

Teacher Creativity Centre Association (TCC)

Initial Audit – Summary Report - 2026/03/02

1. General information

1.1 Organisation

Type	Mandates	Verified
<input type="checkbox"/> International <input checked="" type="checkbox"/> National <input type="checkbox"/> Membership/Network <input type="checkbox"/> Direct Assistance <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
Legal registration	sRA-2247-E	
Head Office location	Ramallah	
Total number of organisation staff	27	

1.2 Audit team

Lead auditor	Johnny O'Regan
Audit Facilitator	Nahed Jaber
Third auditor	
Observer	
Expert	
Witness / other participants	

1.3 Scope of the audit

CHS:2024 Verification Scheme	Verification
Audit Cycle	First cycle
Type of audit	Initial Audit,
Scope of audit	Whole organisation
Focus of the audit	The audit had a stronger focus (e.g. both site visits) on activities in the West Bank due to access difficulties in Gaza.

1.4 Sampling*

Sampling unit	Project
Total number of Sampling Units	24
Sample Size	5
Total number of onsite visits	2
Total number of remote assessments	3
Sampling Unit Selection	
Random Sampling – onsite/remote	Purposive Sampling – onsite/remote
Safe Access to Inclusive, Dignified Education and Protection Services for Children in Crises- West Bank (Beta & Kablan- onsite)	Teachers' voices matter to advance the right to education (West Bank – remote)
Enhancing the engagement of educational CSOs in planning and monitoring public education policies – West Bank (remote)	Restoring the Normal Socio-academic Performance of Children Suffering from Socio-academic Dysfunction Associated with Socio-emotional Learning Challenges and the Political Violence (Phase III) (West Bank- Kubar – onsite)

	RISE- Resilient, Inclusive and Safe Education for children affected by conflict in Palestine (West Bank- Tulkarem - onsite)
Any other sampling considerations: Mix of random and purposive sampling to maximise representativeness of projects	
Sampling risks identified: There are no sampling risks identified - the audit team did not undertake site visits to communities in Gaza because of access issues. However, the audit team has full confidence in the findings and conclusions of this audit based on the sample 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	2026/01/12	Number of participants	12
Location	Remote	Any substantive issues arising	No

2.2 Locations Assessed

Locations	Dates	Onsite or remote
Head Office- Ramallah	January 12 & 13	Remote
Community groups including coalition of NGOs/academics etc, students, caregivers. West Bank- Beta, Kablan, Kobar, Tulkarem.	January 20-February 1	Remote & on site

2.3 Interviews

Level / Position of interviewees	Number of interviewees		Onsite or remote
	Female	Male	
Head Office			
Management & staff	5	3	remote
Project site			
Staff	2	1	onsite
Student	1		onsite
Teachers	3	3	onsite
Principal	2		onsite
Ministry of Education		1	onsite
Total number of interviewees	13	8	21

2.4 Consultations with communities

Type of group and location	Number of interviewees		Onsite or remote
	Female	Male	
Education coalition - remote	4	5	Remote
Students - Beta		20	On site
Caregivers - Kablan	5		On site
Students - Kobar	32		On site
Caregivers- Tulkarem	5		On site
Teachers - Kobar	10		On site
Teachers union	2	6	
Total number of participants	58	31	89

2.5 Closing Meeting

Date	2026/02/05	Number of participants	4
Location	online	Any substantive issues arising	The audit team alerted TCC to major weakness on C4 & C5

3. Background information on the organisation

3.1 General information

The Teacher Creativity Center (TCC) is a Palestinian non-for-profit, non-governmental organisation established in 1995 by a group of primary and secondary school teachers from public, private, and UNRWA schools. TCC is dedicated to transforming education in Palestine and the Middle East and North Africa (MENA) region into a socially responsible education system that delivers tangible social outcomes and advances human rights, equity, and sustainable development.

TCC's work is grounded in Article 26 of the Universal Declaration of Human Rights and SDG 4, particularly target 4.7, which emphasises education for sustainable development, global citizenship, human rights, gender equality, inclusion, and a culture of peace and non-violence. In this regard, TCC is the only organization in Palestine explicitly mandated to promote the social outcomes of quality education through a rights-based, community-driven, and outcome-oriented approach.

TCC is officially registered with the Specialised Department at the Palestinian Ministry of Interior under the Charitable Societies Law No. (1) of 2000 (Registration No. RA-2247-E, dated 18/08/2002). The organisation's main office is located in Ramallah in the West Bank, with a branch office in Gaza City.

Under its Strategic Plan (2023–2026), TCC's key strategic goals include:

- Contributing to an enabling environment that ensures marginalised children's access to inclusive, equitable, and quality education.
- Promoting civic engagement, active citizenship, and social accountability, particularly among youth and women.

- Enhancing the psychosocial well-being and socio-academic performance of children and youth, especially those facing emergencies and children with disabilities.
- Strengthening institutional sustainability, accountability, and operational excellence.

TCC is an active member and leader within national, regional, and international education and civil society networks, including the Palestinian Education Coalition, the Palestinian Network of NGOs (PNGO), the Arab Campaign for Education, and the Global Campaign for Education (GCE). In 2024, TCC's total income amounted to approximately 2M USD and at the time of drafting this report it employed 21 staff in the West Bank and 6 staff in Gaza.

3.2 Governance and management structure

TCC's governance and management structure is responsible for accountability, transparency, and strategic oversight. The governance structure consists of the General Assembly, the Board of Directors, and an Internal Audit Committee.

The General Assembly elects the Board of Directors every two years. The Board of Directors is responsible for setting strategic direction, appointing the General Director, and overseeing all technical, financial, and administrative operations of the organisation. It reviews and approves biannual and annual technical, financial, and administrative reports, endorses organisational policies, approves new positions and employment contracts, and ensures compliance with TCC's Code of Ethics and internal regulations.

The Internal Audit Committee, appointed by the Board of Directors, is responsible for conducting annual internal financial audits and strengthening financial accountability and risk management mechanisms.

The management structure is led by the General Director and comprises the following core departments:

- Programs Department, overseeing three main programmatic pillars: Right to Education, Citizenship Education, and Psychosocial Support.
- Administrative and Financial Department, responsible for financial management, procurement, HR, and administrative systems.
- Resource Development Department, which includes the MEAL unit, grants & fundraising unit, and communication units.

3.3 Work with partner organisations

TCC develops partnerships to promote social outcomes of quality education and, to this end, works with a range of public and private stakeholders such as ministries, universities, research centres, local and international NGOs, and human rights organisations. Partnerships work in areas such as gender equality and women's rights, children's rights, youth rights, rural development, poverty reduction, health rights, and education. Criteria for engaging with partners include commitment to international law/Palestinian law, CSOs principles such as integrity, neutrality, equality, justice, and coherence with TCC's own policies, such as safeguarding and child protection. TCC grants very limited funds to partners; for example, in 2025 it sent approximately USD40,000 to partners for project implementation.

4. Overall performance of the organisation

4.1 Internal quality assurance and risk management mechanisms

TCC undertakes quality assurance through monitoring and evaluation exercises and project level risk frameworks. It does not have an organisational level risk management framework describing how it measures likelihood and impact of (e.g. strategic, financial, reputational) risks. TCC does not have an internal audit function in its management structure, but finance staff are involved in monitoring implementation of financial procedures and any allegations of financial impropriety.

4.2 Level of application of the CHS

TCC performs strongly on many CHS commitments. Its focus on needs and vulnerabilities is clear: staff and programmes demonstrate a commitment to working with vulnerable individuals across Palestine. TCC builds on local knowledge supported by its strong contextual understanding across all the areas where it implements programmes. TCC demonstrates a flexible and adaptive approach to programming and has solid technical expertise. TCC performs well at knowledge transfer, and its programmes support resilience through immediate and longer-term support for coping mechanisms. TCC is very conscious of risks to communities, prioritises their physical safety and wellbeing and safeguards their personal information, though the lack of protocols for data protection puts continued good practice in this area at risk. Risks related to sexual exploitation abuse and harassment (SEAH) by staff in communities are not fully captured nor analysed, making it difficult for TCC to have a coherent approach to the prevention of SEAH (PSEAH). TCC has only recently begun to roll out its complaint's mechanism, and significant weaknesses remain. Likewise, the lack of environmental policy and tools challenge its capacity to prevent and mitigate the negative impact of programmes on the environment.

TCC's approach ensures strong coordination with external stakeholders such as the Ministry of Education and partners, and it has a professional and empathetic staff. It manages its resources efficiently and effectively, though the prevention and detection of fraud is challenging due to a lack of staff training on anti-corruption, the weaknesses in the complaints mechanism for reporting corruption or fraud and the risk management framework.

This audit raises 19 minor weaknesses and two major weaknesses (see 4.4 below); notes 3 observations.

4.3 PSEAH

TCC's approach to preventing SEAH is detailed through a recently developed safeguarding policy. The policy commits to taking a survivor centred approach and outlines the complaints mechanism. However, the complaints mechanism is at an early stage and as described in section 4.4 below, there are a number of gaps in its processes such as lack of community awareness of expected staff behaviour or monitoring of that awareness by TCC. TCC undertakes limited risk analysis related to SEAH. Communities have limited understanding of how to make complaints or how the system would respond to those complaints. However, communities were confident that TCC would take any complaints seriously and handle them impartially and professionally.

4.4 Organisational performance against each CHS Commitment

Strong points and areas for improvement	Average score*
Commitment 1: People and communities can exercise their rights and participate in actions and decisions that affect them.	2
<p>TCC's participative approach heightens the sense of community ownership of programming. It is committed to transparent and open engagement with communities, and it ensures informed consent when it comes to depicting communities. However, the lack of a formal information sharing plan and gaps in awareness raising regarding SEAH results in a general lack of community understanding of TCC's commitments to PSEAH. Nonetheless, communities are comfortable with TCC's approach to information sharing.</p>	
<p>Feedback from communities: TCC communicates appropriately and is an inclusive organisation with a participatory approach to programming. However, there were gaps in awareness regarding PSEAH commitments.</p>	
Commitment 2: People and communities access timely and effective support in accordance with their specific needs and priorities.	2.7
<p>TCC builds on local knowledge and capacity in the development of programmes. It applies technical standards in line with good practice and has a flexible approach to programming and uses monitoring results to adapt programmes to make them timely and relevant to changing contexts, needs and circumstances. Its links with external stakeholders help it to highlight priority needs that it cannot meet itself. However, gaps in its analysis of vulnerabilities related to SEAH are a risk factor.</p>	
<p>Feedback from communities: TCC listens to communities and is fair and transparent. TCC is flexible and open to changing programmes where it can. Staff have good technical knowledge which is transferred to communities.</p>	
Commitment 3: People and communities are better prepared and more resilient to potential crises.	3
<p>TCC's programmes support community leadership and ownership of resources and contribute to resilience through short term and long-term benefits from interventions. It plans and implements programs with local ownership at their core.</p>	
<p>Feedback from communities: Communities appreciate the prioritisation of local ownership, resilience building programmes and development of coping mechanisms.</p>	
Commitment 4: People and communities access support that does not cause harm to people or the environment.	0
<p>TCC is committed to ensuring that programmes do not cause unintended negative effects but does not have robust tools to identify any potential negative effects related to SEAH by staff or to mitigate concerns. TCC is very conscious of risks to communities and the need to ensure safe and ethical data management and protection but lacks policy, procedures or tools. Without this system, there is a high risk of both duplication of effort and missing certain risks and being able to mitigate them. The lack of environmental framework or approaches to measure the environmental impact of programmes is also an area where improvement need to be made.</p>	

<p>Feedback from communities: TCC is concerned about community security and safety and ensuring safe management of data. However, communities generally had limited understanding of their approach to delivering these commitments. Nonetheless, no negative impacts of programs were observed.</p>	
<p>Commitment 5: People and communities can safely report concerns and complaints and get them addressed.</p>	0
<p>TCC's complaints mechanism is at an early stage of development and is rooted in the safeguarding policy. It does not cover corruption or programming related complaints. The safeguarding policy commits to a survivor centred approach, but the lack of complaints recorded makes it difficult to ascertain how this is put into practice in the investigation, management and referral of complaints. Equally, TCC has not developed tools to measure community understanding of expected either staff behaviour or how to report complaints.</p>	
<p>Feedback from communities: Communities have very limited awareness of expected staff behaviour (except in a general sense of what is appropriate and inappropriate) and are not aware of how to make complaints. However, communities' express confidence in TCC to manage any complaints raised.</p>	
<p>Commitment 6: People and communities access coordinated and complementary support.</p>	2
<p>TCC has strong links with a range of relevant stakeholders, including government ministries, networks, alliances, INGOs and local NGOs. TCC engages with these stakeholders to deliver locally led actions provided such partnership does not compromise TCC's commitment to transparency and accountability and supports participatory approaches to contextualised programming. TCC avoids duplication and supports partners to ensure synergies, quality and mutual accountability. TCC carefully manages the number of partners they work with.</p>	
<p>Feedback from communities: TCC works well with government, other INGOs and all stakeholders.</p>	
<p>Commitment 7: People and communities access support that is continually adapted and improved based on feedback and learning.</p>	2.6
<p>TCC is responsive to feedback from communities and makes changes to reasonable suggestions in line with its capacity. TCC collects disaggregated data that reflects community diversity and does so in a respectful manner. This data is used to make informed decisions. TCC does not systematically share the results of learnings with communities but does with other stakeholders such as government ministries.</p>	
<p>Feedback from communities: TCC is a responsive organisation that takes community input seriously and is always willing to make changes to programmes where budgets and rules allow but does not always share the results of learning.</p>	
<p>Commitment 8: People and communities interact with staff and volunteers that are respectful, competent, and well-managed.</p>	2.4
<p>TCC's leadership and staff are committed to quality and accountability. HR policies are ethical, legally sound and staff find them to be fair. TCC is committed to staff development, and they have multiple opportunities for learning. However, TCC does not have a dedicated staff training budget or undertake any structured training needs analyses. TCC takes any impropriety seriously and takes decisive action when it happens. However, its code of conduct does not cover SEAH, and it does not provide safeguarding training to staff.</p>	
<p>Feedback from communities:</p>	

Staff are professional and responsive, have strong technical knowledge and treat communities with respect. Communities noted no instances of negative behaviour but there was limited community awareness of the code of conduct.	
Commitment 9: People and communities can expect that resources are managed ethically and responsibly.	2.3
TCC has a strong and predictable funding base that enhances its capacity to meet commitments. Fundraising is ethical and TCC manages financial resources in line with good practice. However, there are weaknesses in its policy and practice around fraud prevention and detection because of insufficient risk management and complaints mechanisms. There are also weaknesses in TCC's environmental policy base which challenge its ability to measure the environmental impact of its resource usage.	
Feedback from communities: Communities are not aware of waste or financial impropriety. They have confidence that funds are spent for intended purpose and TCC is environmentally responsible.	

* Note: Commitments are scored by taking the mean average score of the requirements, i.e. the sum of all the requirement scores in a commitment divided by the number of requirements in that commitment. Except when a major non-conformity/weakness is issued, in this case the overall score for the Commitment is 0 (CHSA Verification Framework – Scoring Grid, 2024).

5. Summary of weaknesses

Weaknesses	Type	Status	Resolution timeframe
2025-1.2: TCC does not share information with communities about its commitments regarding PSEAH and the expected behaviours of staff in relation to PSEAH	Minor	New	By renewal audit 2029
2025-1.3: TCC does not communicate on PSEAH related to staff in accessible and understandable ways as it does not systematically communicate with communities about PSEAH by staff	Minor	New	By renewal audit 2029
2025-1.3: TCC does not communicate on PSEAH related to staff in accessible and understandable ways as it does not systematically communicate with communities about PSEAH by staff	Minor	New	By renewal audit 2029
2025-2.6: TCC has not developed a coherent organisational approach to ensure its work is based on an understanding of SEAH risks and vulnerabilities of people and communities in their diversity, with attention to the most marginalised.	Minor	New	By renewal audit 2029
2025-4.1: TCC's systems are not sufficiently developed to identify potential and actual negative impacts related to SEAH by its staff	Minor	New	By renewal audit 2029
2025-4.2: TCC does not systematically identify, prevent, mitigate or address potential and actual negative impacts of programmes on the environment.	Minor	New	By renewal audit 2029
2025-4.3: TCC does not systematically ensure the safe, ethical and effective management of data and information related to communities	Minor	New	By renewal audit 2029

M2025-4.4: TCC has not developed a coherent organisational approach to preventing exploitation and abuse, including SEAH, by staff in line with recognised good practice.	Major	New	By renewal audit 2029
2025-4.5: TCC has no coherent organisational approach to reducing the negative environmental impacts of the organisation and its work	Minor	New	By renewal audit 2029
2025-5.1: TCC does not systematically ensure that communities can report concerns and complaints including in related to SEAH by staff	Minor	New	By renewal audit 2029
2025-5.2: TCC does not systematically inform communities about how staff are expected to act to prevent harmful behaviours, including SEAH	Minor	New	By renewal audit 2029
2025-5.3: TCC does not monitor whether communities know how to make complaints about its staff.	Minor	New	By renewal audit 2029
2025-5.4: TCC does not have a system in place to ensure good practice in complaints management.	Minor	New	By renewal audit 2029
2025-5.5: TCC does have a system in place to ensure a victim/survivor-centred approach in complaints management	Minor	New	By renewal audit 2029
M2025-5.6: TCC does not have a coherent organisational approach to ensuring that concerns and complaints are welcomed and acted upon in a timely and appropriate manner	Major	New	By renewal audit 2029
2025-6.2: TCC does not systematically support partners to apply commitments to quality and accountability to people and communities	Minor	New	By renewal audit 2029
2025-6.4: TCC does not systematically support partners to prevent SEAH by partner staff.	Minor	New	By renewal audit 2029
2025:7.4- TCC does not systematically share analysis and learning from feedback and monitoring and related changes with people and communities.	Minor	New	By renewal audit 2029
2025: 8.4- TCC's code of conduct does not specifically prohibit exploitation, abuse, harassment or SEAH and TCC currently does not provide safeguarding training to staff.	Minor	New	By renewal audit 2029
2025:9.4- TCC does not systematically minimise the environmental impact of resource usage.	Minor	New	By renewal audit 2029
2025:9.5- TCC does not have the full range of systems to identify, prevent and manage risks of corruption and fraud in the organisation	Minor	New	By renewal audit 2029
Total Number of open Weaknesses	21		

6. Lead auditor recommendation

INDEPENDENT VERIFICATION

In our opinion, TCC demonstrates a high/low level of commitment to the Core Humanitarian Standard on Quality and Accountability and its inclusion in the Independent Verification scheme is justified.

<p>Name and signature of lead auditor:</p> <p>Johnny O'Regan</p> <p><i>Johnny O'Regan</i></p>	<p>Date and place:</p> <p>Dublin 19/2/26</p>
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7. HQAI decision

<p>Registration in the Independent Verification Scheme:</p>	<p><input checked="" type="checkbox"/> Accepted <input type="checkbox"/> Refused</p>
<p>Next audit before: 2029/03/02</p>	
<p>Name and signature of HQAI Head of Quality Assurance:</p> <p>Victoria Lyon Dean</p> <p><i>Victoria Lyon Dean</i></p>	<p>Date and place:</p> <p>Geneva, 02nd March 2026.</p>

8. Acknowledgement of the report by the organisation

<p>Space reserved for the organisation</p>	
<p>Any reservations regarding the audit findings and/or any remarks regarding the behaviour of the HQAI audit team:</p> <p><i>If yes, please give details:</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Acknowledgement and Acceptance of Findings:</p> <p>I acknowledge and understand the findings of the audit</p> <p>I accept the findings of the audit</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Name and signature of the organisation's representative:</p> <p><i>Rafat Sabbarz General Director</i></p> <p><i>On behalf of Osema Zamil</i></p> <p><i>[Signature]</i></p>	<p>Date and place:</p> <p><i>Ramatz 10-5-202</i></p>



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

* Scoring Scale from the CHSA Verification Scheme 2020