

Dan Church Aid Re-Certification Audit – Summary Report 2021/04/29

1. General information

1.1 Organisation

Туре	Mandates		Verified	
X International National Membership/Network Direct Assistance Federated With partners	X Humanitarian X Development X Advocacy		X Humanitarian X Development X Advocacy	
Head office location	Copenhagen, Denmark			
Total number of country programmes	18	861		

1.2 Audit team

Lead auditor	Karin Wierenga
Second auditor	Jordi Capdevila
Third auditor	
Observer	
Expert	
Witness / other	

1.3 Scope of the audit

CHS Verification Scheme	Certification
Audit cycle	Second audit cycle
Phase of the audit	Recertification audit
Extraordinary or other type of audit	

1.4 Sampling*

Randomly sampled country programme sites	Included in final sample	Replaced by	Rationale for sampling and selection of sites	Onsite or remote
Humanitarian food and livelihood improvement project Gambella, Ethiopia. Partner IGA, skills training, livelihoods projects Amhara Region, Ethiopia.	Ethiopia		Country programme with both development and humanitarian portfolios and with both implementation through local partners as self-implementation. Size of the programme, reflective of the work undertaken by the organisation.	Remote
Food security and resilience project, Gaza strip, and IGA project Bethlehem, Hebron, Palestine.	Palestine		Development projects, geographical diversity, portfolio of working with partners and not included in first cycle.	Remote
Education project and Shelter and Protection project, Kivu, DR Congo.	DRCongo		Humanitarian and self-implementing projects and not included in first cycle.	Remote

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Any other sampling performed for this audit:

Application of the recommendation from MA 2020: assessment DCA self-implementing humanitarian programme.

Sampling risk: Visits were not possible due to the ongoing COVID-19 pandemic. Interviews were conducted with country staff and partners, and with only two community groups. This limitation is highlighted in section 4.6. organisational performance against each commitment, when it comes to feedback from communities. DCA is at the beginning of its second 4-year audit cycle with HQAI. Over the first cycle, 2017-2021, DCA has worked steadily through each audit and has demonstrated improving performance over time.

*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
DCA country office Addis Ababa, Ethiopia	2021/01/25-2021/01/29	Remote
DCA field office Gambella, Ethiopia	2021/01/27, 2021/01/28	Remote
Partner offices, Addis Ababa, Ethiopia	2021/01/28, 2021/01/29, 2021/02/09	Remote
DCA country office Jerusalem, Palestine	2021/02/18	Remote
DCA field office Bukavu, DRCongo	2021/02/18	Remote

2.2 Interviews

Position / level of interviewees	Number of in	Number of interviewees	
	Female	Male	remote
Head Office			
Management	2	3	Remote
Staff	5	4	Remote
Country Programme Offices			
Management	3	3	Remote
Staff	6	5	Remote
Partner staff	2	4	Remote
Others			
Total number of interviewees	18	19	

2.3 Consultations with communities

Type of group and location	Number of participants		Onsite or
	Female	Male	remote
Self Help group women	6		Remote
Young men and women (IGA)	2	3	Remote

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Total number of participants	8	3	
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2.4 Opening meeting

Date	2020/11/09
Location	Copenhagen, Denmark (remote)
Number of participants	9
Any substantive issues arising	no

2.5 Closing meeting

Date	2021/03/05
Location	Copenhagen, Denmark (remote)
Number of participants	9
Any substantive issues arising	no

2.6 Programme site

Briefing

Date	2021/01/25
Location	Addis Ababa, Ethiopia (online)
Number of participants	6
Any substantive issues arising	No

De-briefing

Date	2021/02/10
Location	Addis Ababa, Ethiopia (online)
Number of participants	3
Any substantive issues arising	No

3. Background information on the organisation

3.1 General information

Dan Church Aid (DCA), founded in 1922, is an independent, non-profit, faith-based organisation rooted in the Danish National Evangelical Lutheran Church, based in Copenhagen, Denmark. DCA is a member of the ACT Alliance and cooperates with the Lutheran World Federation and the World Council of Churches.

DCA's purpose is to empower the world's poorest in their struggle for a dignified life. This effort is based on a Christian worldview and anthropology as well as respect for human rights and the equal worth of all human beings. DCA organises aid and assistance at local, national and global levels, in close cooperation with churches and other partners, and engages with people's movements and political powers to influence decision makers to improve conditions for the world's poorest.

DCA has a country office in 18 countries, mainly in Africa, but also in Asia and the Middle East. The revised International Strategy (2019-2022) forms an integrated part of the eight years (2015-2022) Global Strategy. DCA pursues three global goals:

- Save lives; strategic intervention areas include rapid humanitarian response and preparedness, emergency livelihoods and sustainable recovery, community safety and protection.
- Build resilient communities; strategic intervention areas include community-based disaster risk reduction and risk management, sustainable community livelihoods development and job creation, communities influence decisions for building resilient communities.

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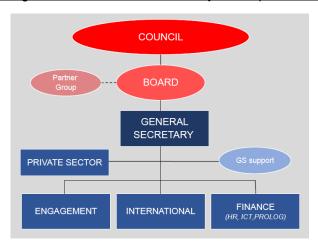
 Fight extreme inequality; strategic intervention areas include space for civil society and protection of human rights defenders, inclusive participation in decision-making, equitable distribution of resources through inclusive and accountable institutions, combating discrimination and promoting rights of excluded groups.

All international programmes and projects in DCA are developed and implemented within the priorities of the thematic policies: Active citizenship, Right to Food, Humanitarian Action and Safer Communities in which gender and rights-based approach are mainstreamed. DCA is funded by more than 60 different international donors in addition to funding from Danida as part of a Strategic Partnership Agreement (2018-2021), ECHO FPA strategic partnership as well as contributions from individuals and companies.

3.2 Governance and management structure

A Council with a maximum of 30 members representing stakeholders of the organisation governs DCA. The Council is the supreme governing body of the organisation with responsibility for DCA's vision, values and overall objectives and strategy. The Board has a maximum of 11 members (7 appointed by the Council, one elected by DCA staff and 3 coopted by the Board) and is responsible for the political management of the organisation in close cooperation with the operational Senior Management of DCA.

Organogram Board - General Secretary and departments



The international Department encompasses humanitarian and development work, with a common approach to strategy and quality management, and advocacy and learning. Decision-making authority is decentralised to the Country Directors, who are responsible for the country programme strategy and projects in line with the global DCA policies and strategies.

Organogram International Department



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3.3 Internal quality assurance mechanisms and risk management

DCA has internal quality assurance and control systems in place to address requirements of the CHS, and other strategic commitments. DCA has built its approach to quality management and accountability on its commitment to the CHS (DCA International Strategy 2019-2022). A systematic assessment of DCA's adherence to the CHS has been put in place by a mandatory Accountability Improvement Plan (AIP) that is congruent with the 38 CHS Key Actions for each Country Program (CP) to be completed in December each year. The purpose is to detect any gaps and weaknesses in the way DCA and partners work and to identify actions and steps to address them.

Accountability focal points have been appointed in each country office, providing support regarding DCA's efforts towards accountability, transparency and enhancing quality assurance throughout the organisation, including CHS standards. The Partner Assessment Tool (PAT), which is a pre-requisite for finalising Cooperation Agreements for funded activities, now includes more explicitly CHS commitments including PSEA, Code of Conduct and Complaints and Feedback mechanisms.

3.4 Work with partner organisations

Working with partners is a core principle for DCA and fundamental to its values and identity. DCA works with a total number of 195 local partners for project implementation (signed cooperation agreement) out of which 145 partners have long term partnerships.

As a signatory to Grand Bargain, DCA is committed to fund local and national partners directly, and systematically measure the multi-year investment to support partner capacity development. DCA uses a Partner Assessment Tool (PAT) to assess, monitor and document partner's organisational strengths and weaknesses, in order to strengthen partners' capacity building and organisational development.

DCA's partners include civil society organisations; churches; faith-based organisations; governments; academic institutions; political parties; international regional and global institutions; networks; and private sector actors.

4. Overall performance of the organisation

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

DCA management system has not changed since the last audit. The organisation continues to build its programmes on a common strategy following the same set of procedures and tools for humanitarian and development programmes across all country programmes, supported by digital platforms. Decision-making is decentralised to Country Directors, who are responsible for country programme implementation and the cooperation with implementing national POs. Quality assurance at CO level is done by monitoring and reporting, data management and analysis, quarterly review, annual programme review and reporting. Head office provides quality control and monitoring, technical support and capacity development, MEAL support and the annual planning and review cycle. External performance audit is done annually on sampled projects to check if all required and relevant steps from the Project and Programme Manual have been adhered to.

Risk management is part of planning and reporting cycle at different levels in the organisation. Country level risk matrices include operations, context (security/safety), corruption, financial management, legal/compliance, partnerships, human rights, programme sustainability, conflict sensitivity, women's rights, gender equality, environmental sustainability and climate.

4.2 How the organisation applies the CHS across its work

DCA continues to be committed to implement the CHS which is demonstrated at all levels throughout the organisation. The CHS is used as a tool to improve programme work, at the community level and with partners, made visible in the Country Annual Accountability Improvement plans that guide the country office in planning and reporting on progress towards all CHS indicators. DCA understanding of the local context and stakeholders is strong due to its local level partnerships and staff. DCA and its partners have a joint approach to working with communities based on dialogue, participation and feedback.

4.3 PSEA

DCA demonstrates an organisational culture where complaints are taken seriously and are acted upon according to defined policies and procedures throughout the organisation. DCA ensures that programmes take into consideration needs and risks, identify potential negative effects and work with partners to implement strategies and guidance in order to prevent sexual exploitation and abuse. Accountability focal points are in place on CO level to monitor

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(a.o.) PSEAH awareness and ensure training. The POs interviewe	ed in this audit have Codes
of Conduct and complaints handling systems in place but DCA do	es not always have a clear
understanding of how PO's complaints systems are functioning, for	or instance with regards to
sensitive complaints or referral of complaints. Specific information	n regarding expected staff
behaviour is not always shared with communities by DCA and PO	

4.4 Localisation

DCA implements its programmes to a large extent through partner organisations. In 2019, a total number of 242 cooperation agreements were signed between 195 partners and DCA. 145 out of 195 are long term partnerships. In 2019, DCA transferred 19% of total humanitarian funding directly to local and national partners while 33% of DCA's development funding was transferred to local and national partners. This represents a slight decrease since 2018 - the figures were respectively 20% and 34% (DCA International Report 2019). The cooperation with partners is based on clear agreements, outlining each other's roles and responsibilities. DCA is committed to build the capacities of its partners, support local leadership, and promote early recovery and resilience of communities and local stakeholders.

4.5 Gender and diversity

DCA ensures inclusive representation, participation and engagement of people and communities at all stages of the work. This is achieved by clear policies and followed-up by application of guidelines and procedures on impartiality, gender and diversity awareness.

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

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	DCA continues to perform well against the organisational responsibilities and key actions of this indicator. DCA is committed to provide impartial assistance based on needs, especially for those most marginalised in the communities where they work. DCA promotes local empowerment and resilience together with its implementing partners. Programme and project planning cycle identifies capacities, vulnerabilities and needs of partners and communities, using disaggregated data. Context and stakeholders' analysis are systematically performed. Targeting criteria and selection of participants are set jointly with community representatives and local government. DCA reviews periodically its project and programmes through monitoring visits, evaluative processes and annual critical reflection workshops together partners. Information resulting from these processes is used to adapt programme and projects as needed. Risks are considered during initial programme and project cycle, although not all project proposals have developed risk assessments.	Based on a limited sample: Interviews with communities in Ethiopia confirm that DCA and PO consult with them to develop project plans, and to identity capacities, vulnerabilities, and priorities. Communities confirm that they are also consulted on whether the activities are meeting their needs and whether additional or different interventions are required.	3
Commitment 2: Humanitarian response is effective and timely	DCA continues to ensure adequate organisational capacities as well as the necessary skills to use appropriate technical standards. Country Offices conduct annual partnership reviews, where partners' capacities are assessed, identifying actions for improvement and required support.	Based on a limited sample: Communities perceive in general activities as being delivered timely and with the right set of capacities and skills.	2,7

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DCA reviews periodically its project and programmes through monitoring visits, evaluative processes and annual critical reflection workshops, where constraints and safety aspects are discussed. Resulting findings are used to adapt programme and projects as needed.

DCA's has access to some flexible funding mechanisms which allow funds to be released quickly. Identified unmet needs are referred to those with adequate capacity.

Interviews with partners confirm that their capacity development needs are regularly assessed. However, not all partner assessments include detailed capacity building needs. Partners confirm their commitment to risk management, however, risks are not assessed nor monitored systematically, including risks to the communities.

Commitment 3:

Humanitarian response strengthens local capacities and avoids negative effects

DCA has policies and guidance to prevent programmes having any negative effects, such as, sexual exploitation, abuse or discrimination by staff. DCA promotes communities' empowerment and resilience, mapping local capacities and designing programs and projects to increase communities' capacities and resilience. DCA supports local structures to develop preparedness plans and collect and interpret early warning information, mainstreaming community-based Disaster Risk Reduction approaches. DCA program and project design cycle ensures that marginalised and disadvantaged groups are appropriately represented. Exit strategies are considered during project proposals and monitoring activities.

DCA is actively working to ensure that personal information collected from communities and people is safeguarded. A new data protection guide is being rolled out, and training on data protection is ongoing, but it has not been fully socialized yet across the entire organisation and partners. Identification of data processing activities at country office level has not been yet completed. A draft complaint protection policy is available, but it has not been rolled out.

DCA continues to work to ensure that potential and actual unintended negative effects are identified and acted upon in a timely and manner. Accountability systematic complaints handling focal points are being appointed at country office level. DCA country programmes identify potential risks. The organisation works together with its partners to ensure projects consider risks and mitigate potential unintended negative effects during the initial design phase. Nevertheless, not all project proposals have developed risk assessments. Revisiting project risk assessments, including mitigation measures to avoid adverse impact to communities, is not performed across all projects. In the event of Based on a limited sample: Interviews with communities in Ethiopia confirmed that DCA projects address their needs and capacities, increasing their resilience, and how activities benefiting the local economy. Communities confirmed as well that those who are disadvantaged marginalised are represented in their community and right holders committees, and how when negative effects are been identified, actions have been taken to remedy the situation. Communities are clear on how they can raise concerns or complaints to the organisation and partners.

2,6



	identified negative effects, DCA supports and follows up with partners on the mitigation measures adopted.		
Commitment 4: Humanitarian response is based on communication, participation and feedback	DCA's continues to be committed to transparent, accurate and timely information sharing. DCA is committed to ensure that rights holders and communities are consulted and engaged in the identification of their priorities and risks at all stages of its work. DCA Participation and Targeting Guidelines promote communication with rights holders and communities, which take place in the form of project initiation meetings, monitoring visits, post distribution assessments and annual review processes, informing and contributing to project and programme design and implementation. Feedback on right holders' level of satisfaction is also received through DCA and partner complaints mechanisms. Right holders are encouraged to identify their preferred feedback mechanisms. Information such as complaints mechanism, PSEA and abuse of power is contextualised to the local environment and usually translated into local languages to facilitate its dissemination across communities. DCA shares general aspects on PSEA with communities, however, information regarding DCA Code of Conduct and staff behaviour is not always shared with communities.	Based on a limited sample: Interviews with community members in Ethiopia confirmed that they feel well informed, including around organisational commitments on PSEA, staff behaviour and project details. Community members confirm as well that they feel the information provided to them is appropriate and is understood, and that they participate and engage with DCA during all phases of the project cycle management, where their feedback regarding their level of satisfaction is sought by DCA and PO.	2,8
Commitment 5: Complaints are welcomed and addressed	DCA has a strong organisational commitment towards accountability to affected populations and communities, which is reflected in its complaints' procedures and mechanisms throughout its programmes and projects, and as demonstrated by the establishment of the accountability and complaints handling focal points. DCA complaints handling system is available on its website. The Complaints Mechanism covers complaints about programming, sexual exploitation and abuse, and other abuses of power. DCA Country Offices and PO have developed country specific handling mechanisms which clearly communicate the scope and means to file complaints, including contextualised awareness raising materials. DCA manages complaints in a timely, fair and appropriate manner that prioritises the safety of the complainant and those affected at all stages. DCA regularly monitors its complaints handling processes. An annual complaints report is produced. Training on complaints handling is regularly provided to DCA staff and partners. DCA and its partners consult communities on the design, implementation, and monitoring of the complaints handling processes. DCA encourages and supports its implementing partners to have a complaints handling system in place. However, some long-standing partners have not developed their own complaints handling system and there is not sufficient	Based on a limited sample: Interviews with community members from Ethiopia confirm that they are aware of DCA's and partners commitment to PSEA and about expected staff behaviour, and that they feel safe to make complaints to or about the organisation and partners, without fear of any repercussions in doing so. Community members confirm as well that they had the opportunity to contribute to the design and implementation of the complaints management system and they are aware of how to access the complaint handling system.	2,1

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	understanding and visibility on how the partners		
	use theirs or DCA's complaints handling system.		
	DCA complaint handling systems, including those from implementing partners, do not provide specific guidance on referral of complaints falling outside DCA's or its partners' scope.		
Commitment 6: Humanitarian response is coordinated and complementary	DCA continues to perform well against the organisational responsibilities and the key actions of this commitment. No weaknesses were identified in previous audits and no significant changes have been made. There is a strong commitment at strategic level to cooperation and collaboration. DCA continues to work closely within the ACT Alliance and with other organisations at global, country and project levels. DCA is active in coordination forums such as cluster systems. DCA works in a collaborative manner with its partners and other actors to more effectively meet strategic goals, avoid duplication of effort and complement activities, thus reducing demands on communities. Procedures are in place to identify and analyse different stakeholders. There is strong partnership focus and due diligence process. Work with partners is governed by clear and consistent agreements and partners are supported to deliver the work.	Based on a limited sample: Interviews with community members from Ethiopia confirm that the PO is working in cooperation with local authorities and that there is no overlap with other organisations in the area.	3
Commitment 7: Humanitarian actors continuously learn and improve	DCA approach to continuously learn and improve is evident. DCA has monitoring guidelines, an evaluation policy and monitoring tools, such as a format that includes a section to record lessons learned. Proposals also capture experiences from previous projects. The new PPM as online Project Programme Management system gives guidance to the countries on the DCA's project management standards. This is much appreciated by the country office staff. Regular learning activities are implemented, community of practice, workshops, etc. The Accountability Improvement Plan is an annual cycle of learning and improvement on CHS. Learning is taken into account in the development of new projects. In the previous audit cycle, there were two observations, regarding learning from feedback and complaints, and learning not being systematically shared with communities. DCA learns in a systematic manner through regular monitoring, reporting, review and evaluation, which is shared internally and with partners. This includes learning from feedback and complaints. Organisational or programme learning is not, however, always shared with communities.	Based on a limited sample: Community members from Ethiopia interviewed state that they received information form the PO on how the projects were progressing, but not on progress or learning. The interviewees confirmed that they can provide feedback and suggestions to the PO through regular meetings.	2,6
	Evaluations are undertaken on project and programme level, but a management response is not systematically documented that describes		



	changes to be implemented. There are no recent DCA evaluations on the website.		
Commitment 8: Staff are supported to do their job effectively, and are treated fairly and equitably	DCA continues to perform well against the organisational responsibilities and key actions of this indicator. The HR systems, strategy and processes are in place throughout the organisation. Employee Development Review process is in place for all staff. DCA Code of Conduct and PSEA policy is well known and staff know how to report a complaint. However, not all country offices and partners have translated key information such as their Code of Conduct, PSEA Policy and Anticorruption Policy into local languages. DCA works with partners to assess and develop organisational capacity, including on staff CoC, however it does not include staff security.	Based on a limited sample: The communities from Ethiopia interviewed were generally appreciative of the expertise, behaviour and competence of partner staff that worked in their communities. They know what behaviour to expect of PO staff and how to raise concerns if needed.	2,7
Commitment 9: Resources are managed and used responsibly for their intended purpose	DCA continues to implement a robust financial and resource management system across the organisation and in its work through partners. Financial management and procurement procedures are in place and followed by staff at country programme level. DCA assesses partners on their financial capacity and monitor them closely through defined reporting mechanisms. DC is making efforts to improve how it assesses and minimises the impact of its work on the environment. However, this has not fully reached project level yet, as not all relevant DCA and partner projects assess risks and monitor impact on the environment.	Based on a limited sample: Community members from Ethiopia interviewed confirm that they consider the partners resource management to be appropriate, empowering participating community members to generate savings. Communities are made aware by DCA PO on environment related issues.	2,8

^{* &}lt;u>Note</u>: Average scores are a sum of the scores per commitment divided by the number of indicators in each commitment.

5. Summary of non-conformities

Corrective Action Requests (CAR)	Туре	Resolution due date	Date closed out
2021- 3.6: DCA does not consistently identify and monitor risks, including unintended negative effects, to act in a timely and systematic manner.	Minor	2023-03-10	
2021 - 5.4: DCA processes do not sufficiently ensure that all its partners have functioning complaints handling mechanisms in place.	Minor	2023-03-10	
2021 - 5.7: DCA has no formal referral mechanisms in place for complaints that do not fall within the scope of the organisation or its partners.	Minor	2023-03-10	
Total Number	3		

^{* &}lt;u>Note</u>: The CARs are completed by the audit team based on the findings. The audited partner is expected to respond with a Management Response for each CAR to HQAI before a certificate is issued (reference: HQAI Procedure 114).

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6. Sampling recommendation for next audit

Sampling rate	As outlined for Maintenance.
Specific recommendation for selection of sites	Include also a country programme for onsite visit where DCA implements advocacy programmes.

7. Lead auditor recommendation

In our opinion, DCA has demonstrated that it continues to Standard on Quality and Accountability.	conform	with the r	equirements of the Core Humanitariar	
We recommend maintenance of certification.				
Name and signature of lead auditor:			Date and place:	
Jalierenga			10-03-2021 Deventer, The Netherlands	
. HQAI decision				
			ficate reinstated ficate withdrawn	
Registration in the Independent Verification Schem	ne:			
☐ Maintained ☐ Reinstate ☐ Suspended ☐ Withdraw				
Next audit: Surveillance audit before YYYY/MM/DD				
Name and signature of HQAI Executive Director:			Date and place:	
Pierre Hauselmann				
. Acknowledgement of the repor	t by t	he org	janisation	

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Birgitte Qvist-Sørensen	11-05-2027 Copenhage	l en, Denmark
Name and signature of the organisation's representative:	Date and	place:
Tabbopt the initiality of the additi	☐ Yes	□ No
I accept the findings of the audit	☐ Yes	☐ No
Acknowledgement and Acceptance of Findings: I acknowledge and understand the findings of the audit		
If yes, please give details:		
Any reservations regarding the audit findings and/or any remarks regarding the behaviour of the HQAI audit team:	☐ Yes	□ No

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.

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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.	 Score 0: indicates a weakness that is so significant that the organisation is unable to meet the commitment. This leads to: 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.	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: • 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.	Score 2: indicates an issue that deserves attention but does not currently compromise the conformity with the requirement. This leads to: • 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.	Score 3: indicates full conformity with the requirement. This leads to: 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.	Score 4: indicates an exemplary performance in the application of the requirement.

^{*} Scoring Scale from the CHSA Verification Scheme 2020