



Third-Party Observations of Interest (TPOI) Procedure

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Third-Party Observations of Interest (TPOI) Procedure

Introduction

I. The Humanitarian Quality Assurance Initiative

HQAI's objective is to improve the Quality and Accountability of organisations working with vulnerable and at-risk populations through the provision and promotion of meaningful and adapted independent quality assurance. Its services are intended to build capacity in the sector and provide consistent, measurable data in the delivery of quality action, thus improving principled, accountable, efficient and equitable provision of aid to vulnerable and at-risk populations.

To all its stakeholders, HQAI is an accountable, open and trustworthy partner which applies the internationally recognised ground rules of auditing. These include competence and due care, confidentiality, evidence-based and risk-based approach, fair presentation, impartiality, independence, integrity, openness, and responsiveness to complaints and appeals. Our policies, procedures and tools for independent quality assurance follow relevant ISO standards requirements. HQAI's CHS certification scheme is accredited against ISO/IEC 17065:2012.

HQAI has developed robust tools to measure efficiently where an organisation stands in relation to the [Core Humanitarian Standard \(CHS\) on Quality and Accountability](#). Tools related to other standards may be developed in the future.

HQAI is committed to the nine fundamental principles of the CHS and implements them as far as they are applicable to its own activities.

These are:

- transparency and participation in decision-making
- delivery of timely services that respond to the needs of users
- delivery of services that are accessible to local and national actors
- avoidance of negative impacts of our work on people and the environment
- provision of safe and accessible complaint mechanisms
- delivery of services that are coordinated with, and complementary to, the work of partners and stakeholders
- continual adaptation and improvement of services based on feedback and learning
- effective management of staff, including non-discrimination
- responsible and ethical use of resources

II. Scope

This procedure defines how HQAI manages Third-Party Observations of Interest (TPOI). A TPOI refers to a complaint raised by an individual, group, organisation or community about the activities of an organisation audited by HQAI, or the conduct of that organisation's personnel.

TPOI fall outside the formal scope of HQAI's complaint mechanism, which is governed by POL048 and PRO048. However, HQAI considers TPOI potentially relevant and may take them into account indirectly within the audit process. This document sets out the procedure for handling TPOI within HQAI.

The following referenced documents can usefully complement this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO/IEC 17065 - Conformity Assessment Requirements for bodies certifying products, processes and services (2012)

HQAI POL114 and PRO114 - Third-party quality assurance policy and procedure

HQAI POL048 and PRO048 - Complaint management policy and procedure

HQAI GUI104 HQAI Manual for Auditors

IV. Definitions

Unless specified below and in the text, for the purposes of this document, the terms and definitions provided in POL114-Quality Assurance policy apply.

TPOI:	A Third-Party Observation of Interest (TPOI) is a complaint from an individual, group, organisation or community about the activities of an organisation audited by HQAI, or the conduct of that organisation's personnel . It is of interest to HQAI because it might be deemed sufficiently relevant to be considered indirectly as part of the audit process.
Complaint:	A report about a perceived or real issue raised by an individual, group, organisation or community reporting a level of dissatisfaction, discontent or concern with the conduct or behaviour of HQAI staff, contracted personnel (including auditors), interns, volunteers and members of HQAI governance bodies. Complaints are ruled by POL048 and PRO048.
Complainant:	The individual, group, organisation or community lodging the TPOI.
Complaints Officer/Handler:	The staff member of HQAI appointed to manage the TPOI. This could be a HQAI staff member with duties related to managing complaints within their Job Description.
Subject of TPOI:	The organisation and/or individual/s who the complainant alleges have behaved in a way that the complainant feels is unsatisfactory. There could be multiple subjects of a TPOI.
Stakeholders:	In the context of this procedure, stakeholders include any individual, group, organisation or community that HQAI has directly or indirectly engaged with.
Serious TPOI:	A TPOI about the conduct or behaviour of an organisation and/or individual/s that represents a significant deviation from the expectations regarding audited partners. Serious TPOIs could include alleged or actual 'Acts of Misconduct' as described in the HQAI Code of Conduct or acts that put the complainant at immediate risk. HQAI can apply its discretion to treat other misconduct as a serious TPOI.
Non-serious TPOI:	A TPOI about the conduct or behaviour of an organisation and/or individual/s that is not defined as a serious TPOI.

Background

HQAI recognises that Third-Party Observations of Interest (TPOI) concerning audited organisations can enhance its understanding of an auditee’s compliance with the Core Humanitarian Standard (CHS) on Quality and Accountability, or other relevant reference standards. To support this, HQAI has established a process for managing TPOI within its audit framework.

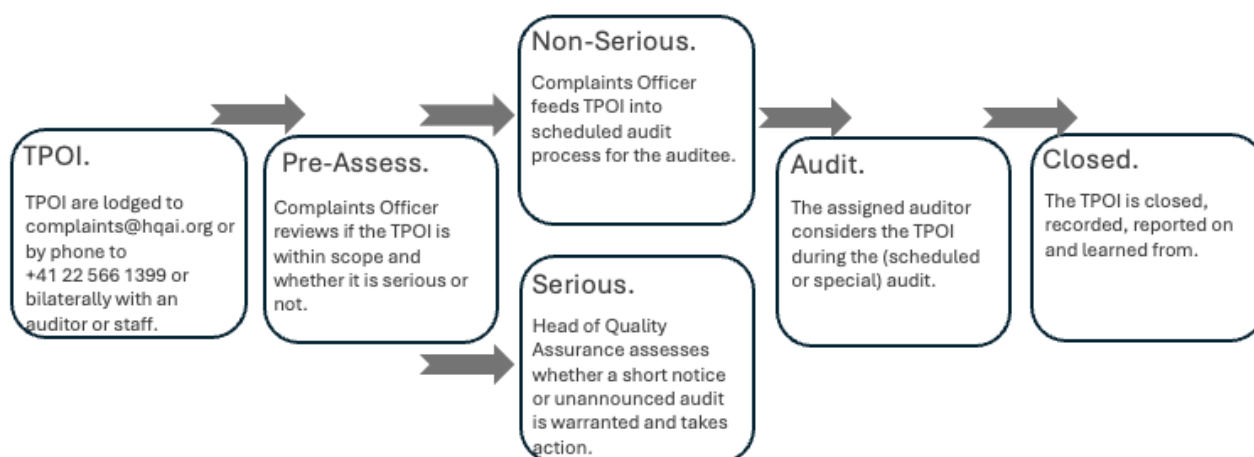
It is important to note that HQAI neither has the mandate nor resources to investigate TPOI related to the work of auditees, whose combined reach covers a significant proportion of the global population.

Since HQAI does not conduct investigations, in-scope TPOI are instead incorporated into the audit process. Consequently, there may be a considerable delay between the submission of a TPOI and its consideration by an auditor, particularly for non-serious TPOI. The timing also depends on the auditee’s audit scheme, as only certification schemes foresee annual surveillance audits.

Accordingly, the TPOI process should be understood as distinct from formal complaints or investigations.

Flowchart

The following chart summarises the TPOI process described in detail in this procedure. The flowchart is simplified, hence incomplete, and serves to illustrate the overall process.



1. Receiving a TPOI
 - 1.1 A TPOI can be received through HQAI’s complaint channels, including the following
 - 1.1.1 By E-Mail to complaints@hqai.org.
 - 1.1.2 By phone to +41 22 566 1399.
 - 1.1.3 Orally to an HQAI auditor or HQAI representative.
 - 1.3 A TPOI can come to the attention of HQAI by other means, such as the media, and be lodged by HQAI representatives.
 - 1.4 The complainant shall provide at minimum the following information:
 - i. Name of the organisation and/or individual(s) the TPOI is about (“subject of TPOI”)

- ii. Name, function or other information describing the relationship between the complainant and the subject of TPOI.
- iii. Description of the concern and how it relates to the quality assurance work of HQAI on the organisation that is subject of TPOI.
For example: how does the TPOI relate to the organisation's certification against the Core Humanitarian Standard on Quality and Accountability?
- iv. Whether they have complained to the subject of TPOI about the matter.
- v. Any relevant support documentation as attachments.

2. Acknowledging a TPOI

- 2.1 The complainant receives an acknowledgement from HQAI indicating that their TPOI has been received. The acknowledgement can be given orally (if received by phone or bilaterally) or through an automated generic E-Mail response.
- 2.2 Stakeholders lodging a TPOI should be aware that their TPOI will be dealt with in due time, even if they are not involved in the process.
- 2.3 TPOI are not dealt with through systematic feedback loops with complainants. HQAI will only reach out to complainants if deemed necessary particularly to understand how the TPOI relates to the quality management system of the organisation that is subject to TPOI.

3. Role of the Complaints Officer/Handler

The Complaints Officer will usually be the first point of contact for TPOI and will act as the Complaint Handler to initiate first steps.

- 3.1 For each TPOI the Complaints Handler shall create a record of the TPOI and assign a unique identifier.
- 3.2 The Complaints handler will triage each TPOI and determine whether the TPOI is within scope and whether it is serious or non-serious.
 - i. If the matter is not related to the performance of an audited organisation under one of HQAI's audit schemes, the Complaints Handler will close the TPOI as out of scope.
 - ii. If the matter is within scope, the Complaints Handler will record whether it is serious or non-serious and proceed accordingly. If unsure about classification, the Complaints Handler will discuss the matter with the Head of Quality Assurance.
- 3.3 HQAI is not obliged to consider TPOI that it has assessed as frivolous, malicious or vexatious.
- 3.4 For each TPOI within scope, the Complaints Handler informs the HQAI Quality Assurance Department as follows:
 - i. Information to the Audit Co-Ordinator and the relevant Supervisor Auditor that an in-scope TPOI was filed for a specific organisation (subject of TPOI). The identity and data of the complainant is kept confidential.
 - ii. The Complaints Handler will respect privacy and confidentiality and will only share information that is required with people on a need-to-know basis.

- iii. For a TPOI that is filed during an ongoing audit, the Complaints Handler refers to the Supervisor Auditor in charge within three (3) days to assess whether the TPOI can still feed into the audit or not.

Note: also see 4.3 - the consideration of TPOI should not alter aged standard audit timelines.

3.5 For each TPOI within scope, the Complaints Handler informs the subject of TPOI as follows:

- i. Information to the Audit Focal Point of the organisation (subject of TPOI) that an in-scope TPOI was filed against them. The identity and data of the complainant is kept confidential.
- ii. Information about the TPOI process, including by sharing the present Procedure and further communication as requested under section 5.

4. Subsequent tasks in non-serious TPOI

4.1 A non-serious TPOI will inform the next scheduled audit of the subject of TPOI.

Note: Under the certification scheme the TPOI will be covered through annual surveillance audits. Under other schemes, such as Independent Verification, the timelines may be significantly longer.

4.2 The Complaints Handler ensures that the auditor assigned to the next audit is made aware of the existence of the TPOI via relevant HQAI audit tools.

- i. The Complaints Handler logs a summary of essential anonymised TPOI information in the relevant section of ADM138.
- ii. The Complaints Officer ensures the Supervisor Auditor and Audit Co-Ordinator are made aware of the TPOI as described under 3. Role of Complaints Handler.

4.3 In general, the consideration of TPOI should not alter standard audit timeframes. If there are changes to the timeframe, these need to be communicated as additional audit costs to the audited organisation (subject of TPOI).

5. Subsequent tasks in serious TPOI

5.1 For serious TPOI the Complaints Handler refers to the Head of Quality Assurance and/or Supervisor Auditor within three (3) days to assess next steps.

5.2 If possible, the Complaints Handler shall establish whether the matter has already been raised with the subject of TPOI and whether the complainant consents to HQAI discussing the matter with the subject of TPOI.

Note: Should the complainant wish to remain anonymous or the matter not shared, this will limit the extent to which the matter can be used by HQAI for next steps.

Note: If necessary and as far as possible, the Complaints Officer shall advise the complainant of appropriate agencies that they can direct their immediate complaint to and/or receive support from.

5.3 The Head of Quality Assurance is responsible to assess whether the TPOI meets the threshold for instigating a special audit. To determine whether a short notice or unannounced audit is warranted, the Head of Quality Assurance needs to assess whether the TPOI suggests there is a systemic failing in the systems of the subject of TPOI.

Note : Short notice and unannounced audits are ruled by PRO114 Third-party quality assurance procedure.

6. Role of the Auditor

The Auditor can be the first point of contact for a TPOI (if addressed directly during an ongoing audit) or can be assigned to auditing an organisation that is the subject of a previously filed TPOI.

- 6.1 If the auditor is the first point of contact for a TPOI, they will contact the Complaints Handler to create a record of the TPOI and go through relevant steps as described under 3. Role of Complaints Handler.
- 6.2 If the auditor is assigned to audit an organisation that is the subject of a previously filed TPOI, they will learn about the existence of the TPOI through relevant HQAI audit tools (ADM138 or Terms of Reference for a special audit).
- 6.3 The auditor will consider the TPOI during audit scoping (in the case of an Initial or Renewal Audit) and/or to identify any significant organisational changes or risks that could affect an organisation's compliance (in the case of a Maintenance Audit).

Note: The auditor has no mandate to investigate the matter but will use the information from the TPOI as one source of evidence to inform their findings during the audit process.

- 6.4 As part of the use of the TPOI, the auditor may need to corroborate evidence and information provided by the complainant. Only if necessary, the auditor will request access to the complainant's contact data from the Complaint Handler.
- 6.5 As part of the audit, the auditor should make relevant comment on the TPOI, including how the TPOI was treated during the audit when completing relevant HQAI audit tools (audit report or ADM138).

7. Role of Supervisor Auditors

- 7.1 Supervisor Auditors should ensure that all Auditors are aware of how to report a TPOI and how to treat TPOI that relate to audits they are conducting.
- 7.2 For each TPOI, during the audit preparation, Supervisor Auditors should check that auditors have included an appropriate level of consideration of the TPOI in their approach to the audit.
- 7.3 If the lead auditor and Supervisor Auditor assess that the TPOI cannot be treated within the agreed scope of the audit, they shall immediately advise the Complaints Officer/Handler and the Head of Quality Assurance.

Note: HQAI shall be cognizant of the expectation that TPOI will be treated in the same way as other pieces of evidence during the audit and thus, will not cause any significant expansion of audit scope or resourcing requirements.

8. Closing a TPOI

- 8.1 TPOI are closed in the following circumstances:
 - i. the TPOI is determined to not relate to the CHS or another audit framework;
 - ii. the TPOI was addressed through an audit.
- 8.2 Where relevant, HQAI will identify any learning related to the TPOI process and include it in the continuous improvement plan of HQAI.