

Concern Worldwide: Mid-term audit - Summary Report - 2020-01-30

General information

Organisation	Concern Worldwide			
Туре	Mandates		Verified mandates	
 National International Membership/Network Federated Direct Assistance With partners 	 ☐ Humanitarian ☐ Development ☐ Advocacy 		 ➢ Humanitarian ➢ Development ➢ Advocacy 	
Head office location	Dublin, Ireland			
Total number of country programmes	22 Total number of staff 35		3555	

Audit team

Lead auditor	Nik Rilkoff
Second auditor	Nina Wöhrmann
Third auditor	
Observer	
Expert	
Other	

Scope of audit

	CHS Certification	CHS Independent	CHS Benchmarking	Other
	CHS Certification	Verification		
Initial audit				
First maintenance audit				
Mid-term audit	\square			
Second maintenance audit				
Recertification audit				
Extraordinary audit (shortly explain)				
Short notice (shortly explain)				
Other: (shortly explain)				



Verified indicators for this audit

CHS Commitment	Organisational Responsibilities	Key Actions	Observations and CARS from previous audit(s): IA2017 and MA2018
1	1.5	1.1 1.2 1.3	Observation 1.5: Observation: Concern's policies and partnership agreements are not consistent in the required level of data disaggregation.
2	2.6 2.7	2.1 2.2 2.3 2.4 2.5	Observation 2.1: There are no formal processes to analyse specific risks to programme participants Observation 2.6 : Concern's organisational capacity sometimes lags behind programme commitments.
3		3.1 3.2 3.3 3.4 3.5 3.6	Observation 3.4 : Concern does not systematically develop transition strategies in protracted emergencies and slow onsets CAR 3.6 : Concern does not systematically identify all potential and unintended negative effects, particularly regarding safety, security, culture, social and political relationships, and the environment.
4	4.5 4.6 4.7	4.1 4.2 4.3 4.4	 Minor CAR 4.1.: Concern and partners do not systematically share information about the principles they adhere to and about expected behaviour of staff. Observation 4.4: Observation: Concern does not systematically record and respond to community feedback and does not systematically pay attention to the sex, age and gender diversity of those providing feedback. Observation 4.5: Concern does not ensure policies on information sharing in communities are systematically known amongst staff and partner staff. Observation 4.6: Observation: Policies for engaging communities do not require staff to consider the risks communities identify in all stages of the work.
5	5.6	5.1 5.2 5.3	 Observation 5.1.: Concern does not systematically consult communities on the design, implementation and monitoring of complaints-handling processes. Minor CAR 5.2.: Concern does not systematically communicate the full scope of the CRM, especially on SEA. Minor CAR 5.3: Concern's CRM and investigation guidelines and practices do not systematically provide for timely and appropriate complaints handling that prioritises the safety of the complainant and those affected at all stages.



			Observation 5.3: Concern does not systematically monitor partners' complaints handling processes to ensure they are timely, fair, appropriate and prioritise the safety of the complainant and those affected at all stages. Minor CAR 5.6.: Communities are not fully aware of the expected behaviour of staff and partner staff, including commitments on the prevention of sexual exploitation and abuse. Observation 5.6.: Concern does not monitor that staff of partner organisations are aware of Concern's policies and information sharing obligations. These do not explicitly include PSEA.
6		6.1 6.2 6.3 6.4	
7		7.1 7.2 7.3	Observation 7.3 : Concern does not systematically share learning with communities.
8	8.4 8.5 8.6 8.7 8.8 8.9	8.1 8.2 8.3	 Observation 8.3: Some staff struggle to access appropriate training and development opportunities due to time, budgetary, and connectivity constraints. Observation 8.4: Concern's management and staff capacity to deliver its programmes is tested in challenging contexts, which is partly due to comparatively unattractive staff remuneration, terms and conditions Observation 8.6: Concern's PDR completion rate at HO is not clear and the PDR tracker is incomplete
9	9.6	9.1 9.2 9.3 9.4 9.5	Observation 9.1 : Concern does not consider environmental impact in programme design. CAR 9.4 : Concern does not produce formal guidance on environmental impact assessments and generally does not formally consider the environmental impact of using local and natural resources. Observation 9.6 : Concern does not have guidance on using its resources in an environmentally responsible way

Sampling

Random	Included in	Replaced by	Rationale/ Comments	Selected for Onsite visit / Remote
	final sample (yes/no)		(If random sample not included explain why and	assessment



					ASSURANCE INITIATIVE
				give rationale for selected country programme)	
1.	Haiti	No	Bangladesh	The programme is relatively small and does not have a partnership element (given Concern's growing focus on partners, the audit scope was to include this component)	
2.	Bangladesh	Yes		With most of the country programme implemented by partners (the exception being the Cox's Bazaar emergency response), this was appropriate to include.	Onsite
3.	Lebanon	Yes			Remote (document review)
4.	Somalia	Yes			Remote (interviews and document review)

<u>Other sampling performed for this audit</u>: With the logistical uncertainty of accessing the Concern humanitarian programme in Cox's Bazaar, and the accessibility of partner-based development programmes within Dhaka, the audit team sampled development programmes only. It is therefore recommended that partner-based humanitarian programmes be included in the re-certification audit.

Additionally, it is important to note that communities sampled were participants in projects implemented by Concern's partners in Dhaka. Given the focus of the audit on Concern's work with partners, there was no opportunity to interview communities involved in directly implemented programmes, so all feedback from communities in the report is from those working with partners.

Also, at the stage of sampling for this mid-term audit, HQAI had advised we were to check the organisational responsibilities of three commitments only (commitments 2, 4 and 8) unless there were observations within other organisational responsibilities, which there were (1.5, 5.6). Key actions for all commitments were included.

It is important to note that the audit findings are based on a sample of the country programmes and documentation etc. Findings are analysed to determine the organisation's systematic approach and application of all aspects of the CHS across different contexts and ways of working.

humanitarian quality Assurance initiative

Activities undertaken by audit team

Locations assessed (project level in country programmes)	Dates	On-site / Remote
1. Dhaka, Bangladesh: Improving health and nutrition status of urban extreme poor in Bangladesh through sustainable health service provision (HNPP) in Kunipara, Madda Badda, Uttar Badda	07.10.2019	On site
2. Dhaka, Bangladesh: Improving the Lives of Urban Extreme Poor (ILUEP) in Karwan Bazar (West Tejturi Bazar), Chan Mia Slum, Tibbot Sishu Poribar Slum, Maniknagar Pavement Dwellers' Centre	10.10.2019	On site
3. Somalia/Somaliland: Coordinated Implementation of Mulitpurpose Cash Assistance to support Somali Households affected by crisis.	1617.10.2019	Remote (Documents + Skype interviews)
4. Somalia: Assistance to Conflict and natural disaster affected IDPs and rural communities in Banadir and Lower Shabelle	1617.10.2019	Remote (Documents + Skype interviews)
5. Lebanon: Strengthening the resilience of refugees and host communities impacted by the Syrian Crisis	1617.10.2019	Remote (Documents)
6. Lebanon: Emergency WASH intervention in Akkar 2019	1617.10.2019	Remote (Documents)

Interviews

Position of interviewees	Number of interviewees		
	Female	Male	
Head Office	6	5	
Country programme(s)	7	6	
Project site(s)	7	8	
Total number of interviews	20	19	



Consultations with communities

Type of Group	Number of participants		
	Female	Male	
#1 & #2, Purbachal Road, Uttar Badda, community members accessing health services through vouchers (HNNP)	10	8	
#3 & #4, Near BRAC Maternity Centre, Kunipara, community members accessing health services through vouchers (HNNP)	13	8	
#5 West Tejturi Bazar, livelihoods / vocational skills (ILUEP) participants	14	0	
#6 Chan Mia slum near Tejgoan Railway station	0	9	
#7 Tibbot Sishu Poribar Slum, livelihoods / vocational skills (ILUEP) participants	10	0	
#8, #9 Maniknagar Pavement Dwellers' Centre, livelihoods / vocational skills (ILUEP) participants	9	14	
Total number of participants	56	39	

Opening and closing meetings

At Head Office	Opening meeting	Closing meeting
Date	Monday, 16th October 2019	Wednesday, 30th October 2019
Location	Virtual (Germany, Ireland, New Zealand)	Virtual (Germany, Ireland, New Zealand)
Number of participants	3	3
Any substantive issue arising	None	Clarification questions and comments on issues presented. Auditor's evidence requests, Concern expressed reluctance on sensitive documents, HQAI risk-based audit document requirements explained, timeline agreed.



At Programme Site 1	Briefing	De-briefing
Date	Sunday, 6th October 2019	Thursday, 10th October 2019
Location	Dhaka, Bangladesh	Dhaka, Bangladesh and virtual (Ireland)
Number of participants	14 (approx.)	15 (approx.)
Any substantive issue arising	None	None

Lead auditor recommendation

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

Date and place:	Name and signature of lead auditor:
20 November 2019, Featherston, New Zealand	Nik Rilkoff



HQAI decision

Certification Decision		
Certificate:		
Certificate maintainedCertificate suspended	 Certificate reinstated Certificate withdrawn 	
Next audits Maintenance audit before 2020-10-10		
Pierre Hauselmann Executive Director Humanitarian Quality Assurance Initiative	Date: 2020-01-30	



Background information of the organisation

Governance and management structure	Concern Worldwide's governance and management structure has not changed significantly since the 2018 maintenance audit. The new Safeguarding Unit has been staffed with two people including a professional social worker with experience of vulnerable adults and children. Current organogram for Concern Dublin is doc Org 688.
Internal quality assurance	Concern's governance and quality assurance processes have been evolving since the 2017 initial and 2018 maintenance audits. The Safeguarding Unit is developing and implementing Concern's Safeguarding Framework and will ensure that the organisation meets all compliance, regulatory and accountability standards. A network of appropriately oriented and trained focal points will help to ensure that all who come into contact with Concern's work are protected from any form of exploitation and abuse. Concern has also rolled out a revised Code of Conduct (CoC), accompanied by associated policies on Programme Participant Protection, Child Safeguarding and Anti-Trafficking in Persons. One significant outcome of the previous CHS audits in Concern is the development and piloting of guidance and tools for monitoring unintended consequences. Additionally, programme quality guidance and the programme cycle management system are now fully online, providing guidance and toolkits for staff, as well as grant management capacity. Standard indicators, including for advocacy, allow aggregation of results. An online learning platform also facilitates staff technical and professional development.
Work with partners	In 2018, out of twenty-six* countries where Concern was operational, sixteen partially- or fully implemented their programmes through local partners, with approximately 9% of Concern's expenditure channelled through local partners. (*In 2019, Concern is working in twenty-two countries.) Concern recruited a Partnership Advisor in 2018 (the position had not been occupied since 2011) and in November 2018 a Partnership Workshop was held. In response to key recommendations from the workshop, Concern updated its local partner project agreement template, although there are still examples of new (2019) partnership agreements referring to the Humanitarian Accountability Partnership (HAP). The new templates include a stronger commitment to the revised Code of Conduct (CoC) and associated policies, and reference the CHS. Furthermore, CLOSAT (the Concern Local Organisation Selection Assessment Tool) and CLOFAT (the Concern Local Organisation Financial Assessment Tool) have been revised and merged into the <i>Concern Integrated Local Partner Assessment Tool</i> (CLIPAT). Key recommendations from the workshop also include the need to focus on safeguarding, both internally and with partners, and to clarify the duty to report, and 'who to report to' for partners. Gender equality, and training needs for partners (e.g. HR) and for Concern staff (e.g. partner management) were also identified as priorities. Concern drafted a Partnership Policy in May 2019 and Partnership Guidelines in August 2019 (Bangladesh also drafted Partnership Guidelines in September 2019).



Overall performance of the organisation

Effectiveness of the management system in resolving non- conformities	Concern's efforts to close the three CARs and address observations from the initial audit in 2017 include establishing three cross-departmental working groups on Monitoring Unintended Consequences, the Complaint Response Mechanism (CRM) and the Environment. Each is guided by a terms of reference (TOR), and their membership is diverse to ensure buy-in and ownership of both the non-conformities and the changes across the organisation. The working groups address the non-conformities through new and updated policies and guidelines at the level of the organisation's responsibilities, and then by rolling out changes to country teams. Concern's Environment Policy, Strategy and Key Actions have been finalised as this report is submitted. Systemic change at all levels will take time, and gaps remain on the partner and community (key action) level.
Overall application of the CHS	Concern's overall application of the CHS is strong in the Commitment areas that relate to the support that Concern provides. The assistance provided to communities is relevant, appropriate and timely. Assistance meets people's needs, there are robust considerations given to avoiding harm and monitoring unintended consequences in order to correct them. Concern is committed to coordination and supports country programmes to take a leadership role in this, as well as to develop and share learning in these forums. Concern's genuine and open approach to working with local organisations and governments contributes to longer term sustained outcomes in communities. Staff are competent, supported to do their jobs effectively, and well managed: Concern is investing in management skills and developing future managers for the organisation. Resources are also well managed, and with a very new environment policy and strategy to be rolled out in the next period, its environmental resource management practice will change. How Concern works in communities also has many positive aspects, including long term relationships with local organisations and very good examples of in-depth community safeguarding: identifying and seeking to prevent abuse and exploitation risks from arising; communities knowing the behaviour they can expect from staff; communities having access to safe and responsive complaint mechanisms. Organisational commitments in the form of the Safeguarding Unit and Framework are not yet fully realised in organisational practice at the community level. As an organisation that works with partners, Concern has an important role to ensure that programme participants engaged with partner-implemented programmes also have these rights, information and protection.



Organisational performance in the application of the CHS

Commitment	Strong points and areas for improvement	Feedback from communities	Average score ¹
Commitment 1: Humanitarian assistance is appropriate and relevant	Concern's policies commit to support the most vulnerable and poverty- affected, to impartial assessment of their needs and risks and to take into account the diversity of communities, including the needs of people with disabilities (PWD). Comprehensive tools are made available and country programmes are continuously analysing needs, context and stakeholders. Concern's policies are inconsistent in their required level of data disaggregation.	Communities say they have been consulted on their needs and that assistance was provided without discrimination. They approached staff for additional needs and suggested programme adaptions that have been realised.	2.5
Commitment 2: Humanitarian response is effective and timely	Concern's emergency preparedness framework guides teams to pre-plan for effective and timely emergency response. Detailed contingency planning is based on hazard and risk assessments, capacities and technical standards. Evidence-based advocacy with national and local authorities seeks to support institutional strengthening and improve overall responses to needs. Design-process innovations focussing on community engagement (CE) and participation contribute to understanding risks and mitigation and monitoring guidance indicates that risks are to be analysed, but safety and protection risks are not commonly presented in log frames.	Communities are satisfied with the timeliness of support provided by Concern's partners. They explain how partner staff support them with referral information for different needs, including guidance with legal processes and accompaniment to government services or offices.	2.9
Commitment 3: Humanitarian response strengthens local capacities and avoids negative effects	Concern's humanitarian programmes link to development interventions, systematically addressing Concern's three dimensions of extreme poverty (assets, inequality and risks and vulnerabilities). Resilience programmes build on existing coping mechanisms, integrating community early warning information with community-driven mitigation activities. Advocacy focusses on local system strengthening to contribute to sustainability of long-term service provision and poverty reduction. Concern and partners do not consistently develop exit strategies in the	Communities describe improved resilience from training, financial support and skills-development, which contribute to improved incomes. They discuss changes in their spending and saving capacity that positively influence their local economies. Women also describe	2.5

¹ In 2019 the CHS Alliance introduced a new scoring grid that now has five scales (0-4) instead of six (0-5). Score 5 has been taken off without affecting the definitions of the other scores.



	early stages of humanitarian and development programmes. Concern builds national NGO and local organisations' capacity to respond effectively to disasters and development needs, although project-level risk and vulnerability analyses are not systematically documented for marginalised groups, particularly in partner-implemented programmes. The 2017 initial audit found that Concern did not systematically identify all potential and unintended negative effects, particularly regarding safety, security, culture, and social and political relationships and the environment. In response, Concern has deepened guidance on context analyses, addressing culture, social and political relationships. They have also developed a new Monitoring Unintended Consequences (MUC) approach to survey communities and respond in a timely and systematic manner when issues arise. This does not identify and prevent potential negative effects from occurring, particularly those regarding safety, sexual exploitation and abuse.	multiple benefits of both economic and social empowerment.	
Commitment 4: Humanitarian response is based on communication, participation and feedback	Concern encourages and facilitates communities' feedback. Staff are described as being approachable and open to feedback. There are positive examples of engaging communities and facilitating their active participation. Gender equality and equal participation of community members is promoted in policies and practice. Information sharing is well placed in Concern policies, but not known to all staff. Concern does communicate in appropriate formats and languages, but does not consistently inform communities about expected behaviour of staff.	Communities report that they have little or no information about the (partner) organisation and its principles, but they do know about activities that are carried out by Concern or partners. Communities have limited awareness on expected staff behaviour. Communities feel positive about partner staff communication with them and feel consulted and asked for their feedback.	2.4
Commitment 5: Complaints are welcomed and addressed	Concern is generally welcoming and accepting of programmatic complaints. Communities are informed about how to access existing CRMs, but they are not systematically informed on the full scope of what they can complain about. Efforts are made to strengthen community consultation on CRMs, but this still needs improvement, especially with implementing partners. Guidance on CRM is available in HO and locally	Communities are not aware of the behaviour they can expect from staff, especially organisational commitments on the prevention of sexual exploitation and abuse. Communities have not	1.3



	in the countries sampled, but processes vary in different countries. Global CRM policies and investigations guidelines (the latter dating from 2011) provide comprehensive guidance on sensitive complaints handling, but safeguarding considerations are not fully included. Investigation and safeguarding practice needs to be systematically adapted to the policies, which themselves could be more consistent. Support to partners in dealing with complaints, particularly sensitive complaints, is not uniform. Much has been done since the initial audit to revise and strengthen policies related to expected staff behaviour, but there is room for improvement to communicate this to partners and especially to communities.	consistently been consulted about the design, implementation or monitoring of the CRM. Communities know about different ways of making complaints, but not about the full range of issues they can complain about. They are satisfied with the time for resolution of their complaints.	
Commitment 6: Humanitarian response is coordinated and complementary	Concern's humanitarian responses complement both national priorities and government-led interventions. Concern builds on capacities, defining responsibilities in community MoUs and supporting community-to- national communication and participation structures where they exist. Stakeholder mapping and capacity analyses assess interests, influence and importance. National, urban and rural policy actors are identified and included in Concern's evidence-based approach to advocacy. Concern leads and co-leads working groups and clusters, enabling Concern to influence good practice standardised operations beyond consortia partners.	Communities in development programmes did not mention duplication or overlap of programmes and organisations supporting them.	3
Commitment 7: Humanitarian actors continuously learn and improve	Programmes learn from experience and include this in the design of new programmes. Feedback and monitoring is used to learn and there are examples of where it has been used to implement changes. Positive examples of sharing learning and innovation internally and externally have been demonstrated, but sharing learning with communities needs improvement.	Communities say that learning from programmes has not been shared with them.	2.7
Commitment 8: Staff are supported to do their job effectively, and	A significant number of staff interviewed spoke of Concern's mandate and values with notable pride. Partner staff express appreciation for Concern's staff integrity. Concern's recruitment policies and practices seek to achieve a diverse workforce with the skills and capabilities to fulfil the organisation's commitments. Efforts to improve staff retention include	Communities were appreciative of Concern and partner staff, valuing their relationship with them, and respect they are shown.	2.9



		ASSURANCE INITIATIV
are treated fairly and equitably	more competitive salaries and increases in training and advancement opportunities. Concern's Competency and Leadership Frameworks state standards and expectations for staff to follow, and support the identification of development needs to improve staff performance. Staff indicate high levels of trust in the organisation and consider their employment terms, conditions and working environment to be fair. Concern's Code of Conduct and associated policies cover expected staff behaviours in many areas including with programme participants, funds and property. Concern's partner staff are not uniformly aware of the contents of their organisation's or Concern's Code of Conduct, or other policies relating to safeguarding.	
Commitment 9: Resources are managed and used responsibly for their intended purpose	Concern's grant and financial management systems, and procurement and logistics systems contribute to efficiencies, as does an organisational commitment to value for money. Partners and staff are clear on the <i>Anti- Fraud Policy</i> which guides staff on their responsibilities in prevention, deterrence, early detection and investigation. In cases where gross misconduct is found, Concern's guidance for staff is not always clear on the criteria for reporting criminal acts to the authorities. Quality, cost and timeliness are considered in both budgeting and procurement and the 2019 procurement manual also requires minimum environmental standards be considered in purchasing decisions. Concern's new environment policy and strategy reflect the organisation's position that climate-related disasters impact people's livelihoods, climate is becoming a driver of conflict, and both contribute to extreme poverty, particularly for women.	2.6

Summary of non-conformities

Corrective Action Requests CAR(s)	Type (minor/major)	Close-out due date	Close-out date
2017-3.6: Concern does not systematically identify all potential and unintended negative effects, particularly regarding safety, security, culture, social and political relationships, and the environment.	Minor	2019-10-10	2019-11-20



Total number of open CARs	As 4		
2017-9.4: Concern does not produce formal guidance on environmental impact assessments and generally does not formally consider the environmental impact of using local and natural resources.	Minor	2019-10-10	2019-11-20
2019- 5.6: Concern does not assure that communities are made fully aware of the expected behaviour of staff and partner staff, including commitments on the prevention of sexual exploitation and abuse.	Minor	2021-11-20	
2019-5.3: Concern's complaint response mechanisms do not provide for timely and appropriate complaints handling that prioritises the safety of the complainant and those affected at all stages.	Minor	2021-11-20	
2019-5.2: Concern does not ensure that the full scope of complaint response mechanisms is communicated to communities.	Minor	2021-11-20	
2017-5.1: Concern does not systematically consult communities on the design and implementation of complaints response mechanisms and there is limited evidence that it consults communities on the monitoring of complaints.	Minor	2019-10-10	2019-11-20
2019-4.1: Concern and partners do not systematically share information about the principles they adhere to and about expected behaviour of staff.	Minor	2021-11-20	
	Minor	2021-11-20	A.S.S.

Sampling recommendation for next audit

Sampling rate	Minimum of 3 samples, minimum of one visit
Specific recommendation for selection of sites	It is recommended that partner-based humanitarian programmes be included in the re-certification audit.
	Additionally, as the focus of the mid-term audit was Concern's work with partners, it will be important to interview communities involved in directly implemented programmes.



Acknowledgement of the report

SPACE RESERVED FOR THE ORGANISATION		
Reservations regarding the findings / remarks regarding the beha	aviour of the audit team: 🗌 yes 🗌 no	
Please give details:		
Acknowledgement and Acceptance of Findings:		
I acknowledge and understand the findings of the audit I accept the findings of the audit		
Name: Dominic Mac Sozley	Date and place: Diblin, Treland 3 febros 2020	
Signature:		

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

0	Major non-conformity or Major weakness
	Your organisation currently does not work towards applying this requirement, either formally or informally. It's a major weakness that prevents your organisation from meeting the overall commitment.
1	Minor non-conformity or Minor weakness
	Your organisation has made some efforts towards applying this requirement, but these efforts have not been systematic.
2	Observation
	Your organisation is making systematic efforts towards applying this requirement, but certain key points are still not addressed.
3	Conformity
	Your organisation conforms to this requirement, and organisational systems ensure that it is met throughout the organisation and over time – the requirement is fulfilled
4	Exceptional conformity
	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 organisational systems ensure high quality is maintained across the organisation and organisation and organisation and organisation and other time.