive engagement and communication with communities although this commitment is not yet fully articulated in the organisation's project cycle management guidance. At a programme level, there is limited evidence that participation in community consultation processes is inclusive of groups at risk of marginalisation or exclusion.

While NRC has general guidance in place with regard to requirements for sharing information with communities, there is no clear minimum standard established. Staff demonstrate an understanding of the expectation to inform communities about NRC (its mandate and mission) and about planned programme activities although there is less clear understanding on the provision of information on the Code of Conduct and on commitments to PSEAH and zero tolerance of fraud and corruption. In general, plans for the sharing of information with communities are not well articulated and NRC makes limited use of visual/pictorial information to ensure ease of access and understanding by community members.

In general, NRC has mechanisms in place to gather formal feedback from communities, however, the organisation does not always effectively facilitate inclusive and accessible opportunities for communities to provide feedback on their level of satisfaction and on programme quality.

#### Feedback from communities:

Consultations with communities indicate that information is not systematically provided to them on the principles NRC upholds, the timeframes for activities, and how they can expect staff to behave when working with them. Communities generally consider that communication is appropriately and respectfully provided.

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While some community members confirm they are provided with opportunities to provide feedback, others indicate that NRC does not engage with them to seek their feedback on quality and effectiveness.

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

1.9

NRC has established an organisational culture in which complaints are taken seriously, and acted upon according to defined policies and processes, although the organisation does not have effective systems in place to ensure that it has a reliable and accurate overview of complaints by typology and location at all levels. Staff and leadership demonstrate a clear commitment to welcoming, accepting and following up on complaints.

The Speak Up management system provides an overarching framework for whistleblowing about staff misconduct and other serious concerns and applies to all staff. Duty to report is emphasised in relation to SEAH and other safeguarding concerns as well as fraud, bribery and corruption. An Investigation Standards SOP establishes procedures for investigation and is mandatory for all internal investigations. Staff engaged with serious and sensitive complaint management, demonstrate high levels of professional integrity and competence and a commitment to following timely, survivor-centred and confidential processes

A Complaints and Feedback Mechanism (CFM) Policy and Handbook are in place (currently under review) and CFM mechanisms are established at CO level. However, NRC does not generally consult communities and people affected by crisis on the design, implementation and monitoring of complaints-handling processes. Further, COs do not systematically record and track complaints effectively.

Staff know and understand relevant policies on expected behaviour and have received associated training and orientation. However, there is limited evidence of training, guidance or orientation of staff on how to share this information with communities in ways that are contextually appropriate and meaningfully accessible and the organisation does not have established procedures to routinely confirm community-level awareness of commitments on the expected behaviour of staff and on PSEAH.

#### Feedback from communities:

While communities generally believe that NRC wishes to hear any concerns and understand that NRC will accept their complaints, some community members expressed a lack of confidence to raise complaints.

While community members recall being provided with general information about NRC and the project, many community members, at different project sites, do not recall receiving information about NRC's CoC or standards of behaviour for staff, nor of its commitments on the prevention of SEAH. There was a wider general understanding among community members about NRC's commitment to the prevention of fraud and corruption.

In general, communities perceive NRC as responsive to complaints and concerns.

#### **Commitment 6:** Humanitarian response is coordinated and complementary

2.8

NRC is committed to the coordination and complementarity of its activities and ensures that activities create no duplication and are coordinated with national and local authorities and other organisations. Staff participate in, lead or co-lead working groups and coordination structures. NRC conduct stakeholder analysis and mapping for ensuring complementarity with other humanitarian actors and alignment with local policy and priorities.

NRC shares knowledge and research through multiple channels in the humanitarian sector, including academia and the media. NRC staff share programme information with stakeholders and in coordination forums.

Partnerships with local organisations are one of the objectives of the Global Strategy 2022-2025. NRC has built transparent and equal relationships with its implementing partners, respecting each partner's mandate, obligations, and independence and recognising their respective constraints and commitments. NRC is developing a new partnership policy and handbook to support staff in increasing collaboration with local actors; however, these have not been rolled out.

#### Feedback from communities:

Communities state that there is no duplication of activities and that NRC coordinates well with local authorities and other organisations.

Community members consider the assistance and programme activities to be coherent and well-coordinated, without unnecessary demands on their resources.

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#### Commitment 7: Humanitarian actors continuously learn and improve

2.5

NRC's commitment to learning and evaluation is stated in its Global Strategy 2022-2025. NRC is committed to continuous learning and improvement and has relevant policies and guidelines in place. NRC is part of knowledge sharing platforms and working groups and is an active contributor to learning and innovation amongst its peers through various means.

NRC draws from lessons learned and experiences when designing projects, strategies and relevant documents; however, NRC country office staff do not systematically take into account lessons learned and experiences from other regions. Findings from monitoring, feedback and community complaints are discussed in progress review meetings for project adaption and improvement. NRC's Recommendation Tracker aims to ensure that all recommendations and suggestions resulting from evaluations, After Action Reviews and field visits are tracked. However, this mechanism is not fully in place in all country offices.

#### Feedback from communities:

Community members have identified positive changes in programmes since the project started and identify changes in the projects made due to feedback provided to NRC.

Communities recall that NRCs have shared learning and innovation; however, it is not a systematic practice.

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

2.6

NRC has effective policies, systems and processes in place to ensure that management and staff are recruited, inducted, managed and supported to ensure it has the necessary capacity and capability to deliver its programmes, including in preparation for possible emergency situations across various key functions. However, adherence to performance management processes is not consistent across all levels of the organisation, particularly at HO level. NRC has policies and procedures in place to ensure that staff are treated equitably and fairly.

A Code of Conduct is in place, and clearly establishes the obligation of staff not to exploit, abuse or otherwise discriminate against people. PSEAH principles are reflected in the CoC, including the duty to report allegations or suspicions of SEAH. However, the CoC is not always translated into relevant languages at CO level and there is no system in place to monitor and track violations of the Code of Conduct.

While NRC is committed to being a learning organisation and supporting staff to improve their skills and competencies, the organisation lacks a coherent institutional approach to staff learning and development and budgets and plans for staff learning and development are not always available at CO level.

NRC has a comprehensive framework of policies and procedures in place for the management of staff health, safety and security (HSS) and allocates substantial resources at all levels to ensure risks to safety and security are identified, and actively mitigated and managed. Duty of Care is defined in policy with a dedicated intranet site that provides access to policies, tools and training for staff. At a global level NRC has service agreements with providers of specialised services for staff care to support wellbeing and manage stress.

Stakeholders emphasise the professionalism of staff and consider them to be competent, technically skilled and to act with integrity.

#### Feedback from communities:

Communities consider that NRC staff treat them with respect, dignity and compassion.

Communities perceive NRC staff as highly competent and technically proficient.

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

2.8

NRC has policies and processes to ensure resources are managed and used responsibly, including managing the risk of corruption. NRC manages the risk of corruption through several activities, including e-learning, trainings, spot checks, separation of duties in the procurement procedure, and internal audits. Staff are aware of NRC's commitment to zero tolerance and know how to report cases if necessary.

NRC commits to environmentally responsible resource use in its strategy. Programmes and projects have to conduct environmental analysis, develop environmentally sustainable programming, use and promote clean energy and promote the collective action; however, not all the sampled projects had conducted these activities. NRC's

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environmental minimum standards specify that staff have to include environmentally sustainable factors in specifications for material and packing purchases and consider the lifespan of items distributed as selection criteria to avoid additional waste; however, not all Country Offices always take the environmental factors into account when selecting a supplier.

NRC conducts ethical due diligence screening for potential funders and during the Go-No Go process, staff must ensure that any funding opportunity is aligned with NRC Country Strategy and NRC Response Policy.

#### Feedback from communities:

Community members state that NRC and its partners are not wasteful with their resources.

Community members confirm that they had not experienced any incidents of corrupt activities or extortion from staff and they are aware of NRC's commitment to anti-fraud and anti-corruption and that they know how to report if a case is detected.

# 5. Summary of non-conformities

Corrective Action Requests (CAR)	Туре	Status	Resolution timeframe	
2024-3.3: NRC does not routinely engage with local actors to strengthen their capacity as first responders.	Minor	Open	Renewal Audit 2027	
2024-3.8: Procedures for the safeguarding of personal information collected from communities are not systematically applied in all programme sites.	Minor	Open	Renewal Audit 2027	
2024-4.1: NRC does not systematically provide information to communities and people affected by crisis on NRC's principles, its CoC and PSEAH commitments.	Minor	Open	Renewal Audit 2027	
2024-4.4: NRC does not systematically encourage and facilitate inclusive and accessible opportunities for communities, particularly those at risk of marginalisation or exclusion, from providing feedback on the quality and effectiveness of assistance received.	Minor	Open	Renewal Audit 2027	
2024-5.1: NRC does not systematically consult communities and people affected by crisis on the design, implementation and monitoring of complaints-handling processes.	Minor	Open	Renewal Audit 2027	
2024-5.6: Communities and people affected by crisis are not fully aware of NRC's CoC and PSEAH commitments and of what behaviours they can expect from staff.	Minor	Open	Renewal Audit 2027	
Total Number of open CARs		6		

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<sup>\*</sup> 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. Lead auditor recommendation

In our opinion, NRC conforms with the requirements of the Core Humanitarian Standard on Quality and Accountability.				
We recommend certification.				
Name and signature of co-lead auditors:	Date and place:			
Jorge Menéndez Martínez	21 June 2024, Buenos Aires.			
Joanne O'Fladragan	21 June 2024, Belfast.			

# 7. HQAI decision

HQAI decision:	<ul> <li>☑ Certification preconditioned to the provision of a management response</li> <li>☐ Certification preconditioned to the closure of Major CAR</li> </ul>			
Management response expected by: 2024/09/27				
Name and signature of HQAI Executive Director:		Date and place:		
Désirée Walter		Geneva, 27 August 2024		
Final decision on certification:				
Start date of the certification cycle: 2024-10-29  Next audit before: 2025-10-29				
Name and signature of HQAI Executive Director:		Date and place:		
Désirée Walter		Geneva, 29 October 2024		

www.hqai.org -14-



# 8. 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:  If yes, please give details:	☐ Yes	⊠ No	
Acknowledgement and Acceptance of Findings:			
I acknowledge and understand the findings of the audit	Yes	☐ No	
I accept the findings of the audit	⊠ Yes	□No	
Name and signature of the organisation's representative:		place: 24, Oslo	

## **Appeal**

In case of disagreement with the quality assurance decision, the organisation can appeal to HQAI within 14 workdays after being informed of the decision.

HQAI will transmit the case to the Chair of the Advisory and Complaint Board who will confirm that the basis for the appeal meets the appeals process requirements. The Chair will then constitute an Appeal Panel made of at least two experts who have no conflict of interest in the case in question. The panel will strive to come to a decision within 45 workdays.

The details of the Appeals Procedure can be found in document PRO049 - Appeals 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