

Norwegian Church Aid (NCA)

Recertification Audit – Summary Report 2021/11/12

1. General information

1.1 Organisation

Type	Mandates	Verified
<input checked="" type="checkbox"/> International <input type="checkbox"/> National <input type="checkbox"/> Membership/Network <input 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
Head office location	Oslo, Norway	
Total number of country programmes	27 (This does not include regional offices)	Total number of staff
		779 Head Office – 158 Country Offices – 621

1.2 Audit team

Lead auditor	Joanne O’Flanagan
Second auditor	Francesco Dagostino
Third auditor	N/A
Observer	N/A
Expert	N/A
Witness / other	Claire Goudsmit (HQAI, Supervision)

1.3 Scope of the audit

CHS Verification Scheme	Certification
Audit cycle	Second
Phase of the audit	Re-certification
Extraordinary or other type of audit	N/A

1.4 Sampling*

Randomly sampled sites	Included in final sample	Replaced by	Rationale for sampling and selection of sites	Onsite or remote
Palestine	Yes		Palestine has not previously been sampled for an audit. The particular operational model is useful to assess as NCA works through a Joint Office model, with ACT Alliance partner Dan Church Aid (DCA). NCA follows DCA routines and procedures in Palestine. This model, which operates in four NCA COs, has not been assessed in previous audits.	Remote
Venezuela	No	Haiti	Venezuela was not selected as this is a small and very recent project involving only 2 NCA roster staff, deployed for a short period of time. Replaced by Haiti to maintain geographical spread in the sample, it also provides a more substantial portfolio of work. Further, Haiti is managed through a Lead Agency model which, from a risk perspective, is valuable in allowing the auditors to assess how NCA works through this kind of operational model. Haiti is the only example of this	Remote

			model of operation in NCA's portfolio. The three organisations collaborating and sharing an office in Haiti are NCA, Lutheran World Federation (LWF) and Diakonie Katastrophenhilfe (DKH). NCA and LWF have fully integrated their programmes and systems under the management of a single Country Director contracted by LWF. LWF is a member of the CHS Alliance. Both LWF and DKH are also members of the ACT Alliance.	
Lebanon	No	Tanzania	Lebanon was part of the MA (2020) under the Jordan regional office. Replaced by Tanzania for better geographical coverage as Palestine is already part of the random sample. Tanzania was selected for an onsite visit although restrictions due to COVID-19 meant the onsite visit was conducted remotely. NCA is a member of the ACT Alliance and partners with many faith-based actors. The projects selected for sampling represent a mix of different faith groups among NCA's portfolio of partners in Tanzania.	Remote onsite

Any other sampling performed for this audit:

Purposive sampling of an additional Country Programme, Southern Africa (remote), for two reasons. Firstly, the sampling rate for recertification audits was amended by HQAI over the period during which sampling took place. In consultation with NCA during Stage 1 it was agreed that it would be useful to add an additional CP to the sample particularly considering that onsite assessment in Stage 2 of the audit was unlikely to be feasible due to COVID 19 restrictions on travel. Secondly the Southern Africa Office's mandate (advocacy) was not covered by the other samples.

Sampling risk:

Despite some limitations with remote auditing methodologies, the auditors are confident that the evidence obtained is sufficient and appropriate to provide a basis for their conclusions and recommendation. There is confidence that the CPs sampled are representative of NCA's different mandates and models of operation. Despite the use of remote technologies, it was possible to gather some information through community consultations. However, there are some limitations as the lack of a fully stable internet connection created some disruptions during community meetings. Further, as a result of the earthquake in Haiti (Aug 2021) it was not possible to speak with all planned informants. Interviews were limited to staff of the Joint Office (JO) in Haiti and from NCA and LWF who are members of the JO Steering Committee, no partners were interviewed.

**It is important to note that the audit findings are based on a sample of an organisation's country programmes, its documentation and 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
Tanzania	06 – 10 September 2021	Remote (onsite)
Southern Africa	13 - 17 September 2021	Remote
Haiti	13 - 17 September 2021	Remote
Palestine	13 – 17 September	Remote (document assessment)

2.2 Interviews

Position / level of interviewees	Number of interviewees		Onsite or remote
	Female	Male	
Head Office			
Management	6	5	Remote
Staff	3	3	Remote

Country Programme Office(s)			
Management	5	2	Remote
Staff	2	0	Remote
Partner staff	7	12	Remote
Others			
Total number of interviewees	23	22	

2.3 Consultations with communities

Type of group and location	Number of participants		Onsite or remote
	Female	Male	
1. Women's Focus Group - Evangelical Lutheran Church in Tanzania- Northern Diocese (ELCT ND) projects, Moshi, Tanzania	6	0	Remote
2. Men's Focus Group - Evangelical Lutheran Church in Tanzania- Northern Diocese (ELCT ND) projects, Moshi, Tanzania	0	5	Remote
3. Youth Focus Group - Evangelical Lutheran Church in Tanzania- Northern Diocese (ELCT ND) projects, Moshi, Tanzania	3	2	Remote
Total number of participants	9	7	

2.4 Opening meeting

Date	2021/04/19
Location	Remote (Oslo)
Number of participants	62
Any substantive issues arising	None

2.5 Closing meeting

Date	2021/09/20
Location	Remote (Oslo)
Number of participants	6
Any substantive issues arising	None

2.6 Programme site

Briefing

Date	2021/09/06
Location	Remote (Dar es Salaam)
Number of participants	6
Any substantive issues arising	None

De-briefing

Date	2021/09/13
Location	Remote (Dar es Salaam)
Number of participants	3
Any substantive issues arising	None

3. Background information on the organisation

3.1 General information

Norwegian Church Aid (NCA) is an independent diaconal organisation providing emergency assistance in disasters and working for long-term development with local communities to address the root causes of poverty. NCA Head Office (HO) is legally registered as a diaconal organisation in accordance with Norwegian legislation; Country Offices (CO) are registered as non-profit organisations according to relevant national laws and regulations.

NCA was established in 1947 and is headquartered in Oslo, Norway. It is mandated by Norwegian churches and Christian organisations. NCA's global strategy, *Faith in Action*, articulates commitment to putting people affected by crisis, and their needs, at the centre of their humanitarian response programmes. NCA currently operates in 27 countries, with a focus on six main thematic areas: Climate Resilient Water; Sanitation and Hygiene (WASH); Gender-Based Violence; Peacebuilding; Climate Smart Economic Empowerment Faith-Based Climate Action and Fighting Inequality.

NCA is affiliated with the World Council of Churches, is a founding member of the ACT Alliance, comprised of more than 110 organisations working in long-term development and humanitarian assistance, and is a member of Voluntary Organisations in Cooperation in Emergencies (VOICE), a network of 88 NGOs promoting effective humanitarian aid, as well as the International Council of Voluntary Agencies (ICVA), a network of over 100 NGO members whose mission is to make humanitarian action more principled and effective.

NCA's budget for 2021 is approximately 1,100 million NOK (c. 110 million Euro) employing 779 staff both in Norway and overseas, of which 557 (90%) are national staff and 56 (10%) are international staff. NCA works with 230 partners globally.

3.2 Governance and management structure

NCA continues to demonstrate its commitment to the CHS across all aspects of its work and to strengthen its management structures and processes for quality and accountability.

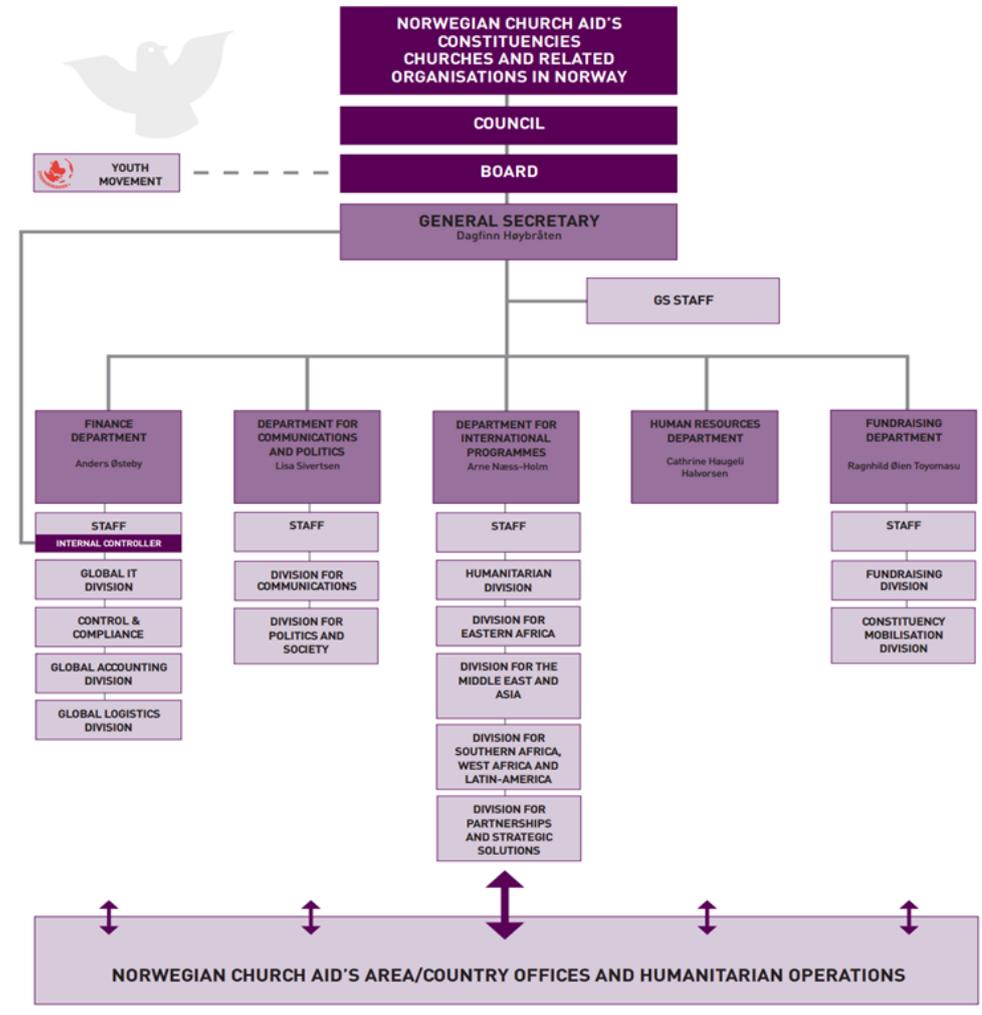
Since the Mid-Term Audit (MTA) (2019) and Maintenance Audit (MA) (2020) NCA has instituted a number of initiatives in relation to organisational governance and management processes, to inform strategic decision making and resource allocation at a global level. The previous Department of Politics and Society (i.e., advocacy) and the Department of Communications have been merged and renamed the Department of Communications and Politics, with two divisions under the responsibility of one Director. This change is accompanied by the development of new strategies for both NCA's Communications and Advocacy work (2021). Quarterly reporting to the Board of Directors has been revised, as of the first quarter of 2021, to ensure a more comprehensive but succinct summary of critical issues for Board awareness including a short management summary and sections on finance, security, complaints, compliance, corruption, HR, GDPR; the section on risk outlines a clear update on identified risks and mitigation activities over the previous quarter.

The findings of previous HQAI audits in conjunction with evolving donor requirements, have had a significant impact on NCA. Most recently this led to the refinement and consolidation of NCA's *Complaint Handling Mechanism* and standardisation of complaint processing procedures, which represent one of the organisation's most significant achievements in relation to compliance with the requirements of the CHS. Furthermore, a comprehensive cross-departmental action plan was developed to address previous audit findings, which has led, among other initiatives, to:

- Development of new organisational policies, including the *Protection from Sexual Harassment, Exploitation and Abuse (PSHEA)* and *Child Safeguarding (CS) Policy* (2021), and the *Climate and Environment Policy* (2021).
- Appointment of a *Senior Civil Society and Programme Sustainability Advisor* (October 2020), tasked with translating the CHS commitments into programme management tools and templates, and adapting these for COs, complementing and strengthening the work of the existing *Complaints & Accountability Advisor*.
- CHS commitments fully embedded throughout the revised Operations Manual (OM). The OM is NCA's comprehensive handbook of mandatory quality requirements and templates at CO level for all programmes and operations. It includes chapters on monitoring and evaluation (M&E); financial management; HR; funding and grants; and partnerships.

The organogram below shows the governance and management structure of NCA.

NORWEGIAN CHURCH AID'S ORGANISATION CHART AS OF 01.01.2021



3.3 Internal quality assurance mechanisms and risk management

The MA (2020) noted that the NCA *General Secretary* (GS), appointed 2019, was strengthening NCA's compliance on anticorruption, complaint handling, GDPR and internal control by creating new positions, one of which was the appointment of a *Senior Anti-Corruption Advisor*. Since the MA, NCA has continued to implement strategic changes in terms of management controls and quality assurance processes. This includes significant reconfiguration of control and compliance functions with the appointment of senior positions in the Finance Division, including a *Quality Control Manager* (November 2020) and *Divisional Head of Control and Compliance* (March 2021). NCA revised its salary structures to ensure that it can attract and retain experienced capacity in these critical functions.

Beginning in 2021, NCA introduced a *Global Management Dialogue* process; the purpose is to improve mutual accountability between NCA HO and COs and to manage strategic risks at a global level. Two high-level meetings are held annually, based on an *Annual Assignment Letter* with the aim of addressing operational issues, which represent strategic risks for NCA. The Annual Assignment Letter identifies global issues that HO identifies to be of critical importance for risk management for all COs, while COs also identify strategic issues specific to their operational context, and, through a process of consultation, a final letter is prepared and signed for each CO. These two elements address strategic priority issues for the whole organisation, particularly in relation to operational issues and associated risks both to NCA and to rights-holders and are supported by a *Global Annual Calendar* to facilitate coordination, resource planning and information sharing between HO and COs. It offers an overview of what happens, when, and who is involved, including responsibility for sign-off and approval, with embedded links to relevant documents and processes. The calendar is hosted on SharePoint and is accessible to all NCA staff.

At a global level, information management for operational purposes, is served by a new *Project Information and Management System (PIMS)*, scheduled for roll-out in mid-2021. PIMS will become the primary tool for NCA programme staff as it will centralise and consolidate all programme/project information and documents in one location. PIMS is built on the SharePoint platform, as is the *NCA Operations Manual*. The system is a tool to facilitate greater integration and efficiency across key quality assurance and risk management policies and procedures. PIMS will also support NCA to monitor the systematic application of mandatory requirements from the *Operations Manual* across all programmes.

At the CO level, risk management is handled in a number of ways:

Security risk management (SRM) for the systematic protection of NCA personnel and assets.

Sustainability standards – a new term adopted by NCA that covers cross-cutting issues as a core foundation for programme quality - the CHS; Human Rights (RBA); Women's Rights and Gender Equality (Gender sensitivity); Environmental sustainability; Conflict sensitivity (Do No Harm) and Anti-corruption - these are mandatory requirements for all projects and are described in *Country Strategies* in terms of related risks and mitigations (*Risk Management Annex*).

Risk analysis for projects - risk analysis and mitigation are mandatory in project management and embedded in planning and reporting templates.

NCA has introduced a new Protection from *Sexual Harassment, Exploitation and Abuse (PSHEA)* and *Child Safeguarding (CS) Policy (2021)* which will accompany the *Code of Conduct* as a companion policy; rollout across the entire organisation will be complete by end of 2021. This means that all staff will be regularly trained and updated on the policy, and it will be signed as part of all contracts of employment, both new and existing. The policy applies to all staff and to all offices of NCA when working with implementing partners in all programme contexts. The policy has been developed to explicitly address and minimise risks of harm to children in particular, and to protect all those that come into contact with NCA, particularly those who may be considered vulnerable, from risks of SHEA.

3.4 Work with partner organisations

NCA works with around 230 partners globally (2021). Its core strategy for strengthening civil society is anchored around its partnership work, particularly with faith actors who NCA sees as key agents of change. The approach is articulated in NCA's *Programme Framework 2020-2030* and in its new *Civil Society Partnership Policy (2021)*. As part of the ongoing OM revision process the chapter on Partnerships has been revised, in particular:

- Partner MoUs, to clarify and formalise expectations between NCA and the partner, focusing on mutual accountability.
- Partner assessment, to cover how partners provide information to rights-holders, and on how they communicate with rights-holders through the *Partnership Assessment Tool (PAT)*. The PAT is also used as the basis for establishing partner capacity development plans.

The *Partner Project Proposal (PPP)* template has also been amended to take account of CHS requirements and NCA *Sustainability Standards*. These initiatives are part of a comprehensive effort on the part of NCA to address the outstanding Minor CAR (5.6), now closed and to ensure that rights-holders are systematically made aware of the expected behaviour of NCA and partner staff, including commitments on PSEA.

NCA hosts annual partner meetings between NCA and partner senior staff which also provides an opportunity to review the partner agreement (MoU), to reflect on the quality of partner relations and to clarify expectations in relation to communication, trust, accountability and transparency.

4. Overall performance of the organisation

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

Over the period of the first certification cycle, NCA has continued to develop standards and procedures to strengthen its systems in line with the commitments of the CHS. The organisation continues to make improvements to its assurance mechanisms and components of its quality management system.

NCA has reviewed and adapted its approach to internal audit with the appointment of an *Internal Controller*, a senior and longstanding member of staff, with significant operational experience of, and insight into, NCA at HO and CO levels. The role of Internal Controller is broader in scope than the previous internal audit function and encompasses management of risk, compliance and global operational efficiency and effectiveness. It extends beyond finance to include other organisational systems and procedures, such as programming and human resources. The position has dual reporting lines to both the *Director of Finance* and the *GS*. The organisation has also initiated longer term planning horizons for global budgeting and costing, with a focus on achieving highest impact while maintaining quality standards, pivoting its accountability focus to place equitable importance on the demands of both donors and rights-holders.

While the impact of the recent management initiatives is yet to be fully realised (see 3.2), NCA considers three main work streams as critically important in addressing compliance, risk management and global governance in a more formalised and systematic way; these are:

- Streamlining of communication between HO and COs, with the introduction of the *Global Management Dialogue*, *Annual Assignment Letters* and the *Global Annual Calendar*.
- Comprehensive revision and digitalisation of NCA's *Operations Manual (OM)* to increase user accessibility and adherence to mandatory procedures: a clear link is provided between CHS indicators and organisational requirements.
- A reformed *Global Leadership Platform* with a focus on key areas of leadership to support leaders to address gaps; it aims to stimulate dialogue and support management at all levels of the organisation, with workshops, trainings, mentoring, etc.

NCA's Monitoring and Evaluation (M&E) system has been revised as part of the updating of the OM, with Country Advisors at HO who follow up M&E processes and data quality with COs. Partners are fully engaged involved in programme planning, assessment and monitoring processes. Internal and external audit processes are routinely conducted to address issues of compliance and value for money (VfM).

Key processes and primary operational tools (i.e. *OM*, *PIMS*, *Management Dialogues*) have been revised with a clear mandate to simplify content, facilitate communication across all levels of the organisation and to increase capacity to identify risk areas by facilitating improved information flow. There is widespread awareness among staff of ongoing updates and improvements, and recognition that progress has been made in terms of internal quality assurance and risk management. However, while updated tools and procedures are in the process of being rolled out and brought into use at CO level, and management systems are in place to support the systematic application of mandatory programme quality requirements, assessing the systematic application of these quality processes at CO, partner and community levels will be required at the next audit.

4.2 How the organisation applies the CHS across its work

NCA continues to be strongly committed to implementing CHS across all aspects of its work and demonstrates awareness of gaps in systematically assuring CHS standards are applied across all relevant aspects of its work. The organisation has made targeted efforts since previous audits to address key issues, particularly in relation to safeguarding and continued refinement of sensitive complaint handling and investigations. NCA developed a *CHS Recertification Action Plan (2020)* to address outstanding CARs and observations from previous audits; the plan identifies key functions in NCA that are best placed to address these. The *Division for Partnerships and Strategic Solutions (PASS)* appointed an additional staff member in October 2020, *Senior Civil Society and Programme Sustainability Advisor*, with responsibility for leading the development of resources to operationalise NCA's *Sustainability Standards* in programming, with particular responsibility for CHS. The CHS is consistently referenced and integrated into the revised OM across various key working documents. Processes have been revised with specific focus on improving accountability between HO and COs and information sharing with a risk management-oriented approach. Greater focus and resources have been directed towards environmental sustainability, including "greening" initiatives for HO and COs, however

organisational processes are not yet fully in place to mitigate potential negative effects on the environment.

While this audit has recorded no CARs, recognising that NCA is making systematic efforts towards applying the requirements of the CHS there are some areas of weakness noted that pose a potential risk to people and communities if the current policies, processes and tools that are currently being rolled out are not routinely applied in all COs. These risks relate primarily to inclusion of vulnerable groups, potential negative effects in relation to the local environment, safeguarding of sensitive information, SHEA and access to appropriate complaint handling mechanisms.

4.3 PSEA

NCA continues to strengthen its policies and procedures for the prevention of SEAH across its offices, partners and programmes. The newly introduced *PSHEA / CS Policy (2021)* and associated implementation plan for cascading to COs and partners, provides additional mechanisms to mitigate SEAH risks, including extra screening for staff in certain roles and a pathway for supporting people who are survivors of SEA (*Sexual Violence Response Plan*) and the appointment of PSHEA and CP Focal Points in each CO. NCA tracks and monitors all sensitive complaints including those relating to SEA, manages investigations on SEA with support from an external expert, and tracks these for reporting to the Board and publicly in its *Global Complaints Report*. NCA is also in the process of rolling out guidance for survivor assistance designed to respond to SEAH allegations and incidents, setting out NCA's twofold role in response: to conduct an investigation against the alleged perpetrator and to provide quick and effective support to the survivor. Guidance for the establishment of safe and confidential survivor-centred and child friendly referral processes are also outlined.

NCA has processes in place to ensure all staff and partners are fully aware of policies related to zero-tolerance of SEAH and Do No Harm (DNH). Staff and partners indicate a clear understanding of the associated codes of conduct, PSEAH policies, mandatory reporting requirements and responsibilities to ensure communities are made aware of expected standards of behaviour. Communities demonstrate awareness of expected behaviours of staff and confirm that information relating to CoC and PSEAH had been shared with them.

4.4 Localisation

NCA's *Global Strategy, Faith in Action*, reasserts the organisation's commitment to working with local civil society partners and to supporting religious leaders and their constituencies to address the root causes of poverty, violence, and injustice in their own societies. Localisation aligns closely with NCA principles and values and its approach to partnership. NCA's *Programme Framework 2020-30* details how to strengthen civil society and recognises that cooperating with and strengthening local actors' capacities for humanitarian response increases the resilience of these actors and civil society, and can help bridge the gap in the humanitarian-development nexus. NCA is a signatory to the Charter for Change (C4C) and while it confirms that more than 25% of funding is transferred to national and local partners it does not analyse or publish specific data in this regard.

In NCA's advocacy work the organisation is particularly focused on foregrounding the rights, participation and voices of local actors and communities, and ensuring their representation in messaging directed towards duty bearers at national and regional levels. NCA's advocacy partners recognise the role NCA plays in facilitating its partners to work closely with grassroots organisations and marginalised communities to ensure communities and national and local advocacy actors can come together to advocate on issues of shared concern.

4.5 Gender and diversity

NCA performs quite well on gender and diversity. The organisation is committed to gender and conflict sensitive programme design and to advancing gender equality across all its routines and procedures. This includes ensuring the active participation of all marginalised groups, irrespective of their faith, ethnicity, sexual orientation, or gender identity. Partners are required to include consideration of gender and age analysis inclusion in their planning and reporting. Staff and partners show a shared commitment to women's participation and empowerment and demonstrate the technical skills and capacities to deliver gender and age sensitive programming.

4.6 Organisational performance against each CHS Commitment

Commitment	Strong points and areas for improvement	Feedback from communities	Average score*
Commitment 1: Humanitarian assistance is appropriate and relevant	<p>NCA continues to perform well against the organisational responsibilities and key actions of this indicator. NCA analyses context at the macro level through strategic planning processes and coordination mechanisms and at the micro level through project proposal development and dialogue with partners.</p> <p>The highly “localised” operational model allowed adaptation and continuation of NCA’s programmes despite challenges posed by the COVID-19 pandemic. As a partnership-based organisation, NCA puts a strong focus on collaboration and capacity development.</p> <p>NCA disaggregates data by sex, age though not systematically by ability.</p>	<p>Communities feel that proposed activities are appropriate and relevant to their needs and that, through dialogue with NCA staff and its partners, they would be able to orient the programme in case of changing needs.</p>	2.7
Commitment 2: Humanitarian response is effective and timely	<p>Systems continue to be in place to ensure quick decision-making during crisis. Rapid response mechanisms are in place and EPRPs were found to be in place at CPs level.</p> <p>NCA’s approach to emergencies focuses on how to deliver the most timely and effective response, with certified and agreed standards.</p> <p>A consistent use of risk assessments tools is observed, and risks are routinely discussed with partners. Monitoring tools and processes have been significantly revised to flag and address potential risk areas more systematically, although they are not all fully rolled out.</p> <p>Interviews with partners confirm that their capacity development needs are regularly assessed.</p>	<p>Communities perceive assistance as being delivered on time and with appropriate capacities and skills.</p>	2.9
Commitment 3: Humanitarian response strengthens local capacities and avoids negative effects	<p>NCA is committed to strengthening local capacities, and this is reflected across policies and practice. Support for local ownership and locally led action remains a core element of NCA’s work, and its strong partner-based approach reflects localisation commitments.</p> <p>Continual monitoring and risk assessments are mechanisms used to identify, assess, and mitigate potential SEAH on an ongoing basis, but there are still gaps in the way complaints are formally collected and recorded at partner level.</p> <p>NCA’s programme priorities reflect a commitment to the protection of vulnerable people, particularly in relation to risks related to GBV and people vulnerable to violence in conflict affected communities. PSEAH trainings for staff and partners are organized to mitigate SEAH and roll out new policies.</p> <p>Despite an overall focus put on environmental sustainability (also in terms of reducing impact of NCA’s operations), organisational processes are not yet fully in place to systematically identify and act upon potential negative effects on the environment.</p>	<p>Communities are aware of the expected conduct of NCA staff and its partners. Communities say they would feel comfortable to report any rising or potential negative issue and that the activities implemented had positive effects on the local economy.</p>	2.6

<p>Commitment 4: Humanitarian response is based on communication, participation and feedback</p>	<p>Open information sharing and participation continue to be core values and principles of NCA. The Partnership MoU describes a shared commitment to provide key information to people and communities who NCA and partners work with. Project planning tools require articulation of strategies for information sharing with communities and how target groups, including marginalised groups and individuals, will be involved in follow up, reflection and learning during implementation. Project monitoring includes assessment of partners' work in relation to accountability, including how they interact with rights-holders and host communities.</p> <p>At a global level NCA has updated its Communications Strategy which explicitly references the CHS and is also finalising a new Advocacy Strategy and Handbook, which highlights the importance of maintaining transparency and accountability towards rights-holders that NCA seeks to represent through its advocacy work.</p> <p>NCA's tool for providing key information about NCA, its principles, CoC, CHMs, partners and programmes is contextualised at CO level and shared with partners and communities. However, oversight of the planning, monitoring and reporting of information dissemination by partners to communities is not yet systematically embedded in NCA procedures and routines.</p>	<p>Community indicate they feel informed about NCA and its partners and are engaged with project activities and have regular opportunities to meet and consult with NCA and partners. Communities have received training from NCA partners on how to recognise appropriate and inappropriate staff behaviour, what to expect regarding the conduct of staff and how to complain if staff violate these expectations.</p>	2.7
<p>Commitment 5: Complaints are welcomed and addressed</p>	<p>NCA continues to invest significant resources and demonstrate sustained commitment to ensuring that complaints are welcomed and addressed at all levels and to ensure robust processes are in place to address sensitive complaints. Staff at HO have received investigations training and are supported by an external consultant with PSEAH expertise where required. The organisation publishes an annual complaint report which provides details of the outcome of investigations.</p> <p>The CHM is reinforced by the introduction of a new <i>PSHEA/CS Policy (2021)</i> which is a companion policy to the CoC meaning staff will be regularly trained and updated on it, and it will be signed as part of the contract of employment.</p> <p>The outstanding CAR issued against this indicator (5.6) is closed at this audit however, an observation is maintained. While NCA has taken steps to ensure that communities and people affected by crisis are consistently consulted on complaints-handling processes, these systems are not yet fully rolled out across all NCA COs yet.</p>	<p>Interviews with communities confirm that they have received information about the NCA complaint mechanism and are clear on how to raise a complaint or concern. Communities believe NCA and partner complaint handling procedures to be fair, and express confidence to use them if required.</p>	2.6
<p>Commitment 6: Humanitarian response is coordinated and complementary</p>	<p>NCA continues to have a strong commitment towards coordination in its policies and practice and routinely expresses it with all relevant stakeholders, including national and local actors.</p> <p>Coordination and complementarity principles apply at governance, management and operational levels. Information is shared through monitoring and reporting, partners' meeting and constant dialogue, both internally, externally and with partners.</p> <p>Relevant staff attend coordination and working groups, communicate clearly and transparently on programme objectives, plans and resources available to partners and other stakeholders involved in NCA programmes.</p>	<p>Communities feel that there's a good cooperation with NCA staff and its partners, and expressed satisfaction on how coordination on programmes and activities is being handled.</p>	3

	NCA publishes an annual <i>Global Complaints Report</i> (from 2020) which includes details on learning from complaint processing at CO level and at the institutional level globally. Individual learning reports have been generated on sensitive cases and learning sessions facilitated with staff on complex and more serious complaints.		
Commitment 7: Humanitarian actors continuously learn and improve	<p>NCA has further invested in its ambition to be a learning organisation and the recently introduced new <i>Knowledge Management (KM) Strategy</i> (2021) articulates a KM architecture to leverage data and information for learning and improvement. The organisation distinguishes between two categories of evaluation: at CO level the focus is on accountability while at a global level (HO led) the focus is on learning.</p> <p>There are various communities of practice (CoP) at CO level and the team responsible for Methods, Evaluation and Learning (MEL) at HO is currently focused on supporting CoPs to increase their learning capacity through piloting digital CoPs cross-organisationally. There is also an online 'expertise locator' to help facilitate greater access to expertise across NCA.</p> <p>Partner reporting includes sharing lessons learned and success stories, and partners come together in regional or technical clusters to discuss lesson learned to help shape future approaches. In its advocacy work NCA is recognised by its partners as an important contributor to supporting innovative approaches to the generation and sharing of knowledge and learning for advocacy.</p>	Interviews with communities indicate they are satisfied that learning is shared by partners and NCA and point to opportunities for coming together and sharing learning with other community groups.	3
Commitment 8: Staff are supported to do their job effectively, and are treated fairly and equitably	<p>NCA has also taken significant steps to reorganise and streamline how it effectively manages communications and expectations between HO and COs to ensure leadership capacity is nurtured and sustained. A new Executive Leadership Programme (2021) focuses on developing leaders at different levels across the organisation.</p> <p>Staff show strong understanding of updated policies relevant to them. Staff were oriented on the new <i>PSHEA / CS Policy</i>, had participated in relevant trainings and were involved in the preparation of CO implementation strategies for policy implementation including the training and orientation of partners</p> <p>For staff who are involved in the investigation of sensitive complaints NCA now offers debriefing from a psychological support service given the strain and emotional demands that can be made on staff during complex investigations.</p> <p>NCA partner dialogue processes require review of partner capacity in field security in all medium/high risk areas and NCA's role in enhancing this. Partners confirm that NCA has provided advice and support on helping partners keep staff safe during the COVID-19 pandemic.</p>	Communities perceive NCA and partner staff as competent and knowledgeable. They appreciate their regular interactions and engagement with NCA and partner staff and consider their behaviour to be professional.	3
Commitment 9: Resources are managed and used responsibly for their intended purpose	<p>NCA continues to have effective systems in place for budgetary planning and for monitoring and reporting of expenditure against budget and NCA follows robust financial monitoring processes with partners.</p> <p>NCA senior leadership is conscious of the need to maximise the allocation of available resources to the communities NCA serves and minimise inefficiencies and reviewed and adapted its approach to internal audit with</p>	Communities confirm that they were provided with information on the code of conduct and expected behaviour, including that staff should not be corrupt or bribe anyone; they	2.8

	<p>the appointment of an <i>Internal Controller</i> whose role includes review of risk management and global operational efficiency and effectiveness.</p> <p>Processes for identifying and managing risk are increasingly well established at HO and CO and staff and partners show clear understanding of NCA's standards and policies on the prevention of fraud and corruption.</p> <p>NCA has adopted a <i>Climate and Environment Policy</i> (2021), with provisions for reduction in air travel, more sustainable CO operations, increased environmental sustainability in programmes and a greener approach to logistics and supply chain management to minimise negative environmental impact. However, the organisation does not yet systematically ensure environmental considerations in relation to impacts on local and natural resources are addressed in partner project proposals</p>	perceive NCA and partner staff as ethical.	
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* *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 non-conformities

Corrective Action Requests (CAR)	Type	Resolution due date	Date closed out
2017 - 5.6: NCA does not ensure that communities and people affected by crisis are fully aware of the expected behaviour of NCA or partner staff, including commitments on the prevention of sexual exploitation and abuse.	Minor	20-05-2021	2021/10/27
Total Number	0		

6. Sampling recommendation for next audit

Sampling rate	As per normal HQAI guidelines for sampling. Despite the auditors' overall confidence with the audit findings there is some risk due to the fully remote nature of the audit and the somewhat limited extent of the community consultations conducted (see 1.4 above). It is recommended that the next audit (MA) considers the inclusion of one onsite visit with a focus on gathering evidence at the project site level and through community consultations.
Specific recommendation for selection of sites	<p>The selection of sites for the next audit should consider a context where NCA is implementing humanitarian programming with a view to assessing:</p> <ul style="list-style-type: none"> • Systematic assurance of community-level awareness of the expected behaviour of staff • Systematic assurance of community-level engagement with and knowledge of complaint handling mechanisms • The extent to which the revised OM and PIMS are working effectively, and associated tools and templates are being used systematically • Progress on the rollout of the new PSHEA and CP Policy (2021) and associated procedures to staff, partners and communities • Consistent consideration of environmental impact • Progress towards greater disability inclusion

7. Lead auditor recommendation

In our opinion, NCA 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 is implementing the necessary actions to close the minor CARs 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: Joanne O'Flannagan



 Joanne O'Flannagan

Date and place:

27th October 2021, Belfast

8. HQAI decision

Certificate:

Certification maintained
 Certificate suspended

Certificate reinstated
 Certificate withdrawn

Next audit: Surveillance audit before 2022-11-12

Name and signature of HQAI Executive Director:



 Pierre Hauselmann

Date and place:

12 November 2021, Châtelaine

9. Acknowledgement of the report by the organisation

Space reserved for the organisation

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

Yes No

If yes, please give details:

Acknowledgement and Acceptance of Findings:

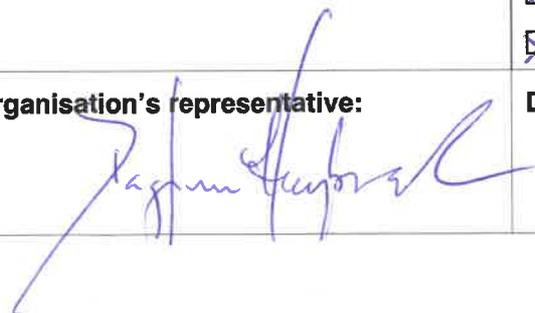
I acknowledge and understand the findings of the audit

Yes No

I accept the findings of the audit

Yes No

Name and signature of the organisation's representative:



Date and place:

Oslo, 16/11-2021

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

* Scoring Scale from the CHSA Verification Scheme 2020