

TEARFUND CHS Mid-term Audit Mid-term Audit Report TEARFUND-MTA-2018-005

Date: 2018-07-13

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1. General information

Organisation				
Туре	Membership/Network		ternationa derated irough pa	
Mandate	🛛 Humanitarian 🛛 🛛	Devel	opment	Advocacy
Verified Mandate(s)	🛛 Humanitarian 🛛 🛛	Devel	opment	Advocacy
		1		
Size	 UK remote visit 4 programme sites: 3 in Ethiopia and 1 in Kenya 2 partners: one international (Food for the Hungry-FH) and one national (Ethiopian Kale Heywet Church-EKHC) 	onya Sampling Rate Sale		2 country programmes: Ethiopia and Kenya
Lead auditor	Sylvie Robert		cond Iditor	Andrew Nzimbi
		Others		/
	Head Office		Programme Site(s)	
Location	UK remote visit			Ethiopia, Kenya
Dates	13-16, 22, 29 March 2018		18 March-13 April	

2. Schedule summary

2.1 Verification Schedule

Name of Programme sites/members/par tners verified	Location	Mandate (Humanitarian, Development, Advocacy)	Number of projects visited	Type of projects
Kenya	Marsabit	Humanitarian	1	Emergency response/ Cash Transfer, Nutrition and WASH
Ethiopia	Nazreth/ Adama	Development	1	Church and Community Mobilisation (CCM)
Ethiopia	Dessie/ Haik	Development	1	WASH Project
Ethiopia	Dillo	Humanitarian	1	Emergency response/ Cash Transfer

2.2 Opening and closing meetings

2.2.1 Remote visit of Head Office:

	Opening meeting	Closing meeting
Date	13 March	19 April
Location	UK remote	UK remote
Number of participants	5	7
Any substantive issue	The Mid-term audit reviews all 9 CHS commitments (not only the CARs from the initial audit) The Mid-term audit report is public	Organising the field visits for the audit proved to be challenging Too many audit focal points Timing for visits in-country (3 days) is too tight

	Opening meeting	Closing meeting
Date	19 March	23 March
Location	Nairobi, Kenya	Nairobi, Kenya
Number of participants	5	3
Date	20 March	23 March
Location	Marsabit, Kenya	Marsabit, Kenya
Number of participants	5	5
Date	26 March	29 March
Location	Addis Ababa, Ethiopia	Addis Ababa, Ethiopia
Number of participants	4	6

222 On-site visits at Programme Site(s):

3. Recommendation

In our opinion, TEARFUND has implemented the necessary actions to close the minor CARs identified in the previous audit and continues to conform with the requirements of the Core Humanitarian Standard. We recommend maintenance of certification.

Detailed findings are laid out in the rest of this report.

Lead Auditor's Name and Signature

Febel

Sylvie Robert Date and Place: 29 May 2018 Addis Ababa

4. HQAI Quality Control

Quality Control by	Elissa Goucem	
Follow up		
First Draft	2018-05-29	
Final Draft	2018-06-29	

5. Background information on the organisation

5.1 General

Tearfund UK was created in 1968 by the Evangelical Alliance as a response to the Biafra civil war in Nigeria. Tearfund undertakes long-term development work to address the causes of poverty, disaster response activities to reduce death and suffering caused by disasters and conflict, and advocacy to address the underlying causes of poverty and influence those who can change policies and actions affecting the poor. Tearfund is a member of the Disaster Emergency Committee (DEC) in the UK, which launches and coordinates responses to major disasters overseas including through appeals to the public. Tearfund works with the Integral Alliance, a grouping of 22 international Christian NGOs with a focus on coordinating disaster responses.

Tearfund has three key global approaches in how it works:

- Advocacy and influencing
- Community development
- Humanitarian response (to emergencies and conflict)

In order to achieve greatest transformative effect, Tearfund has identified three corporate priorities:

- Church and community transformation
- Work in fragile states
- Environmental and economic sustainability.

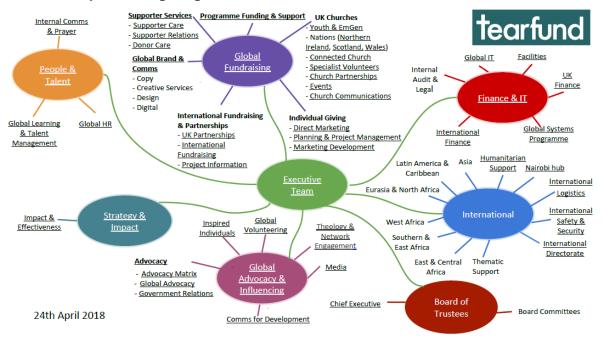
Tearfund has particular expertise in:

- Water, sanitation, and hygiene (WASH)
- Livelihoods
- Disaster Risk Reduction and Resilience
- Food security
- Environmental and economic sustainability
- Tackling sexual and gender based violence
- Cash programming
- Protection
- Shelter
- Peacebuilding

In 2008 Tearfund agreed on 12 Quality Standards in order to support the practical application of good practice. Since 2016, Tearfund has been in the process of reviewing and updating its Quality Standards, in order to make sure they continue to reflect its priorities and commitments. The new set of Quality Standards is comprised of 8 Quality Standards, covering: Behaviours, Impartiality & Targeting, Accountability, Gender, Empowerment, Technical Quality, Resilience and Protection. Pilot trainings were conducted in 2017 and dissemination is about to start throughout the organisation.

5.2 Organisational structure and management system

Since the initial audit, Tearfund has undertaken an organisational review which resulted in a significant global reorganisation process combining a decentralisation and regionalisation approach. This review will in the short term have important implications on the organisation's systems and staff.



Tearfund Updated Organogram

Tearfund in Ethiopia

Tearfund works in Ethiopia since the 1970s. Along with Tearfund in-country partners, the organisation has supported the establishment and development of more than 20,000 Self-Help Groups across 50 locations in Ethiopia.

In response to the drought in Ethiopia which started in 2016, Tearfund is collaborating with Kale Heywet Church (EKHC) to provide emergency food assistance. It responded to the drought emergency in 2016 with food, forage and seed distribution to over 70,000 people in Fantalle District. It is now involved in cash transfer in Dillo District.

Tearfund in Kenya

Tearfund works with eight partner organisations in Kenya, mobilising churches to meet the needs of their communities. There is a focus on equipping communities to cope with disasters, developing and maintaining environmental sustainability, and working for peace and reconciliation after conflict.

Tearfund partners are operating in disaster-prone areas and informal urban settlements, mainly through Self-Help Groups (small scale community savings groups) on improved access to local markets.

Tearfund is also currently collaborating with Food For the Hungry (FFH) in the semi-arid regions of northern Kenya to respond to a food crisis.

5.3 Work with Partners

Tearfund is currently working in 50 countries.

As mentioned in the initial audit, Tearfund normally works with local partners and as a faithbased agency it gives priority to strengthening the capacity of local churches. However, in the case of large scale disasters or if local partners have limited capacity, Tearfund may decide (via a formal decision-making process, in accordance with its Emergency Response Procedures) to set up an operational programme or respond through pre-positioned relationships with international partners as for example in Kenya with the emergency response to the drought. When Tearfund works with an international partner, it is generally with an International Non-Governmental Organisation (INGO) within one of Tearfund networks, primarily the Integral Alliance, within which Tearfund has pre-agreements with other INGOs.

The Country Representative (or Deputy Country Director) has primary responsibility for the relationship with partner organisations in their country and ensuring that the level of support is adequate to implement the joint Tearfund/Partner strategy.

There are 5 main stages in Tearfund's partnership cycle:

- Identifying partnerships that fulfil Tearfund's partnership criteria and which satisfy certain governance and capability requirements;
- Negotiating and approving partnership agreements including visits and risk assessments;
- Managing and monitoring partnerships including handling issues, ongoing risk assessments and capacity checks;
- Reviewing partnerships to assist with learning, openness and to re-evaluate whether the partnership still fits with both the partner's and Tearfund's current strategy;
- Exit from partnerships.

5.4 Certification or verification history

Tearfund received the CHS certification in March 2016. The Initial audit field programme site was in the Philippines.

A maintenance audit was conducted in March 2017 which focused on the 6 nonconformities identified in the previous audit report. The report conclusions were that Tearfund had taken action to close its non-conformities, which led to the closing of one CAR while the others remained in resolution.

6. Sampling

6.1 Rationale for sampling

A review of the totality of Tearfund country programme offices led to the short listing of three countries – Ethiopia and Zimbabwe, with Kenya as a back-up option - that offered a fair picture of Tearfund's activities and ways of operating and would allow a visit within the timeframes established for the audit.

Based on Tearfund feedback the auditors finally selected **Ethiopia and Kenya** for visits. The country programme in Ethiopia represented significant funding, through work with partners. The country programme in Kenya represented significant funding as well and offered more diversity in terms of the type of relationships with partners.

Projects in each country were selected in order to provide information on both the development and the humanitarian responses. Nevertheless, the Kenya emergency response project was not accessible due to the exceptional weather conditions (heavy rains) in Kenya during the visit, so it had to be rescheduled and was finally conducted at a different emergency response project in Ethiopia.

Disclaimer:

It is important to note that the audit findings are based on the results of a sample of the organisation's documentation and systems as well as interviews and focus groups with a sample of staff, partners, communities and other relevant stakeholders. Findings are analysed to determine the organisation's systematic approach and application of all aspects of the CHS across its organisation and to its different contexts and ways of working.

6.2 Interviews:

Position of interviewees	Number of interviewees
Head Office (UK)	20
Programme site(s)	
Ethiopia	7 Tearfund staff + 9 partners staff
Kenya	4 Tearfund staff + 10 partners staff
Total number of interviews	50

6.2.1 Semi-structured interviews (individual interviews or with a small group <6

6.2.2 Focus Group Discussions (interviews with a group >6)

Type of Group		Number of participants	
	Female	Male	
Ethiopia (first visit)			
Women group of 10 persons (Self Help Groups/Cluster Level Associations)	10		
Women group (Self Help Groups/Cluster Level Associations)	11		
Mixed group of 11 persons (Self Help Groups/Cluster Level Associations)	5	6	
Mixed group of 15 persons (water committee)	3	12	
Ethiopia (second visit)			
Mixed group of 8 persons (committee)	2	6	
Men group of 8 persons (emergency response beneficiaries)		8	
Women group of 20 persons (emergency response beneficiaries)			
Total number of participants	51	32	

7. Report

7.1 Overall organisational performance

Tearfund's partnership approach and investment in long term development provide strong roots for resilience. Tearfund staff show high commitment and hold strong values with relation to serving the most vulnerable. The organisation has tools in place to ensure the quality and accountability of its programmes and projects, including for the partners it supports and works with. Tearfund policies are in place to ensure accountability, such as the Personal Conduct Policy, the Code of Conduct, a Whistleblowing Policy and a Safeguarding Policy.

Communities' empowerment

Tearfund shows a long-standing approach to empowering communities towards resilience. The organisation has a strong commitment to people, staff and partners. Communities are positive about the programmes or projects they benefit and the way those are delivered.

Partnership

The organisation has not yet come to terms with dilemmas such as whether or not to interfere with partners' practices, and how to reconcile the autonomy given to partners in managing programmes and Tearfund commitment to principled intervention. This sometimes leads to situations where the implementation by the partners may put Tearfund commitments at risk.

Timeliness of emergency response

While Tearfund's approach through partners enforces ownership and empowerment in development contexts, it might sometimes have negative effects, in particular in the context of emergency responses. Identifying and equipping the partner with specific skills, for example cash transfer technical aspects, takes time and this can have an impact on the timeliness of emergency interventions. Combined with weak ongoing monitoring of changes in context and needs, this may lead to serious issues in the delivery of adequate programmes.

Accountability to beneficiaries

Tearfund has a strong organisational global commitment towards quality and accountability, which is reflected in its recently revised set of Quality and Accountability Standards. Tearfund's work through partners implies strong delegation on these aspects, which combined with weaknesses in the ongoing monitoring and due diligence processes, can sometimes put Tearfund's commitment to accountability to communities at stake.

Tearfund approach to staff and partners' capacity building

Tearfund aims at building its staff and partners' capacities and supports them throughout the programme and project management cycle. Nevertheless, its approach to capacity building of staff and partners is not necessarily based on sound capacity assessments and do not always tackle the root causes of gaps in a sustainable way.

7.2 Status of the Corrective Action Requests of the previous audit

Corrective Action Requests /Weaknesses	Туре	Original deadline for resolution	Status of CAR
2016 - CAR 2.2a As illustrated by the Philippines response, decisions are not systematically made without unnecessary delays	Minor	2 years (March 2018)	Closed
2016 - CAR 5.1 Communities are not systematically consulted on the design, implementation or monitoring of complaints handling processes	Minor	2 years (March 2018)	Closed
2016 - CAR 5.6 Communities and people affected by crisis are not systematically made aware of the expected behaviour of staff, particularly commitments on the prevention of sexual exploitation and abuse	Minor	2 years (March 2018)	Closed
2016 - CAR 6.6 Tearfund's partnership agreements do not fully reflect each partner's capacities and constraints	Minor	2 years (March 2018)	Closed
2016 - CAR 9.1 As illustrated by the Philippines response, programmes are not always designed and implemented as efficiently as possible	Minor	2 years (March 2018)	Closed

7.3 Summary of Corrective Action Requests of the mid-term audit

Corrective Action Requests /Weaknesses	Туре	Status of CAR/Weaknesses	Time for resolution
2018 - CAR 1.3 Projects are not timely adapted to changes in contexts and needs.	Minor	New	2 years
2018 - CAR 2.2 Tearfund does not ensure that the delivery of its humanitarian response is timely.	Minor	New	2 years
2018 - CAR 5.1 Communities and people affected by crisis are not systematically consulted on the design and the monitoring of complaints handling processes.	Minor	New	1 year
2018 - CAR 5.3 Tearfund does not ensure that complaints are systematically managed in an appropriate manner that prioritises the safety of the complainants and those affected at all stages.	Minor	New	1 year
2018 - CAR 8.4 Tearfund does not ensure a systematic assessment and follow up of its staff and partners' management capacities and capability to adequately deliver programmes.	Minor	New	2 years
2018 - CAR 8.9 Tearfund and partner staff do not systematically implement basic security rules nor apply agreed sanctions over breaches.	Minor	New	2 years
		TOTAL Number	6

7.4 Strong points and areas for improvement:

Commitment 1: Humanitarian assistance is appropriate and relevant

Score: 2,1

Tearfund has a strong commitment to impartiality which is reflected at both policy and field levels from the assessment stage throughout the project management, and Tearfund policies reflect the diversity of communities. Policies and processes are in place to ensure an appropriate understanding of the environment (context and people) where the projects are conducted.

However, ongoing monitoring of changes in the environment at field level is not as thorough as it should be to reflect changes in the context and needs. Therefore, the timely adaptation of programmes to changing needs, capacities and context is sometimes at stake, especially for emergency response.

Commitment 2: Humanitarian response is effective and timely

Score: 2

Tearfund programme commitments are in line with its organisational capacities. Tearfund policies and programme commitments towards monitoring and evaluation are reflected in its monitoring and evaluation projects' activities at field level, although the organisation sometimes faces challenges in ensuring that its partners do implement Monitoring and Evaluation as per their agreements. Technical standards are used and embedded into Tearfund's new set of Quality and Accountability standards.

The identification of constraints and their analysis for the design of the early stages of interventions is a challenge in some programmes. For example, Tearfund partners sometimes face significant challenges in identifying and recruiting competent staff to deliver programmes. As a result the delivery of the humanitarian responses is not always timely. Communities at project sites confirmed this challenge, and its impact on the timeliness and appropriateness of the humanitarian response projects aimed at supporting them during the droughts in East Africa.

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

Score: 3

Tearfund is highly committed to improving the resilience of communities and people affected by crisis through long-term positive effects and reducing the risk of dependency. Tearfund's global approach to empower and strengthen local capacities is strongly reflected in its systems, policies, strategies and guidance as well as throughout its programmes and project management, from the initial assessment until the lessons learned final phase. Tearfund programmes aim at promoting early disaster recovery and benefiting the local economy.

Tearfund has embedded in its systems appropriate mechanisms to identify unintended effects, including Sexual Exploitation and Abuse. However, the full delegation of the complaints mechanisms to Tearfund partners, with limited reporting back requirements to Tearfund, may not allow Tearfund to have a full picture of the communities' feedback and complaints. Furthermore, in some contexts Tearfund partners' staff are not all aware of what could be potential or actual unintended negative effects of the projects.

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



Communities' participation throughout Tearfund's programmes and project management is a strong principle within the organisation's approach. Tearfund's communication policies as well as the way the organisation is managing communications with its partners and communities are accurate. However, there are no dissemination strategies in place to guide Tearfund staff and partners and ensure that appropriate tools fitting the communities' specificities are available and shared. A culture of open communication is in place in a visible and active way. Communities' engagement is high and open and participation is inclusive. However the conditions to provide feedback to Tearfund partners are not always optimal, neither is this feedback provided directly or reported to Tearfund.

Communities at project sites raised that the communication of important information about the projects had not always been ensured by Tearfund partners.

Commitment 5: Complaints are welcomed and addressed

Score: 1,8

Tearfund has a strong organisational commitment towards accountability to beneficiaries which is reflected into its complaints' procedures and mechanisms throughout its programmes and project management. However, while communities and people affected by crisis are participating in the implementation of the complaints mechanisms, they are not systematically consulted on the design and the monitoring of complaints handling processes. Therefore tools provided to communities are not always fully appropriate to cultures and contexts. As a result Tearfund does not ensure that complaints are always managed in an appropriate manner and the system does not always ensure total safety of the complainant and those affected. Finally, as Tearfund partners are in charge of the complaints management, Tearfund is not receiving a full picture about the mechanism and the complaints raised.

Tearfund is committed to ensure that communities are aware of the expected behaviour of staff, and reflects this commitment through its Quality Standards (QS) trainings for Tearfund and partners' staff. Generally, communities and people affected by crisis confirm that they are aware of the expected behaviour of Tearfund and partners' staff, although some community members in remote areas reported that they were not specifically made aware of this requirement.

Commitment 6: Humanitarian response is coordinated and complementary

Score: 3,1

Tearfund policies and strategies commit to coordination and collaboration with others, including international and national actors, as well as local authorities. Tearfund staff and partners share information and participate in relevant bodies to enable complementarity and coordination at all levels. Tearfund partners are clearly engaged with local authorities at the project sites.

Tearfund's intent to work with the poorest communities translates into a thorough poverty and needs analysis while determining areas of intervention as well as potential partners. As a result, linkages are initiated with other stakeholders from the assessment stage. Tearfund mostly works with partners and has procedures and tools in place to conduct their assessment, set up agreements highlighting compliance with Tearfund Quality Standards (QS), and follow up on their achievements.

Commitment 7: Humanitarian actors continuously learn and improve

Score: 2,5

Tearfund commits and contributes to learning and innovation in humanitarian response amongst peers and within the sector. Tearfund has evaluation and learning policies and mechanisms in place to do so. However, those mechanisms are not widely known, and rely on technologies which do not necessarily allow Tearfund country programme staff and its partners, and therefore communities, to access them. This leads to a disconnection between different levels of the organisation in regard to access to the organisation learning tools.

Weaknesses in the time management of learning activities do not always allow for the effective use of learning in the design of new programmes or projects. Furthermore, weaknesses in the community level complaints and feedback mechanisms are not systematically generating the learning for which Tearfund strives.

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

Score: 2,2

Tearfund staff works according to the mandate and values of the organisation and to agreed objectives and performance standards and the organisation staff policies and procedures are fair, transparent, non-discriminatory and compliant with local employment law.

Tearfund aims to support its staff and partners in order to ensure their capacity and capability to deliver programmes. However, the headquarters support to in-country staff is sometimes provided in a way that does not necessarily address structural gaps in capacity. Tearfund does not ensure a systematic assessment and follow up of its staff and partners' management capacities and capability to adequately deliver programmes.

Most Tearfund staff are not aware of the organisation's international review and new strategy and its implications for staff and their work in the near future.

Tearfund ensures that partners have relevant policies in place within its partners' organizational assessments. However, partner field staff are not all aware of their organisational Code of Conduct and at Project Sites the partners' staff have not systematically signed their organisational Code of Conduct.

Finally, although Tearfund has policies in place to ensure security, its staff and partners do not systematically implement nor respect basic security rules, and sanctions for breaches are not applied.

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

Score: 2,7

Tearfund policies and processes governing the use and management of resources are in place, including monitoring and reporting on expenditures.

However, the efficiency of competitive bidding processes in Tearfund's programmes are sometimes at stake and there are vulnerable points in the guidance on procurement thresholds, which could lead to waste on small expenditures.

The risk of corruption is managed although the inadequate functioning of the complaints mechanisms is a risk area since it might not reliably capture reports of corruption cases, specifically in Cash Transfer projects.

The impact of projects on the environment is considered by the organisation which shows specific involvement in environmental conservation activities. However Tearfund does not have waste management plans in its programmes.

8. Organisation's report approval

Acknowledgement and Acceptance of Findings

For Organisation representative - please cross where appropriate

I acknowledge and understand the findings of the audit	\boxtimes
I accept the findings of the audit	\boxtimes
I do not accept some/all of the findings of the audit	

Please list the requirements whose findings you do not accept

Name and Signature

Date and Place

And M

Nigel Harris Chief Executive Officer Tearfund

23 July 2018 London, UK

2018-07-13

9. HQAI's decision

Certification Decision				
Certificate:				
Maintained Suspended	 Reinstated Withdrawn 			
Next audits Second Maintenance audit before: 2019-03-20				
Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative				

Appeal

In case of disagreement with the conclusions of the report and/or decision on certification, the organisation can appeal to HQAI within 30 days after the final report has been transmitted to the organisation.

HQAI will investigate the content of the appeal and propose a solution within 15 days after receiving the appeal.

If the solution is deemed not to be satisfactory, the organisation can inform in writing HQAI within 15 days after being informed of the proposed solution of their intention to maintain the appeal.

HQAI will take action immediately, and identify two Board members to proceed with the appeal. These will have 30 day to address it. Their decision will be final.

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

Annex 1: Explanation of the scoring scale

A score of 0 denotes a weakness that is so significant that it indicates that the organisation is unable to meet the required commitment. This is a major weakness to be corrected immediately. EXAMPLES: • Operational activities and actions contradict the intent of a CHS commitment. Policies and procedures contradict the intent of the CHS commitment. Absence of processes or policies necessary to ensure compliance at the level of the commitment. 0 • Recurrent failure to implement the necessary actions at operational level make it impossible for the organisation to ensure compliance at the level of the commitment. · Failure to implement to resolve minor non-conformities in the adequate timeframes More than half of the indicators of one commitment receive a score of 1 (minor non-conformity), making it impossible for the organisation to ensure compliance at the level of the commitment. A score of 1 denotes 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 the commitment. EXAMPLES: There are a significant number of cases where the design and management of programmes and activities do not reflect the CHS requirement. Actions at the operational level are not systematically implemented in accordance with relevant policies and procedures. Relevant policies exist but are incomplete or do not cover all areas of the requirement/commitment. Existing policies are not accompanied with sufficient guidance to support a systematic and robust implementation by staff. A significant number of relevant staff at Head Office and/or field levels are not familiar with the policies and procedures. Absence of mechanisms to monitor the systematic application of relevant policies and procedures at the level of the requirement/commitment. A score of 2 denotes an issue that deserve attention but does not currently compromise the conformity with the requirement.. This is worth an observation and, if not addressed may turn into a significant weakness (score 1). EXAMPLES: • Implementation of the requirement varies from programme to programme and is driven by people rather than organisational culture. • There are instances of actions at operational level where the design or management of programmes does not fully reflect relevant policies. Relevant policies exist but are incomplete or do not cover all areas of the requirement/commitment. The organisation conforms with this requirement, and organisational systems ensure that it is met throughout the organisation and over time. EXAMPLES: Relevant policies and procedures exist and are accompanied with guidance to support implementation by staff. • Staff are familiar with relevant policies. They can provide several examples of consistent application in different 3 activities, projects and programmes. • The organisation monitors the implementation of its policies and supports the staff in doing so at operational level. Policy and practice are aligned.

4	The organisation demonstrates innovation in the application of this requirement/commitment. It is applied in an exemplary way across the organisation and organisational systems ensure high quality is maintained across the organisation and over time.
	EXAMPLES:
	• Field and programme staff act frequently in a way that goes beyond CHS requirement to which they are clearly committed.
	• Relevant staff can explain in which way their activities are in line with the requirement and can provide several examples of implementation in different sites. They can relate the examples to improved quality of the projects and their deliveries.
	• Communities and other external stakeholders are particularly satisfied with the work of the organisation in relation to the requirement.
	• Policies and procedures go beyond the intent of the CHS requirement, are innovative and systematically implemented across the organisation.
5	On top of demonstrating conformity and innovation, the organisation receives outstanding feedback from communities and people. This is an exceptional strength and a score of 5 should only be attributed in exceptional circumstances
	EXAMPLES:
	• Actions at all levels and across the organisation go far beyond the intent of the relevant CHS requirement and could serve as textbook examples of ultimate good practice.
	• Policies and procedures go far beyond the intent of the CHS requirement and could serve as textbook examples of relevant policies and procedures.