

# Developmental Action Without Borders – NABA'A Renewal Audit – Summary Report – 2022/09/30

## 1. General information

### 1.1 Organisation

Type	Mandates	Verified
<input type="checkbox"/> International <input checked="" type="checkbox"/> National <input type="checkbox"/> Membership/Network <input checked="" type="checkbox"/> Direct Assistance <input type="checkbox"/> Federated <input checked="" type="checkbox"/> With partners	<input checked="" type="checkbox"/> Humanitarian <input checked="" type="checkbox"/> Development <input checked="" type="checkbox"/> Advocacy	<input checked="" type="checkbox"/> Humanitarian <input checked="" type="checkbox"/> Development <input checked="" type="checkbox"/> Advocacy
<b>Legal registration</b>	NNGO	
<b>Head Office location</b>	Saida, Lebanon	
<b>Total number of organisation staff</b>	170 staff, 34 volunteers	

### 1.2 Audit team

<b>Lead auditor</b>	Jordi Capdevila
<b>Second auditor</b>	Désirée Walter
<b>Third auditor</b>	
<b>Observer</b>	
<b>Expert</b>	
<b>Witness / other participants</b>	

### 1.3 Scope of the audit

<b>CHS Verification Scheme</b>	Certification
<b>Audit cycle</b>	Third
<b>Coverage of the audit</b>	The entire organisation

### 1.4 Sampling\*

<b>Total number of Country Project sites included in the sampling</b>			11
<b>Total number of sites for onsite visit</b>			3
<b>Total number of sites for remote assessment</b>			0
Name of Country project site	Included in final sample (Y/N)	Rationale for sampling and selection / de-selection decision	Onsite or Remote
<b>Random sampling</b>			
#4.- Strengthen the resilience of youth without and with disabilities in Lebanon	N	Randomly selected and replaced by #7, since #4 was sampled during the Maintenance Audit MA2021.	
#2.- Supporting vulnerable girls & Boys to access & remain in education in Lebanon	N	Randomly selected and replaced by #11, since #2 was sampled during the Maintenance Audit MA2021.	
#3.- Youth empowerment	Y	Randomly selected and maintained in the sample because the focus of the project contributes to the diversity of the	Onsite

		sample. It also ensures inclusion of projects not delivered through Naba'a Community Centres. Direct implementation. Number of beneficiaries is relatively low, budget is average compared to others.	
#7.- Strengthening community-based child protection, Gender Based violence interventions, and psychosocial support in Palestinian camps	Y	Randomly selected and next in line to replace #4. Maintained in the sample because the focus of the project contributes to the diversity of the sample. The project includes activities inside and outside Naba'a Community Centres. Direct implementation within a consortium. High number of beneficiaries, budget is relatively low compared to other projects.	Onsite
<b>Purposive sampling</b>			
#11.- Provision of Basic Food and WASH Needs for the most vulnerable Sheltering in Palestinian Refugees Camps		Purposely selected to replace #2, to ensure presence of humanitarian assistance projects, and contributes to the diversity of the sample, including geographical diversity across the country.	Onsite
<b>Any other sampling performed for this audit:</b>			
<p>For the selection of samples, the auditors took into consideration aspects such as mandates (Advocacy, Development, and Humanitarian), size of the project, geographical distribution, and diversity of partners. We have considered all the available evidence presented to us during the audit and have used the information provided by the six previous audit reports.</p>			
<b>Sampling risks identified:</b>			
<p>Due to the COVID-19 pandemic and associated travel restrictions, the Recertification Audit (RC2020) and the Maintenance Audit (MA2021) were conducted remotely. Both audit reports recommended to organise on-site visits including community discussions at the next audit.</p> <p>To balance the limitations inherent to the exclusive use of remote auditing techniques since 2020, this audit chose site visits for all three projects. Community members were selected directly by Naba'a, amongst communities who were involved in sampled projects. The sampling recommendations from the RA also highlighted that there should be a stronger focus on communities outside of the scope of the Naba'a centres, as well as the inclusion of community development committees' members. These recommendations have been adopted for this audit.</p> <p>Naba'a has demonstrated continuous improvement over the previous cycles of certification. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusions and recommendation.</p>			

*\*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 Locations Assessed

Locations	Dates	Onsite or remote
Naba'a Head office, Saida, Lebanon	04-05/07/2022 and 08/07/2022	onsite
Project site, Cheba'a municipality, Lebanon	06/07/2022	onsite
Project site, Ein El-Helwe Camp, Lebanon	07/07/2022	onsite
Project site, Borj Al Chamali Camp, Lebanon	07/07/2022	onsite

## 2.2 Interviews

Level / Position of interviewees	Number of interviewees		Onsite/ Remote
	Female	Male	
<b>Head Office</b>			<b>O/R</b>
Management	2	6	onsite
Staff	1	2	onsite
<b>Project Sites</b>			
Management	1	0	remote
Staff	4	1	onsite
Partner staff	1	2	onsite
Others			
<b>Total number of interviewees</b>	<b>9</b>	<b>11</b>	

## 2.3 Consultations with communities

Type of group and location	Number of participants		Onsite or remote
	Female	Male	
Youth participating in project #3, Cheba'a	6	4	onsite
Parent and youth participating in project #3, Cheba'a	0	2	onsite
Adults participating in project #11, Ein El-Helwe Camp	1	1	onsite
Women participating in project #7, Ein El-Helwe Camp	11	0	onsite
Children participating in project #7, Borj Al Chamali Camp	6	3	onsite
<b>Total number of participants</b>	<b>24</b>	<b>10</b>	

## 2.4 Opening meeting

<b>Date</b>	2022/07/04
<b>Location</b>	Saida, Lebanon
<b>Number of participants</b>	14 (6 female, 8 male)
<b>Any substantive issues arising</b>	none

## 2.5 Closing meeting

<b>Date</b>	2022/07/28
<b>Location</b>	Saida, Lebanon (remote)
<b>Number of participants</b>	7 (3 female, 4 male)
<b>Any substantive issues arising</b>	none

### 3. Background information on the organisation

#### 3.1 General information

Naba'a – Development without Borders (Naba'a) is a Lebanese non-political, not-for-profit organisation that works with Palestinian and Lebanese communities. Naba'a was founded in 2001 and is registered in Lebanon as a child-right-based organisation (registration number 104/AD).

Naba'a's mission is to empower communities to uphold child rights and enable children and youth to play a healthy and active role within their communities. With this vision of empowerment Naba'a conducts its activities in Naba'a Community Centres, which are in the vicinity of the United Nations Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) premises, and in municipalities or informal gatherings across the country. Naba'a has projects in humanitarian response, development, and advocacy, all of them are cross-cutting on child rights.

Naba'a is committed to the humanitarian principles, abides by the United Nations (UN) Conventions of the Rights of the Child and 6 Core Principles of the UN Inter-Agency Standing Committee (IASC), and is guided by the needs of communities and people affected by crisis without discrimination.

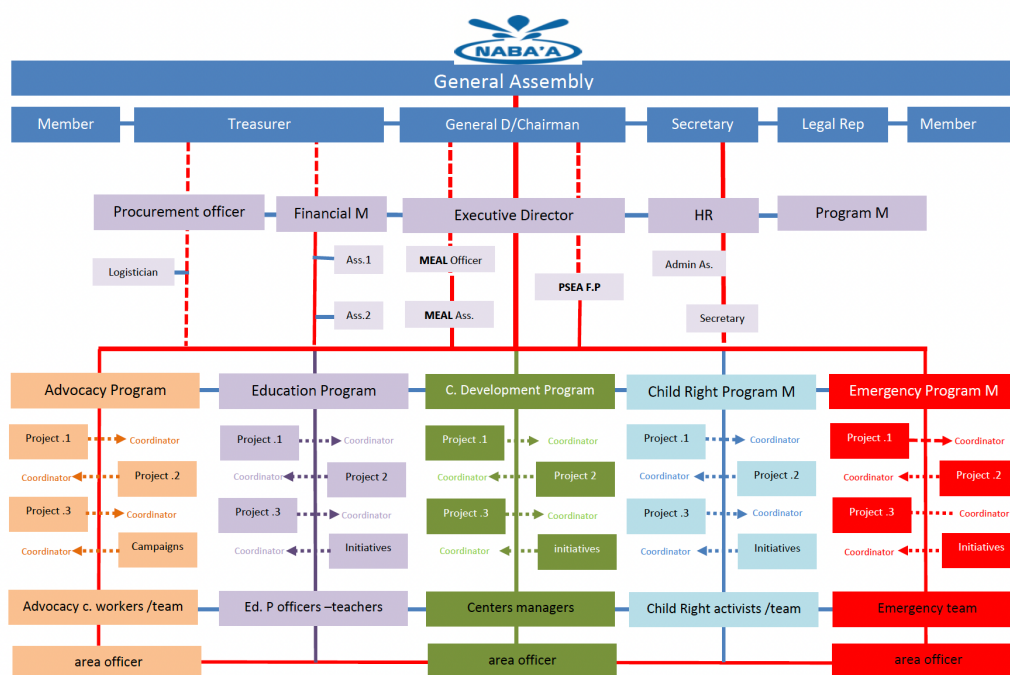
Naba'a is an implementing organisation mostly receiving sub-grants from other entities such as UN bodies, International Non-Governmental Organisations (INGOs) and Pool Funds. Naba'a's Senior Management Team (SMT) and the Board of Directors (BoD) assess risks applicable to all its programmes, review grant opportunities and potential donors, and issue recommendations regarding whether to pursue a grant or decline it. This practice is however not systematized through a specific screening procedure or process. While Naba'a is extensively engaged on the Lebanese territory, it also manages the MANARA network, a regional child rights network of civil society organisations in the MENA region, which it legally represents and hosts. Naba'a is member of the Core Humanitarian Standard (CHS) Alliance.

#### 3.2 Governance and management structure

Naba'a's BoD is the highest decision-making authority body. It has six members, and it is chaired by Naba'a's General Director (GD). The BoD has general oversight over risk management, funding, financial control and management, as well as organisational capacity. It is involved in selected operational activities (e.g. to sign employment contracts) and central issues such as complaint handling, where Naba'a's complaint monitoring committee has direct access to the BoD. In case of sensitive complaints falling outside Naba'a scope, the GD is responsible for referral. At Head Office, the Executive Director (ED) holds the global leadership of the organisation. With support from the SMT they are in charge of operations and provides updated information to the BoD. The organisation has currently 170 staff members, as well as 34 volunteers.

Naba'a is still working to the 2015-2020 strategy with a focus on the development of long-term positive effects in the communities. This approach reflects Naba'a's vision to engage communities in decision-making processes, which they do at all stages of their work. Naba'a identifies six progressive levels of involvement and participation: information, listening & learning, joint assessment, shared decision-making, collaboration, and empowerment. For many projects Naba'a establishes steering committees which include members of the communities and are in charge of information sharing, project oversight, respect of project criteria and monitoring.

Naba'a works on five main programmes, i.e. Advocacy, Education, Community Development, Child Rights and Emergency, which are steered by Programme Managers and their teams. Naba'a implements its projects directly and works through local Lebanese partners such as Civil Society Organisations, as well as internationally through partners from the MANARA network. Naba'a has a horizontal governance structure, where regular, scheduled, and ad hoc meetings involving the BoD, Senior Management, and team members take place to foster informed and effective decision-making. In the event of an emergency response, Naba'a has an Emergency Preparedness Plan (EPP) in place, and its strong partnerships with local and international NGOs, the UN System, authorities, and communities facilitate the reception of timely alerts and the adoption of quick response interventions. Naba'a has a pool of trained staff and volunteers on stand-by who can surge in case of an emergency. Financially, Naba'a has a reserve budget that can be activated within 24 hours and collaborates with donors who have an emergency focus and can provide emergency funds rapidly.



### 3.3 Internal quality assurance mechanisms and risk management

Naba’a’s quality assurance mechanism is implemented through two parallel mechanisms:

- the Customized Monitoring and Internal Audit Tool, a system of auditing and monitoring tools, to be performed by Naba’a-internal peer reviewers (finalised in 2019 but not applied systematically);
- the new MEAL System, a refined tool that was finalised in the beginning of 2022 which is not yet fully rolled-out.

Naba’a’s Monitoring and Internal Audit Tool covers four areas for monitoring and auditing: projects, Community Centres, training, and staff, hence looking at all aspects of Naba’a’s work. The Internal Audit tools provide guidance on monitoring activities to measure project performance and efficiency and include a section to review staff’s understanding, skills and knowledge in view of the objective of the programmes. The new MEAL System commits to systematic, ongoing collection of data. It describes monitoring activities at the beginning, during and at the end of the project and specifies the data collection systems to be used, who is responsible, and how frequently data collection, entry and analysis will take place. Current duplications between the two systems will be eliminated. However, the roll-out of the new MEAL System and its tools is not finalised and MEAL activities not yet implemented systematically for all Naba’a projects.

Naba’a project staff and partners are required to provide monthly, intermediate, and project-end reports. These reports are reviewed and discussed during management meetings and inform quality control. Naba’a Management, Human Resources and supervisors use field visits and observation, spot-checks, internal reports, programme reports as well as tracking sheets to execute their control functions. Naba’a is also controlled by external audits and donor audits.

Naba’a has a project-based approach to risk assessments, including Sexual Exploitation, Abuse and Sexual Harassment (SEAH), contextual, financial, operational, or reputational risks, that are used for project proposals and updated during the project cycle. However, Naba’a does not identify and act upon all potential or actual unintended negative effects in a systematic policy-driven manner. Naba’a’s SMT and BoD exercise a risk-based screening process, applicable to all its programmes. Agreements with partners include that information on relevant safety and security risks be shared with Naba’a.

Naba’a’s commitment to the protection of vulnerable people, including Protection from Sexual Exploitation, Abuse and Sexual Harassment (PSEAH) is outlined in policy documents (e.g. Code of Conduct (CoC), PSEA, anti-harassment, Complaint Handling

Mechanism (CHM)) and addressed through multiple channels, including awareness sessions with communities, staff induction and refresher trainings, staff criminal checks, child friendly PSEAH guides. However, project-related risk assessments do not address SEAH risks specifically.

The Finance department is responsible for the organisation's strategic financial planning and financial monitoring and reporting, in close cooperation with programme staff. Naba'a has in place guidance on the procedures for financial management, budget enforcement, purchases, fixed asset investment and the reporting of financial statements. The organisation works to ensure that funds are spent correctly, transparently and in accordance with applicable laws and regulations. A strong control environment with efficiency measures is consistently applied across the organisation and programmes.

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

Naba'a works with individuals and communities and implements its activities mainly directly, but also with local and international partners. It has strategic relationships with international NGOs and specialised UN agencies, such as UNRWA, and maintains relations with a broad range of other stakeholders, including CSOs, local and country-level inter-agency response platforms and coordination mechanisms. Naba'a coordinates the work and activities of the MANARA network, an advocacy network focusing on child right issues in the Middle East and North Africa. Naba'a relies on its strong networks for assessment, information-sharing, learning, capacity-building, and referral purposes.

Before they start collaboration, Naba'a conducts partner assessments covering areas like CoC, PSEAH, CHM, financial management, participation, feedback and learning, which allow to assess compatibility between both partners, including their commitment to impartiality. Naba'a's Local Partner Selection tool supports the identification of partner capacity gaps and informs capacity building requirements. Naba'a supports local partners to strengthen their capacities in areas such as CHM and PSEAH.

Naba'a's ongoing work with partners is governed by agreements that respect each partner's mandate, obligations, and independence, and recognises their respective constraints and commitments. Partner agreements under the MANARA network establish the commitment to uphold the PSEA and Child Protection policies, and other key aspects such as funding and governance issues, partnership principles, and the possibility of establishing a CHM.

However, Naba'a's work with partner organisations is not fully systematised and does not cover all its commitments sufficiently in-depth. For example, Naba'a does not systematically check its partners' commitment to impartiality, diversity and data disaggregation nor the systematic, objective and ongoing nature of partners' MEAL activities. Partner agreements do not systematically ensure that project design addresses contextual and organisational constraints to be safe for communities, nor do they include reference to the expected staff behaviour standards or the need to abide by Naba'a's CoC. Partner assessments do not require or check the need for consultation with community members regarding their CHM.

Naba'a works closely with local authorities, such as municipalities or Popular committees in the camps, before, during and after projects to ensure access and coordination, while maintaining its own neutrality and impartiality. Naba'a therefore upholds a partnership relation with these stakeholders. Naba'a signs Memoranda of Understanding (MoUs) with local authorities that include core project information at the beginning of each project and provides representatives with information about the principles it adheres to (PSEAH, CoC, staff behaviour, CHM, etc.).

## **4. Overall performance of the organisation**

### **4.1 Effectiveness of the governance, internal quality assurance and risk management of the organisation**

During the previous audit cycle, it was repeatedly noted that Naba'a's quality assurance processes were not fully in place nor consistently applied across all projects. Since then, and as noted in the previous surveillance audit, Naba'a has continued to work to enhance its quality assurance and risk management processes and tools.

Naba'a's Customised Monitoring and Internal Audit Tools continue to be used, but a new MEAL System is being put in place. The new system is set-up to be conducted by an independent MEAL Team – reporting to the General Director – that works cross-cutting across the organisation. The new MEAL team is composed of three persons. However, the



new Roles and Responsibilities have been added to the Job Descriptions of existing staff and the capacity for ongoing, effective, and timely monitoring activities will need to be assessed over time.

The MEAL team will increasingly take over monitoring tasks from the existing Internal Audit Team – a system of 16 Naba'a-internal peer reviewers – and current duplications between the two systems will be eliminated. Naba'a is accompanied by an external consultant in the process.

Naba'a's new MEAL tools are starting to be used, including measuring quantitative and qualitative outputs, collecting positive and negative feedback, monitoring the CHM, and promoting the strengthening of monitoring and follow-up mechanisms in order to address poor performance. However, the roll-out of the new MEAL System and its tools is not finalised and MEAL activities are not implemented systematically across all Naba'a projects.

Naba'a's Local Partner Selection tool reviews whether partners have monitoring mechanisms, staff and tools in place, and whether field visits and spot checks are carried out by project management.

Concerning Naba'a's risk management approach, the organisation has a corporate risk matrix including contextual, financial, operational, organisational, and reputational risks, but it is not systematically updated. Contextual risks identified in the Safety and Security Policy and Plan and its Emergency Preparedness Plan (EPP) are regularly updated. The senior management team is in charge of implementing risk assessments and provides updated information to the BoD. The BoD exercises general oversight over risk management. At Project level, identification of risks is systematically performed and updated.

A strong financial control environment with efficiency measures is consistently applied across the organisation and programmes, including detective (e.g. financial monitoring, financial spot checks, and external audits) and corrective controls (e.g. disciplinary procedures). Regarding preventive measures, the organisation operates with a segregation of duties to prevent misuse of funds. However, Naba'a's Manual of Financial procedures does not establish a clear definition of the segregation of duties in order to increase transparency and control. Naba'a's is currently developing a draft procurement policy addressing this issue and establishing responsibilities for authorization. A consultant supporting the Department of Finance conducts financial monitoring activities, including spot checks on aspects related to financial management and procurement practices. Naba'a undergoes an annual external audit to independently assess the accuracy and reliability of its financial management systems.

Staff follow regular refresher training regarding Naba'a's commitments to accountability and safeguarding.

#### **4.2 Level of implementation of the CHS and progress on compliance**

Naba'a remains committed to the application of the CHS across the entire organisation and its activities, including in projects implemented with partners. It continues to demonstrate good performance in areas such as understanding the context and the stakeholders; ensuring that programme and project design responds to the needs of the communities in an appropriate and relevant manner; capacity to react to sudden emergencies; building assistance based on local capacity; strengthening resilience of the communities and developing local capacities. Naba'a has a strong approach to localisation, working closely with communities, local authorities and local CSOs. It is also an active contributor to networks and coordination fora, especially concerning child rights.

The organisation is perceived by both staff and communities as an efficient organisation, impartial, transparent and supportive. Staff continue to express pride in working with Naba'a, in an organisation that develops their capacities, with an accessible, horizontal management structure.

In the previous audit (MA2021), a minor CAR was issued noting that the communities were not consulted on the design, implementation, and monitoring of the complaint handling mechanism. Since then, Naba'a has continued to raise awareness about its CHM through its two PSEA focal points. Naba'a has recently completed awareness sessions for 15,000 community members and stakeholders. The organisation regularly explains the existing complaints mechanism to the communities it works with, including questions regarding its design and applicability. Staff systematically discuss the CHM with the communities during initial orientation and review meetings, as well as during project activities. This progress justifies the closure of the standing minor CAR.

Nonetheless, there are some areas where Naba'a's performance has decreased or presents weaknesses. The areas of concern are as follows: lack of systematic MEAL activities across all projects, in part due to the current adoption of the new MEAL system which is not fully rolled out; lack of data management procedures to ensure the safeguarding of personal information; CHM guidance and procedures not clearly detailing the scope of the CHM; lack of guidance or procedure to identify referral pathways and ensure a systematic referral for complaints falling outside Naba'a's CHM scope; and some lack of policies and processes to govern the use and management of resources, including risk management and environmental impact.

Naba'a continues to demonstrate an organisational culture where commitment to safeguarding and PSEAH is taken seriously, in accordance with their CoC, CPP and PSEA Policy. Naba'a ensures that projects take into consideration needs and risks, identify potential negative effects and work with partners to implement strategies and guidance in order to prevent sexual exploitation and abuse. However, project-related risk assessments do not address SEAH risks specifically. A CHM is in place, covering PSEAH amongst other aspects, although its scope is not clearly defined in the CHM Policy. Naba'a's partner assessments check, among other aspects, if they have a CHM.

Naba'a systematically shares information with the communities including expected staff behaviour, PSEAH and the CHM, but it does not have a guidance or procedure establishing the minimum set of information to be shared with communities and other stakeholders. Naba'a is committed to the participation of communities and uses different channels to engage them at all stages of the work, including consultation on CHM design. Staff show a good understanding of Naba'a policies, including PSEA, and understand the consequences of not adhering to them. Naba'a ensures its staff understand the CHM through staff induction and training, as well as frequent refresher training provided by the PSEA focal points.

Naba'a continues to be strongly committed to localisation. Naba'a's policies and procedures, coupled with the deep rooting of the staff in the areas where the organisation works, ensures a good understanding of the context and the different active stakeholders, with project design responding to the needs of the communities, strengthening resilience of the communities, and developing local capacities. Naba'a's strong approach to localisation is also seen through its close partnership with local authorities and local CSOs, as well as international partners. Naba'a works currently with some 30 partners for project implementation.

The communities interviewed are satisfied with Naba'a's approach and activities. Communities describe Naba'a as an association that is non-discriminatory, offering projects that are not covered by other NGOs, with proposed actions adapted to local realities, improving their resilience, and highlighting the beneficial impact of Naba'a projects on the wider community.

Naba'a ensures inclusive representation, participation and engagement of people and communities at all stages of its work. This is achieved by clear policies ensuring impartiality as well as gender and diversity awareness. Naba'a's activities are participatory and inclusive, including a wide range of groups. The communities and staff interviewed confirmed that Naba'a is committed to diversity, provides impartial assistance, and considers gender issues in the design of its programme and staff management.

Staff regulations include a CoC and ensure fair, transparent, non-discriminatory procedures that are compliant with national employment law. The organisation communicates in a way that is respectful, culturally appropriate and takes into consideration the communication needs of vulnerable and marginalised groups.

Naba'a's staff also shows a good diversity in terms of age, nationality, faith, community, and gender.

Naba'a demonstrates a solid combination of frameworks and staff/partner awareness of the importance of data disaggregation, including gender and age, but the organisation does not share its commitment on diversity and data disaggregation with partners, nor does it check the partners' commitment to that matter.



### 4.3 Performance against each CHS Commitment

Commitment	Strong points and areas for improvement	Feedback from communities	Average score*
<b>Commitment 1:</b> Humanitarian assistance is appropriate and relevant	Impartiality and non-discrimination are at the centre of Naba'a's activities as outlined in key policy, strategy, and operational documents. A structure is in place for context analysis, supported by processes and practice. Naba'a conducts well-structured needs and risk assessments and has a thorough understanding of the vulnerabilities and capacities of communities. However, Naba'a does not have a clear procedure to ensure the systematic inclusion of context analysis into project design. Naba'a's approach to data disaggregation is not systematically shared with and required from partners.	Communities describe Naba'a as an association that is non-discriminatory, communicates transparently, and offers projects that are not covered by other NGOs.  Communities confirm that Naba'a asks pro-actively for their needs and know that projects are decided after such needs assessments.	2.8
<b>Commitment 2:</b> Humanitarian response is effective and timely	Naba'a's overall organisational capacity is ensured, and processes in place to provide a timely and effective response or refer needs that cannot be met. Naba'a has a systematic approach to monitoring and evaluation. However, the roll-out of the new MEAL System and its tools is not finalised and MEAL activities not implemented systematically for all Naba'a projects. In addition, Naba'a does not have project design procedures in place to systematically ensure that the proposed action is realistic and safe for communities.	Communities confirm that proposed actions are adapted to local realities.  Interviewed communities explained that they had participated in Naba'a monitoring activities.	2.6
<b>Commitment 3:</b> Humanitarian response strengthens local capacities and avoids negative effects	Naba'a has a strong organisational commitment to Do-No-Harm. Its strong understanding of context and stakeholders, as well as its active collaboration with partners allow for Naba'a to identify and act upon negative effects, although Naba'a does not monitor risks in a systematised manner. Naba'a demonstrates exemplary performance on improving the resilience of local communities and building on local capacities. However, Naba'a does not have data management procedures in place to ensure the safeguarding of personal information.	Community members confirm that projects improve their resilience and highlight the beneficial impact of Naba'a projects on the wider community. They feel safe in Naba'a centres and with Naba'a staff.	2.8
<b>Commitment 4:</b> Humanitarian response is based on communication, participation and feedback	Participation of communities in all stages of the work is reflected in key policies, operational documents, and partner agreements. Naba'a ensures inclusive representation and is actively seeking feedback from communities, using a range of channels to ensure participation of all groups. Communication with communities is transparent, and in languages and formats that are easily understood and appropriate. However, Naba'a has not defined a guidance or procedure on the minimum set of information to be shared with communities and other stakeholders. Naba'a's website is out-of-date and does not provide access to key policies and commitments, hence impacting on the provision of accurate external communication.	Communities feel well informed and perceive Naba'a communication as clear and effective. Some community members had heard of Naba'a before enrolling into any activity and the good reputation attracted them to get involved.  Communities confirm that they contributed to project design, had opportunities to provide feedback and raise concerns during and after the projects. Community members confirm that they	2.3

		have received feedback by Naba'a on suggestions they had submitted.	
<b>Commitment 5:</b> Complaints are welcomed and addressed	Naba'a has a strong organisational commitment to accountability to affected populations and communities, including PSEAH and complaints management. Naba'a's CHM welcomes all complaints, with special reference to sensitive SEAH complaints, but the CHM Policy and procedures do not detail the scope of the CHM. The CHM is adapted to local context and developed in consultation with communities. NABA'A encourages and supports its implementing partners to have a CHM in place, or to resort to Naba'a CHM, although the partner agreement does not systematically require it. The CHM is used as a tool for change, adapting projects and identifying new opportunities and needs. Complaints that do not fall within the scope of the organisation are referred to a relevant party through Naba'a's network. However, there is no guidance or procedure to identify and manage referral pathways. There is a strong commitment to manage complaints in a timely, fair and appropriate manner, but Naba'a monitoring system does not include aspects regarding timely or safe management of complaints.	Community members indicate that they feel well informed, including around organisational commitments on PSEAH, child protection principles, and staff behaviour, and know how to use the CHM.	1.9
<b>Commitment 6:</b> Humanitarian response is coordinated and complementary	Naba'a is strongly committed to coordination and collaboration with others, while ensuring impartiality. It works with local and international partners, including Civil Society Organisations, and manages the child rights network MANARA. Work with partners is governed by agreements that respect each partner's mandate, obligations, and independence. Naba'a has a partner due diligence procedure in place, and it supports partner's capacity building needs, although it does not have a partners' capacity building plan in place, nor reviews the partner initial assessment systematically. Partner agreements do not include a clear reference to the expected staff behaviour standards or required Code of Conduct. Naba'a has a very good understanding of the different stakeholders at all levels, contributing to ensuring that their interventions are complementary to others. Naba'a actively shares information with different stakeholders, such as baseline needs assessments and reports.	Communities indicate that Naba'a is perceived as fair and independent organisation, while the assistance received was considered to be well-coordinated, without any duplication.	2.7
<b>Commitment 7:</b> Humanitarian actors continuously learn and improve	Naba'a has a policy framework in place for evaluation and learning at organisation level. Internal meetings, as well as regular monitoring, reporting and review activities are in place to share experience and inform programme design. However, Naba'a does not systematically manage information according to good practice (dating, naming, version control and clear access paths) to ensure its full accessibility. In addition, learning is not systematically made accessible to the wider	Interviewed communities confirm that they have seen Naba'a implement changes after they gave feedback.	2.3

	sector. Since Naba'a's MEAL System is not fully rolled out, it does not systematically feed into learning and innovation.		
<b>Commitment 8:</b> Staff are supported to do their job effectively, and are treated fairly and equitably	Naba'a is a flexible organisation with a flat hierarchy that has the management, staff and capacity in place to deliver its programmes. Staff policies and procedures are fair, transparent, non-discriminatory, and staff adhere to these. Naba'a promotes and supports the continuous development and management of staff competence and organisational change across the organisation. New staff follow an induction training programme, while frequent refresher training is organised, supporting staff understanding of Naba'a's policies and procedures. Naba'a has a CoC applicable to all its staff, volunteers and consultants and partners. It is well understood by staff. However, partner's adherence to Naba'a CoC is not systematically monitored. Naba'a is guided by the duty of care responsibility of its staff, focusing on their wellbeing, security and safety, including work-life balance. A comprehensive security management framework is in place, but it lacks a systematic monitoring of partner's capacity building needs and plans for security and staff wellbeing.	Interviews with communities indicate that they perceive staff to be competent and effective in their work, in terms of knowledge, attitude, behaviour and skills.	2.4
<b>Commitment 9:</b> Resources are managed and used responsibly for their intended purpose	Naba'a has solid policies and procedures in place to ensure that funds are used responsibly for their intended purpose. However, there is a lack of systematic due diligence procedures for accepting public or private funding. The organisation has a comprehensive set of policies and processes governing the use and management of resources, including a robust approach to fighting corruption, fraud, conflicts of interest and misuse of resources. Naba'a has a strong commitment to balancing quality, cost and timeliness, maximizing value for money in programme design and procurement processes. However, it does not monitor these aspects systematically. Internal audit procedures and practices are in place, with strong budgetary control across the organisation. However, there is no comprehensive risk policy or procedure. Naba'a is working hard to minimise impact of operations on the environment, including adaptation of its community centres to renewable power sources, but there is a lack of procedures to understand environmental impact at project level.	Interviewed community members consider that Naba'a uses resources efficiently. Communities confirm that they are aware of the mechanism to report cases of corruption if need be.	2.2

\* *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.

## 5. Summary of open non-conformities

Corrective Action Request (CAR)	Type	Resolution due date	Status	Date closed out
2022-2.5: MEAL activities are not implemented systematically across Naba'a and its projects.	Minor	2025/08/17	<i>new</i>	
2022-3.8: Naba'a does not have data management procedures in place to ensure the safeguarding of personal information.	Minor	2025/08/17	<i>new</i>	
2022-5.4: NABA'A CHM Policy and procedures do not detail the scope of the CHM to specifically include complaints regarding other abuses of power or operational complaints.	Minor	2025/08/17	<i>new</i>	
2022-5.7: Naba'a has no guidance or procedure to identify referral pathways and ensure a systematic referral for complaints falling outside Naba'a's CHM scope.	Minor	2025/08/17	<i>new</i>	
2020-5.1: The communities are not consulted on the design, implementation and monitoring of the complaint handling mechanism.	Minor	2022/03/06	<i>closed</i>	2022/08/17
2022-6.6: Naba'a partner agreements do not include reference to the expected staff behaviour standards and the need to abide by Naba'a's CoC.	Minor	2025/08/17	<i>new</i>	
2022-7.5 Naba'a does not systematically manage information to ensure its full accessibility.	Minor	2025/08/17	<i>new</i>	
2022-9.6: Naba'a does not have policies and processes in place governing risk management, the environment, and the acceptance of funds.	Minor	2025/08/17	<i>new</i>	
<b>Total Number of open CARs</b>	7			

## 6. Recommendations for next audit cycle

<b>Specific recommendation for sampling or selection of sites or any other specificities to be considered</b>	<p>No variation from the standard sampling rate is recommended. Sampling should be based on the numbers of projects active at the time of the next surveillance audit.</p> <p>It is recommended to ensure local and international implementing partners are interviewed during the next surveillance audit.</p>
---	---



In our opinion, Naba'a - Developmental Action Without Borders has demonstrated that it continues to conform with the requirements of the Core Humanitarian Standard on Quality and Accountability.

Based on the evidence obtained, we confirm that we have received reasonable assurance that the organisation has implemented the necessary actions to close the minor CAR identified in the previous audit and continues to meet the requirements of the Core Humanitarian Standard.

We recommend maintenance of certification.

**Name and signature of lead auditor:**



Jordi Capdevila

**Date and place:**

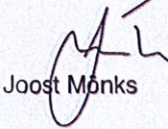
Barcelona, 17 August 2022

**Certificate renewed:**

- Issued  
 Preconditioned (Major CARs)

Next audit: before 2023/09/30

**Name and signature of HQAI Executive Director:**



Joost Monks

**Date and place:**

Geneva, 30 September 2022

**Space reserved for the organisation**

Any reservations regarding the audit findings and/or any remarks regarding the behaviour of the HQAI audit team:

Yes  No

*If yes, please give details:*

**Acknowledgement and Acceptance of Findings:**

I acknowledge and understand the findings of the audit

Yes  No

I accept the findings of the audit

Yes  No

**Name and signature of the organisation's representative:**

**Date and place:**

Saida - Lebanon  
27-10-2022

**Dr. Qassem El-Saad**  
General Manager



## Appeal

In case of disagreement with the decision on certification, the organisation can appeal to HQAI within 14 days after being informed of the decision. HQAI will investigate the content of the appeal and propose a solution within 10 days after receiving the appeal.

If the solution is deemed not to be satisfactory, the organisation can inform HQAI in writing within 30 days after being informed of the proposed solution, of their intention to maintain the appeal.

HQAI will transmit the case to the Chair of the Advisory and Complaint Board who will constitute a panel made of at least two experts who have no conflict of interest in the case in question. These will strive to come to a decision within 30 days.

*The details of the Appeals Procedure can be found in document PRO049 – Appeal Procedure.*

## Annex 1: Explanation of the scoring scale\*

Scores	Meaning: for all verification scheme options	Technical meaning for all independent verification and certification audits
0	Your organisation does not work towards applying the CHS commitment.	<p><b>Score 0:</b> 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"> <li>• <b>Independent verification:</b> major weakness.</li> <li>• <b>Certification:</b> major non-conformity, leading to a major corrective action request (CAR) – No certificate can be issue or immediate suspension of certificate.</li> </ul>
1	Your organisation is making efforts towards applying this requirement, but these are not systematic.	<p><b>Score 1:</b> 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"> <li>• <b>Independent verification:</b> minor weakness</li> <li>• <b>Certification:</b> minor non-conformity, leading to a minor corrective action request (CAR).</li> </ul>
2	Your organisation is making systematic efforts towards applying this requirement, but certain key points are still not addressed.	<p><b>Score 2:</b> 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"> <li>• <b>Independent verification and certification:</b> observation.</li> </ul>
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><b>Score 3:</b> indicates full conformity with the requirement. This leads to:</p> <ul style="list-style-type: none"> <li>• <b>Independent verification and certification:</b> conformity.</li> </ul>
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><b>Score 4:</b> indicates an exemplary performance in the application of the requirement.</p>

\* Scoring Scale from the CHSA Verification Scheme 2020