OXFAM INTERNATIONAL

CHS Initial Verification Audit Report

OXI-VER-2018-003

Date: 2018-06-18

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1. General information

Organisation	Oxfam International			
Type	☐ National ☐ Membership/Network ☒ Direct assistance		☒ International ☒ Federated (Confederation) ☒ Through partners	
Mandate	☒ Humanitarian	☒ Development		☒ Advocacy
Verified Mandate(s)	☒ Humanitarian	☐ Development		☐ Advocacy
Size (Total number of programme sites/ members/partners – Number of staff at HO level)	35 Country Programme with humanitarian responses as of date of application		Sampling Rate (Country programme sampled)	1. Ethiopia 2. Uganda 3. Bangladesh
Lead auditor	Claire Goudsmit		Auditor	Stephen Morrow
			Quality assurance	Elissa Goucem, HQAI
Locations	OI and OXGB Head Office	OX Novib	Programme Site(s)	
	Oxford, UK	Skype calls	Ethiopia Uganda Bangladesh	
Dates (2018)	20-22. 02.2018	21-22. 02.2018	26.02-02.03.2018 05-09.03.2018 02-05.04. 2018	

2. Schedule summary

2.1 Verification Schedule

Name of Programme sites/members/ partners verified	Location	Mandate (Humanitarian, Development, Advocacy)	Number of projects visited	Type of projects
Oxfam Ethiopia	Addis Ababa, Jijiga & Dollo, Ethiopia	Humanitarian	3	EFSVL, WASH, PHP, protection
Oxfam Uganda	Kampala & Arua, Uganda	Humanitarian	3	EFSVL, WASH, PHP, protection
Oxfam Bangladesh	Dhaka & Cox's Bazar, Bangladesh	Humanitarian	3	EFSVL, WASH, PHP, protection

2.2 Opening and closing meetings

2.2.1 At Head Office:

	Opening meeting	Closing meeting
Date	20.02.2018	22.02.2018
Location	Oxfam House, UK	Oxfam House, UK
Number of participants	2	4
Any substantive issue arising	2020 transition - Oxfam was in difficulty at the time of the start of the audit visits, after allegations of SEA by Oxfam staff and under-reporting of facts to the Charity Commission were reported and publicised widely in the UK press. The organisation was under investigation at the time of the visits. Staff were in various states of shock, anger and upset due to the crisis and some key staff were not able to attend interviews. Auditors made it clear to all interviewees that, whilst mindful of the situation, the audit would continue as normal; although some components of the CHS include safeguarding issues, it was made clear to staff that this was not a full safeguarding audit of Oxfam.	

2.2.2 At Programme Site(s):

	Opening meeting	Closing meeting
Date	26.02.0218	02.03.2018
Location	Oxfam Country Office, Addis Ababa, Ethiopia	Oxfam Country Office, Addis Ababa, Ethiopia
Number of participants	SMT x 5 staff	2 staff

Any substantive issue arising		
Date	05.03.2018	09.03.2018
Location	Oxfam Country Office, Kampala, Uganda	Oxfam Country Office Kampala, Uganda
Number of participants	12 staff	7 staff
Any substantive issue arising		
Date	02.04.2018	Scheduled 16.05.2018
Location	Dhaka Country Office, Bangladesh	Virtual meeting
Number of participants	3 SMT	6 staff

3. Recommendation

In our opinion, Oxfam International does conform with the requirements of the Core Humanitarian Standard.

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

Lead Auditor's Name and Signature:

Claire Goudsmit

Date and Place:
08.05.2018 UK

4. Quality Control

Quality Control by	Elissa Goucem
Follow up	
First Draft	2018-05-11
Final Draft	2018-05-30

# 5.   Background information on the organisation

5.1   General

The audit falls at the end of the implementation and beginning of the operational stage of Oxfam's strategic change process which focuses on 5 pillars (OI's Implementation Plan 2013-2020):

The Country Focused One Programme Approach;

Rigorous Quality Assurance;

Building Preparedness and Response Capacity;

Changing Oxfam's Organisational Culture and

Changing its Institutional Roles.

The Oxfam International (OI) Secretariat is leading this process in line with the global strategy and Operational Plan. Oxfam's Humanitarian Strategy and Implementation Plan draws from the 5 pillars to address key areas for change. Strategy 2012 – 2020 has a phased approach to effect change – 2012-2014 Pilot Stage, 2014-2018 Implementation Stage, 2018-2020 Operational Stage. Oxfam is currently operating as a new structure and many staff are finding their way through a large transition and change process. Inevitably, at the time of this initial verification audit the transition has had an impact on OI's ability to present a consistent and systematic approach in all areas of its work and the CHS. This has been taken into consideration but does not lessen the requirements of the audit.

5.2   Organisational structure and management system

The management responsibility for all of Oxfam's humanitarian work runs from the OI Programme Director through the OI Regional Director (RD) and then the OI Country Director (CD). They are responsible for a "One Programme" approach which links long-term, resilience building programmes with campaigning and emergency response. The OI Humanitarian Director is managed by the Programme Director and is Oxfam's most senior humanitarian role. The Humanitarian Director leads the delivery, effective management, monitoring, evaluation and learning of Oxfam's overall Humanitarian Agenda, and manages the Global Humanitarian Team (GHT). The GHT exists to support Regional and Country teams respond to crises that are too large or complex for them to manage alone.
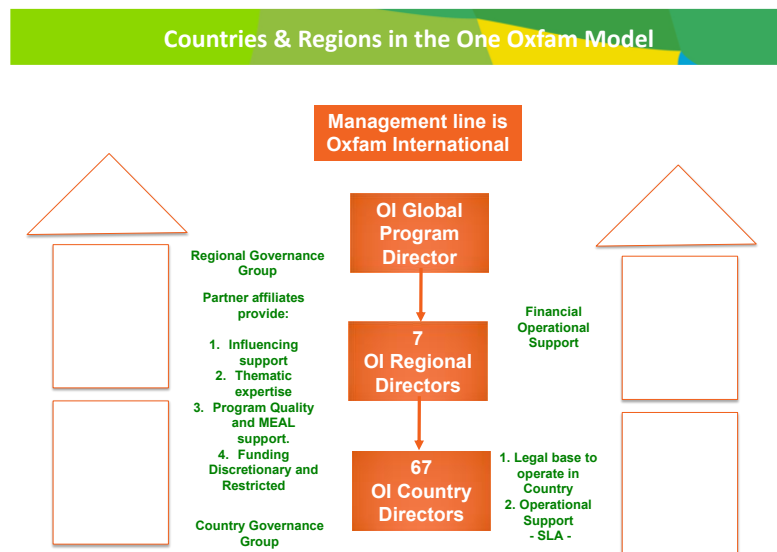
Countries are the key unit for the design and delivery of Oxfam's programmes and as such, play the primary role in humanitarian responses. They are required to be resourced adequately to prepare for and respond to local emergencies (Category 3 crises) in addition to running their ongoing programmes. Country Teams should maintain levels of humanitarian capacity appropriate to the likelihood of disasters occurring, as part of preparedness plans.
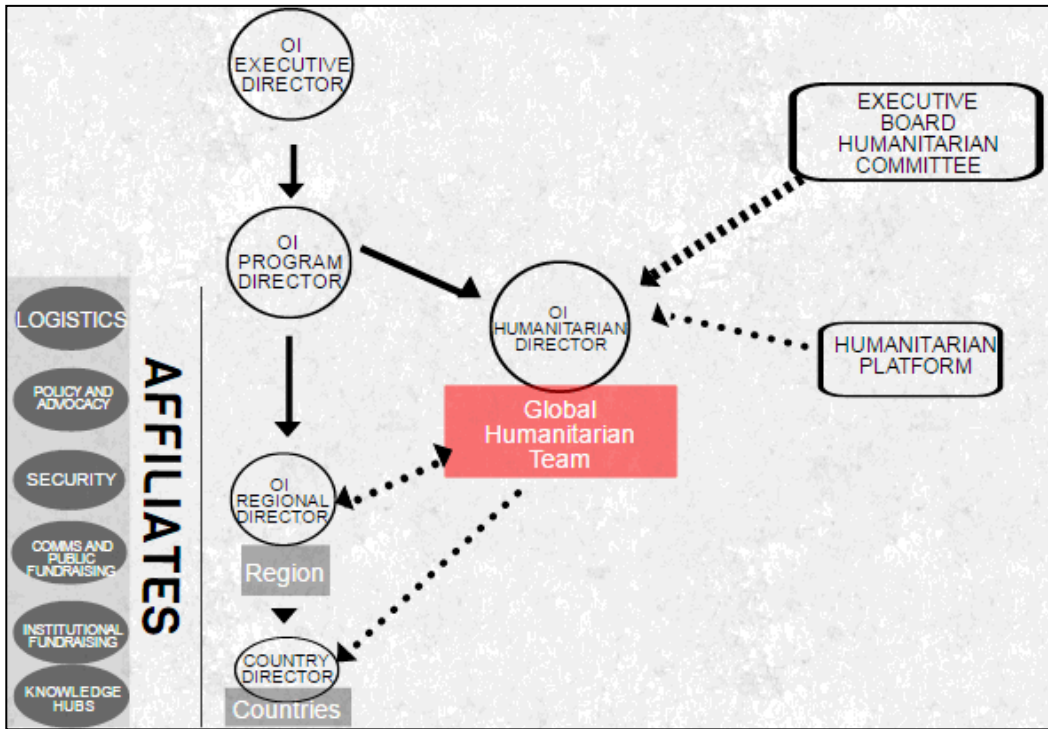
5.3 Work with Partners

One of Oxfam's 3 global strategic priorities is around Local Humanitarian Leadership and there is a strong organisational policy for supporting and strengthening Southern capacity and working with national partners in humanitarian response (see ind.3.3). Oxfam has short and long-term global, regional and in-country partnerships with various humanitarian actors. In year 2016/2017 Oxfam transferred approximately 14.1% of its humanitarian spend to local and national NGOs – LAC, ASIA and SAF countries transferred 26%, 52% and 41% respectively to L/NNGOs.

Oxfam is a member of the START Network and has signed-up to The Charter for Change following the World Humanitarian Summit and is committed to conduct its humanitarian programme work in a way that supports the capacity of local organisations to increase their role, share and leadership in humanitarian responses. Oxfam's ELNHA programme is implemented in Bangladesh and Uganda, where learning can influence Oxfam's longer-term approach to partnership in humanitarian response. The approach to partnership varies across Oxfam Affiliates, and therefore the global OI partnership policy is currently being updated to better reflect the One Oxfam programme approach. Work with implementing partners is governed by partnership agreements and capacity support is based on the findings of partner assessment processes and ongoing dialogues between Oxfam and partner teams.

5.4 Certification or verification history

This is the first third-party verification audit against the CHS that Oxfam has undertaken. Oxfam was not previously audited against the HAP Standards or People in Aid.

6. Sampling

6.1 Rationale for sampling

Some Programme Sites (PS) were deselected from Oxfam's list of countries based on the following aspects: emergency response programme was scaling down, closed or closing early 2018; small-scale response with limited project activities and funding; no or limited access to project areas; unpredictable and highly volatile environment making entry and in-country travel (especially to projects) difficult and changeable; lack of time available to obtain entry visa; difficultly or unreliability of entry visa and/or in-country travel authorisations and permissions; very few or no emergency response staff present; 1 Executive Affiliate (EA) and no Partner Affiliates (PA) engaged; new office set-up; responses which have high frequency of visits and highly demanding time of response.

The initial PS countries selected were shortlisted based on the following aspects: active and on-going response programme; access is manageable within timeframe and requirements for entry visas and authorisations; travel in-country to visit projects is feasible; manageable security situation; mid-large-scale budget; number of projects; a number and range of partners; average number of EAs and PAs; humanitarian staff present. Auditors initially shortlisted the following countries: DRC, Chad, Lebanon, Tanzania, Uganda, Iraq, Somalia, Bangladesh and Ethiopia, To select the final two programme sites additional information was asked of Oxfam HO and PS teams to better understand the feasibility of visiting the country at the time of the audit based on: type and level of emergency response; accessibility and security situation; HEAT training requirements for travel; intensity and level of external visits to the project areas being conducted; current demands on the response, Oxfam teams and communities; distance to project locations.

Based on this information **Ethiopia and Uganda** were selected to offer different Executing Affiliates and operational perspectives; both direct and indirect through partner implementation; larger-scale budgets for each country programme and response; significant number of staff; adequate security levels and accessible.

In late February 2018, information became public that several allegations of sexual abuse by Oxfam staff in Haiti in 2011 had been mismanaged by Oxfam, leading to the opening of several investigations against the organisation. In reaction to this evolution, HQAI secretariat and the lead auditor reviewed the audit risk analysis and recommended to add a third country in the sample of visited sites, as to add another layer of assurance to the process. Oxfam agreed to add a third on-site visit and was open and transparent throughout the audit process, and especially concerning this issue.

After a second round of analysis and sampling, **Bangladesh** was selected and agreed with Oxfam as an additional sample to be included. The selection was made on the grounds that it shared structural features with the 2011 Haitian crisis: sudden and important surge for a large-scale emergency with very large groups of vulnerable people affected.

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 Recommended sample size for the mid-term audit

The auditors recommend that at least the GHT, 1 Affiliate engaged in humanitarian work (excluding OXGB, OXNL) and two programme sites be included for the mid-term audit.

6.3 Interviews:

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

Position of interviewees		Number of interviewees
Head Office		
Oxfam International, including GHT		17
Oxfam GB		8
Oxfam Novib		6
Programme Sites		
Ethiopia	Oxfam staff	21
	Partner staff	3
Uganda	Oxfam staff	22
	Partner staff	6
Bangladesh	Oxfam staff	10
	Partner staff	2
Total number of interviews		95

6.3.2 Focus Group Discussions (interviews with a group >6

Type of Group	Number of participants	
	Female	Male
Ethiopia		
IDP community – members of WASH, Cash and complaints committees (OWDA)		7
IDP community – members of health, Cash and complaints committees (OWDA)	8	
IDP community – members of WASH, Cash and complaint committees (OWDA)	8	
IDP community – members of WASH, hygiene, Cash and complaints committees (OWDA)		8
IDP community – members of protection committee (Oxfam)	10	
IDP community members, some elders (Oxfam)		10
Uganda		
Rhino Camp	5	5
Rhino Camp	5	1
Rhino Camp	14	0
Rhino Camp	9	0
Yembe Camp	7	4
Yembe Camp	10	0
Yembe Camp	1	2
Bangladesh		
Flood response beneficiaries (MJSK partner)	12	
Flood response beneficiaries (MJSK partner)		10
Flood response beneficiaries (MJSK partner)	5	5
Refugee response, Ukhia Mega Camp (protection)	12	
Refugee response, Ukhia Mega Camp (fresh food)		13
Refugee response, Ukhia Mega Camp (Listening Group)	8	
Refugee response, Teknaf Camp (EFVSL)	13	
Refugee response, Teknaf Camp (latrines)		10

Refugee response, Teknaf Camp (CB Volunteers)	5	5
Disaster Management Committee		13
Total number of participants	132	93

7. Report

7.1 Overall organisational performance

Oxfam has made an organisational commitment to adopt the Core Humanitarian Standards (CHS) and to integrate the commitments into its work. Oxfam performs well against the CHS, with strong policies and practices across the organisation.

Oxfam is in the midst of a significant organisational change process and is engaged in many processes to develop and establish its One Oxfam and One Programme approach. In light of this, Oxfam's application of a quality management system and controls across the Confederation – all affiliates, countries and teams – is difficult to fully achieve at the current time. Oxfam has harmonised a number of key policies and procedures and as these, and others, are further embedded into Oxfam's ways of working and structure, a greater level of consistency and assurance will be provided.

The breadth of technical expertise and best practice across the organisation puts Oxfam in a good position to integrate the CHS fully into its programme approach and operations systematically. However, Oxfam's ability to absorb ambitious targets and commitments and at the same time ensure that staff are informed, resourced, fully updated on all necessary changes to policies, procedures and ways of working can be challenging at times. Some areas of weakness around identifying and managing risk and actual negative effects of Oxfam's work are highlighted under commitments 3, 5, 7 and 8.

7.2 Summary of Weaknesses

Weaknesses	Type	Time for resolution*
2018 - 2.6. OI does not ensure that capacities are in place to consistently and effectively meet its programme commitments in emergency response.	Minor Weakness	2 years
2018 - 3.6. OI does not have a consistent approach to identifying and acting upon potential or actual unintended negative effects in a timely and systematic manner across all EAs, Country Offices and humanitarian programmes.	Minor Weakness	2 years
2018 – 5.1. OI does not ensure that programmes have systems in place to consistently consult with communities and people affected by crisis on the	Minor Weakness	2 years

design, implementation and monitoring of complaints-handling processes.		
2018 - 5.3. OI does not ensure that complaint mechanisms are consistently established in a timely manner, and that complaints are consistently and appropriately managed in line with its global guidelines.	Minor Weakness	2 years
2018 - 5.6. OI does not ensure that communities are aware of its commitments on PSEA and the expected behaviour of Oxfam and partner staff.	Minor Weakness	1 year
2018 - 7.1. OI does not ensure that humanitarian programmes are systematically designed based on the learning and experiences from previous work.	Minor Weakness	1 year
2018 - 8.4. OI does not ensure that it has the management and staff capacity and capability to deliver its programmes consistently.	Minor Weakness	2 years
2018 - 9.6. OI does not ensure consistent policies and processes governing the use and management of resources are in place across all EAs.	Minor Weakness	2 years
TOTAL Number		**8**

* Time for resolution is given as an indication in the framework of verification.

7.3 Strong points and areas for improvement:

Commitment 1: Humanitarian assistance is appropriate and relevant

Score: 2.9

Oxfam commits to impartial assistance and designs programmes based on ongoing assessments of needs and risks and an understanding of vulnerabilities and capacities of different groups, through the consistent use of a variety of tools and consistent disaggregation and analysis of data. This is reflected consistently in country operational plans and programming. Project activities are adapted to changes to the context, needs or capacities of communities and stakeholders based on the findings from different tracking tools such as monitoring visits or Post Distribution Monitoring (PDM), community consultations and project review meetings with partners and local stakeholders. However, where emergency responses are managed outside of the country management structure, limited consultation and engagement with country-based humanitarian teams can result in the initial emergency response strategy not being aligned to Oxfam's strategy and position in country.

Feedback from people affected by crisis and communities on Commitment 1

Communities at PS consistently stated that the aid received was in line with their needs and considered their capacities. Communities have seen how their inputs and feedback have influenced project designs.

Commitment 2: Humanitarian response is effective and timely

Score: 2.4

OI has clear protocols on how, when and who is best placed to respond to a humanitarian crisis and is investing in its capability to respond quickly and appropriately through the Single Management System and the GHT. A "no regret approach" is followed in emergency programming and a range of protocols and resources support timely decision making at different levels of the organisation. Nevertheless, in the context of large scale emergencies balancing in-country long term capacity with scale up necessities proves to be a challenge within the 2020 process. The organisation has the tools to monitor activities and outcomes, and programmes are adapted based on monitoring results. However, MEAL activities are frequently under resourced at the beginning of responses, which can impact negatively the early identification of poor performance.

Feedback from people affected by crisis and communities on Commitment 2:

Communities in general were satisfied with the timing of the response activities.

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

2.3

OI's Humanitarian Strategy and key guidelines include resilience and DRR and a focus on strengthening local, regional, and national capacities. A significant project in Uganda and Bangladesh explicitly works to strengthen local humanitarian leadership and local operational capacities, although this approach has not yet been implemented widely across OI's humanitarian programs. OI aims for connectedness between humanitarian responses and recovery phases, however it does not have a consistent approach to developing exit strategies to give effect to this. OI's approach to identifying and acting upon potential or actual unintended negative effects is affirmed at the strategic level but varies between EAs and humanitarian responses, including around SEA and the environment. OI does not have consistent systems across all EAs to safeguard personal information collected from communities and people affected by crisis.

Feedback from people affected by crisis and communities on Commitment 3:

Communities affirmed they were advised about activities and services at the outset of humanitarian responses and were engaged in selection of local structures and ongoing activities. They described the interventions as generally positive contributions to their situation and their capacity to manage in this and subsequent times.

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

2.9

OI guidelines steer country teams to share information, to consult with communities, and to ensure their participation in humanitarian response activities through most stages of the project cycle. OI generally advise communities about project services and activities, but not usually about Oxfam as an organisation, its values, codes of conduct, and

expected staff behaviours. Oxfam works with communities to establish local committees and other structures that enable ongoing consultation and feedback throughout the projects. OI has a range of guidelines about media and public information that include review and sign off to ensure consent, as well as accurate and ethical representation of people affected by crisis.

Feedback from people affected by crisis and communities on Commitment 4:

Communities were generally aware of Oxfam's focus on water, protection, hygiene and livelihoods sectors, its identity as an international NGO/donor, and the operational aspects of projects. They affirmed their engagement in project activities, particularly through local committees and structures, but were generally not aware of Oxfam's values and its expectations around staff behaviour.

Commitment 5: Complaints are welcomed and addressed

1.4

OI's organisational culture around complaints is variable across the confederation, and practice also varies between Affiliates and humanitarian responses, including around SEA. The organisation is currently working to harmonise this range of approaches and practices. OI outlines principles for feedback and complaint mechanisms and reflects them in recently developed confederation-wide approaches to MEL and social accountability and other guiding documents. These do not address out-of-scope complaints and referral pathways. Generally, verbal feedback and complaint processes are in place to varying degrees in humanitarian responses, particularly through local committees and community structures. However, documented feedback and complaints mechanisms are not implemented in a systematic and timely manner in humanitarian responses.

Feedback from people affected by crisis and communities on Commitment 5:

There is very little consultation with communities about the design of feedback and complaint mechanisms, but there is more engagement through the implementation and monitoring of complaints as activities progress. People are generally aware of how to complain and felt able to raise issues about activities and services. Communities did not generally understand standards around staff behaviour other than local norms for politeness and respect and were not aware of processes for raising concerns about staff behaviour including SEA.

Commitment 6: Humanitarian response is coordinated and complementary

Score: 2,8

Oxfam is engaged in several global, regional and national coordination and collaborative projects and is committed to share information with humanitarian stakeholders. Its policies require country teams to identify the roles and work of national and local authorities, and other humanitarian actors, including how Oxfam complements these and what local structures and partners it intends to coordinate and work with. OI shares information with partners, coordination groups and other relevant actors through appropriate communication channels. Nevertheless, in emergency response, OI's

capacity to work with partners in a consistent manner and in line with set agreements is not yet assured across all Executing Affiliates.

Feedback from people affected by crisis and communities on Commitment 6:

Communities consistently identified that the assistance provided by Oxfam responded to needs that were not covered by other agencies and were satisfied Oxfam assistance complemented the aid received from other actors.

Commitment 7: Humanitarian actors continuously learn and improve

Score: 2

At global level, OI monitors progress against its strategic plan and conducts Real Time Reviews (RTR) of global processes and meta-evaluations of emergency response RTRs to identify good practice areas and areas of weakness from which to learn and improve practice. Changes to programmes are made to project activities as a direct result of findings from monitoring. However, there are gaps in the systems to collect, collate and analyse feedback and complaints at the country level, from which changes could be made. Learning and innovation are shared with internal and external stakeholders through various learning systems and several IT based platforms are used by different affiliates for information sharing internally. Support Personnel (HSPs), global and regional advisors when present can bring learning into responses, but as these staff often move through quickly, capturing this learning is often a challenge for country teams.

Feedback from people affected by crisis and communities on Commitment 7:

Communities were satisfied that programmes improve with time but have generally not received information about the outcomes of monitoring or learning events that they participated in, apart from seeing direct adaptations to project activities in some cases.

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

Score: 2.2

Staff in Oxfam generally work according to the mandate and values of the organisation and to agreed objectives and performance standards. They are generally aware of the consequences of not adhering to core policies such as the Code of Conduct, but as the organisation evolves towards One Oxfam, it has not yet ensured a comprehensive induction and training on key policies across the organisation. OI is developing capacity across the Confederation to establish the One Oxfam 2020 structure and ensure that Country and Regional Directors have the necessary capability to fulfil their role and deliver programmes effectively, but some gaps in capacity appear in scaled up emergencies, mainly related to staff capacity, and high turnovers and workloads.

Feedback from people affected by crisis and communities on Commitment 8:

Communities were generally appreciative of the capacity and skills of Oxfam staff and did not did not raise issues of concern about this area.

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

1.8

OI's humanitarian Commitments and Expectations charge the confederation to respond to humanitarian crises according to agreed criteria. This involves rapid scale-up and deployment of HSPs to support country teams, with associated rapid turnover of HSPs and other staff, and this pattern of short deployment and high turnover can negatively affect efficiency and program quality e.g. around capacity development with local actors. Executing Affiliates have responsibility for business support systems in each country program including in those with humanitarian responses. OI has not yet harmonised the business support systems across the confederation and hence different VfM assessments, financial management systems, internal audit systems and consideration of environmental issues can all negatively affect how OI manages resources.

Feedback from people affected by crisis and communities on Commitment 9:

Communities and people affected by crisis generally affirmed their satisfaction with the activities and did not raise any issues of concern about resource utilisation.

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 ☐

I accept the findings of the audit ☐

I do not accept some/all of the findings of the audit ☐

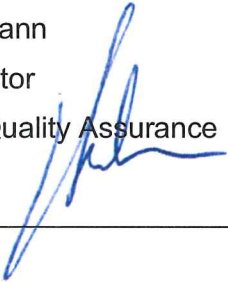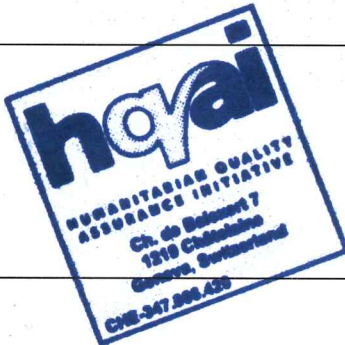Please list the requirements whose findings you do not accept

Nigel Timmins (signature)

NIGEL TIMMINS.

Name and Signature

Oxford

Date and Place

21 June 2018.

2018-06-18

9. HQAI's decision

Independent Verification Decision
Registration in the verification scheme: ☒ Accepted ☐ Refused
Next audits Maintenance self-assessment before: 2019-07-02 Mid-term audit before: 2020-07-02 Second maintenance self-assessment before: 2021-07-02

Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative	Date: 2018-07-03

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

0	**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. • 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.
1	**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.
2	**A score of 2 denotes an issue that deserve attention but does not <u>currently</u> 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.
3	**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 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.	