hqai
HUMANITARIAN QUALITY
ASSURANCE INITIATIVE

Mid-Term Audit – Summary Report MTA 2020/08/24

1. General information

Organisation   TPO Uganda

Type	Mandates	Verified
☒ National ☐ Membership/Network ☐ Direct Assistance ☐ International ☐ Federated ☐ With partners	☒ Humanitarian ☒ Development ☐ Advocacy	☒ Humanitarian ☒ Development ☐ Advocacy
Head office location	Kampala, Uganda	
Total number of country programmes	1 (13 project sites)	**Total number of staff** 183 (average 2019)

Audit team

Lead auditor	Marie Grasmuck
Second auditor	-
Third auditor	-
Observer	-
Expert	-
Other	-

Scope of the audit

CHS Verification Scheme

Audit Stage	Certification	Independent Verification	Benchmarking	Other
Initial audit (IA)	☐	☐	☐	☐
First maintenance audit (MA1)	☐	☐	☐	☐
Mid-term audit (MTA)	☐	☒	☐	☐
Second maintenance audit (MA2)	☐	☐	☐	☐
Recertification audit (RA)	☐	☐	☐	☐
Extraordinary audit	☐	☐	☐	☐
Short notice	☐	☐	☐	☐
Other (specify)	☐	☐	☐	☐

Sampling

Randomly sampled project site	Included in final sample (Yes/No)	Replaced by	Rationale / Comments (If random sample not selected explain why and give rationale for the country programme selected)	Selected for onsite visit or remote assessment
#6: Provision of integrated Physical and Psychological Rehabilitation Assistance to War Victims in Northern Uganda (Trust Fund for Victims TFV)	Yes	NA	The project is mid-size and not in the same region as the other selected projects. Focuses on specialised mental health.	Remote
#10: Sustainable outcomes for children and youth in Central and South western Uganda (SOCY)	Yes	NA	The largest project of TPO, includes several partners and offers a different geographic coverage. Focuses on child protection and includes economic support activities	Remote
#13: Enhanced access to and uptake of sexual and	Yes	NA	The project is small and offers geographic spread. Focuses on both	Remote

reproductive Health and Rights for girls, boys and youth in Uganda. (REPSSI)		.	MHPSS and protection.	.	.

Other sampling performed for this audit:

Purposive sampling was used to select the community members for interviews. TPO proposed an initial list of community members that were available for the interviews, willing to speak with the auditor, and reachable by phone. The auditor then reviewed the list and asked for some community members to be replaced by other type of stakeholders in TPO's project (individual beneficiaries of TPO's assistance rather than trained health center staff for instance) or by female respondents in order to ensure gender balance.

Out of the 8 local CSO that are partner of the SOCY project, 3 were randomly sampled for interviews.

Despite the limitations inherent to the exclusive use of remote auditing methodologies for the present process, we believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusions and recommendation.

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

Locations assessed

Locations *(offices, projects at country programme level)*	Dates	Onsite or remote
Kampala – Head office - staff	7, 8 and 9 July 2020	Remote
Mityana – sub-office – staff (SOCY)	7, 8 and 9 July 2020	
Rakai – sub-office – staff (SOCY)	7, 8 and 9 July 2020	
Mbarara – sub-office – staff (SOCY)	7, 8 and 9 July 2020	
Kiryadongo – sub-office – staff (REPSSI)	7, 8 and 9 July 2020	
Gulu – sub-office – staff (TFV)	7, 8 and 9 July 2020	
Bushenyi, Mityana, Kabale - communities (SOCY)	16 and 17 July 2020	
Kiryadongo - communities (REPSSI)	16 and 17 July 2020	
Gulu - communities (TFV)	16 and 17 July 2020	
Kampala - partners (all projects)	16 and 17 July 2020	

Interviews

Position / level of interviewees *(add information as necessary)*	Number of interviewees (male/female)	Onsite or remote
Head Office		
Management	11 (5/6)	Remote
Staff	1 (0/1)	
Country Programme(s)		
Management	3 (3/0)	Remote
Staff	6 (3/3)	
Partner staff	5 (3/2)	
Others (specify)		

Total number of interviews	26 (14/12)	

Consultations with communities

In total, 17 individual interviews were planned. Out of those, 3 interviewees did not answer the phone, and 14 were interviewed. The phone connection was good, except for two interviews, where the questions had to be repeated several times before they went through, thus limiting the number of questions that could be asked. The auditor asked specific questions to test that the process was free of biais, with specific attention given to the language used by interviewees. The auditor confirms that the interviews provided sound evidence of TPO's application of the CHS.

Type of group	Number of participants	
	Female	Male
Individual interview – local structure (SOCY)	0	1
Individual interview – local government (SOCY)	1	0
Individual interview – community member (SOCY)	0	1
Individual interview – local structure (SOCY)	0	1
Individual interview – local government (SOCY)	1	0
Individual interview – community member (SOCY)	1	0
Individual interview – community support structure (TFV)	0	1
Individual interview – health centre (TFV)	0	1
Individual interview – community member (TFV)	1	0
Individual interview – community member (TFV)	0	1
Individual interview – community member (TFV)	1	0
Individual interview – health centre trainee (REPSSI)	0	1
Individual interview – health centre trainee (REPSSI)	1	0
Total number of participants	6	7

Opening meeting

Date	2020-07-07
Location	Remote
Number of participants	15
Any substantive issues arising	No

Closing meeting

Date	(2020-07-24)
Location	Remote
Number of participants	13
Any substantive issues arising	No

3. Background information on the organisation

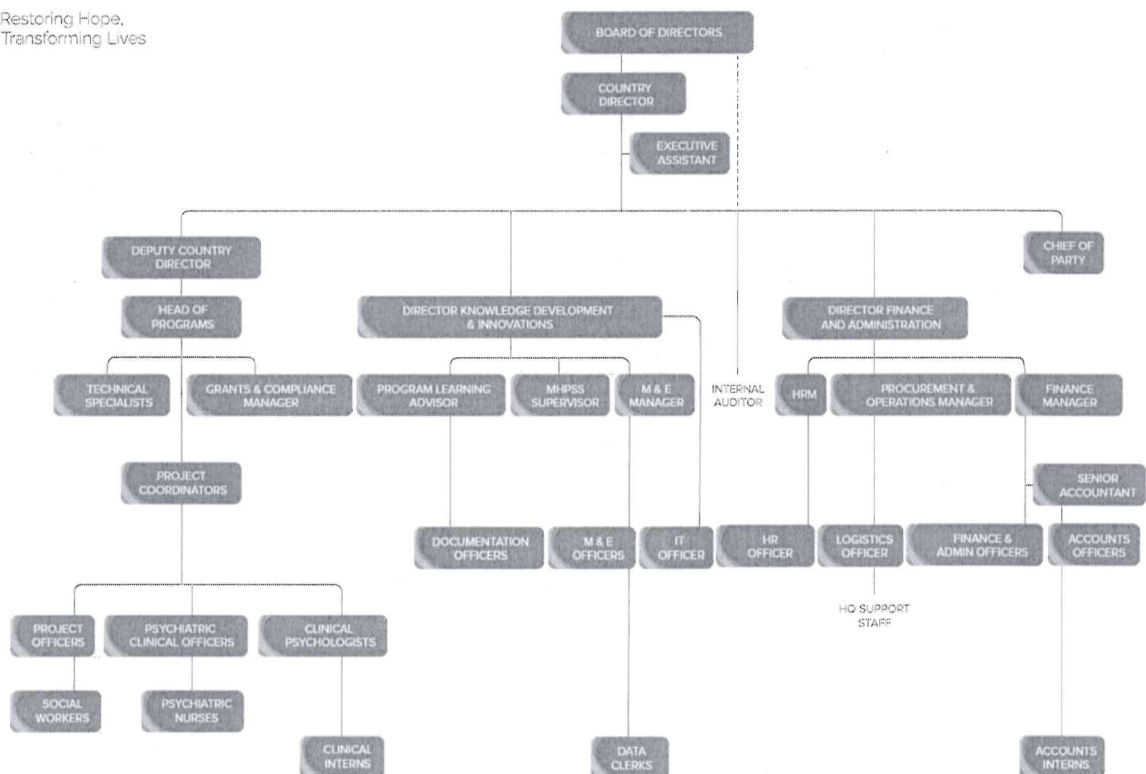| Governance and management structure	TPO Uganda is a rights-based NGO that works in partnership with communities, civil society, the private sector and government to empower communities improve their mental health and socio-economic wellbeing in a sustainable way (as per its mission statement). It registered in 1994 in Kampala, Uganda.

In 2019, TPO was active in 36 districts, its budget amounted to 4 300 000+ USD, and it had 180+ staff.

TPO Uganda has a Board of Directors that comprises nine members, including the Country Director as the Secretary. Service on the board is voluntary and the selection method used is through public invitations to serve. The Board is organized into 3 committees; Audit and Risk Management, Governance and Organisational Development and the Programmes and Resource Mobilization Committees.

The day to day management of TPO is done by the Country Director supported by a Deputy Country Director, a Director of Finance and a Director of Knowledge Development and Innovations. This changed since the last audit, when TPO mostly had Managers (rather than Directors positions), with smaller teams. In the last two years, TPO engaged in restructuring its teams in order to be in the capacity to deliver quality projects in the face or the financial and operational growth of the last years (+30% total budget in 3 years).

The board performs monitoring visits in the field several times a year.

Effectiveness of the internal quality assurance systems	TPO has a quality assurance system based on participative policy building, activities design and implementation, as well as monitoring processes. Policy building is done through learning from experience, taking into account international, national or internal standards. The implementation of the policy or guideline is ensured through training and awareness raising at all levels of the organisation. For instance, sectoral experts organize monitoring visits and build awareness on core issues and standards, while the field staff is expected to raise the awareness of its counterpart at partners' level and of the community. The community and the

local government are also involved at all stages and sensitised on core issues. The Directors, Board Members and Managers regularly organize field visits, where they organized leaders and community meetings and repeat key messages to the community.

The same modus operandi is used to gather feedback or implement a new tool. Feedback from the field and from monitoring visits are formalised into reports so recommendations or issues can be followed through time. Regular, large scale monitoring and evaluation activities are organized for the projects, as well as action-research, which all complete the quality assurance system of TPO.

Work with partner organisations	TPO works with partner organisations and has different types of partnerships: operational partnerships (local organisations benefitting from TPO's activities such as capacity reinforcement or organisations member of a consortium with TPO) and sub-grantees.
	While TPO had community partnerships at the time of the Mid-Term Audit (MTA – 2020), it did not have any subgrantee, nor did it have any in 2019. However, TPO is currently developing a budget of which 40% is to be allocated to a subgrantee. Considering this and the lack of recent evidence and projects with sub-grantees, the auditor did not consider sub-grantee type of partnership in the MTA. (see recommendations for future audit's sampling below).

4. Overall performance of the organisation

Effectiveness of the management system and internal quality assurance and governance	As noted above, TPO has restructured its management teams and staff in order to provide a stronger quality assurance for its activities in general. TPO's focal point regarding the IA's action plan is the Deputy Country Director, closely supported by the Monitoring and Evaluation Manager; however, the whole structure (Boards, Directors, Managers, Field Staff) is aware of the verification cycle TPO is involved in, and has contributed to the implementation if the action plan. Bridging from verification to certification remains a strategic goal of TPO, and the senior management actively involves the different stakeholders in complying with the standard.
	The initial audit had issued Weaknesses regarding the awareness of the communities on the principles TPO adhered to, and on its complaint handling mechanism. The strategy of TPO has been to strengthen how it ensures the awareness of its staff and encourage them to take responsibility into implementing those principles, including by informing the communities. For instance, managers are in charge of reminding their team at the start of every meeting, and often prompts individual staff on what those principles means for them. The staff then have the responsibility to raise awareness of the communities and the partners at each of their encounter. This strategy has proven effective in resolving the Weaknesses.
	The initial audit had noted that TPO's risk management process wasn't documented, and that it couldn't ensure a consistent and ongoing risk analysis in its area of intervention. Since then, TPO developed a Risk Management Strategy, that lays how every field location should approach and analyse risks. However, field locations haven't performed their risk assessment at the moment of writing this report, and the policy is no fully in place yet.
	TPO's position and processes regarding the management of its environmental impact remains to be formalized and consistently put into practice.

TPO's management system and board governance has proven to be effective when operating during a crisis such as the Covid-19 pandemic, resulting in no unnecessary delays and additional MHPSS activities being deployed before institutional funding could be secured.

Organisational performance in the application of the CHS	TPO's performance has significantly improved in the areas of weaknesses identified at the IA: Information of the staff and the communities on the Code of Conduct and the principles TPO adheres to (commitments 4 and 8), and on its overall management of the complaint mechanism (commitment 5, Major Weaknesses 2018 - 5.1, 2018 - 5.6, Minor Weaknesses 2018 - 5.3, 2018 - 5.6 have been closed). TPO's performance has improved in the area of context analysis (commitment 1), effectiveness and timeliness of humanitarian response (commitment 2), participation and resilience of the communities (commitment 3), and human resources (commitment 8). However, while some initiatives have been taken, several observations have been noted regarding risk management (part of commitments 3 and 9). Also, two observations and two Minor Weaknesses have been raised regarding how TPO assess and mitigates its environmental impact (Minor Weakness 2018 – 9.4 and Minor Weakness 2018 – 9.6) Overall, the performance has improved: - 2 Major Weaknesses have been closed - 8 Minor Weaknesses have been closed - 1 Minor Weakness has been extended - 3 new Minor Weaknesses have been opened - 12 observations are no longer relevant - 6 new observations have been noted.
Performance on PSEA	Score 2.2 – TPO has several systems in place to respect its commitments towards PSEA, such as functional complaint and whistle blowing mechanisms, local community networks, monitoring visits, spot-checks and mental health support for victims. TPO has also set up a support helpline following the Covid-19 outbreak, which acts as a referral platform in case of gender-based violence. TPO's staff are aware of the commitments of TPO regarding PSEA and trust that TPO would handle the complaints safely and follow its commitment to do so. Communities interviewed explained that they knew about TPO's commitments and the expected behaviour of its staff, and that they could complain or seek support in case of SEA.
Performance on localisation	Score 2.7 – TPO is a national organisation, which strategy is to base its activities on Community Support structures (CSS - see below), local systems reinforcement, and advocacy at all levels. TPO designs its projects to this aim, and partners with local organisations and local governments on the basis of capacity gap assessments and action plans that are collaboratively discussed. TPO organizes trainings at field and national levels, which materials are now in use by other actors.
Performance on gender and diversity	Score 2.9 – TPO takes gender and diversity into account at different stages of the project cycle, through organisational commitments, and in the operational activities. TPO organizes its activities through Community Support Structure (CSS), which are constituted of families and local networks. CSS aim at identifying vulnerabilities,

including the ones related to gender, disability, exclusion, etc., and to provide support to identified vulnerable persons. TPO communicates in languages and media appropriate to the context and implements several feedback gathering activities. Communities interviewed explained that TPO includes in its activities individuals from different groups of the communities, such as men and women, youth, people with disabilities, people with little socialisation etc.

Organisational performance in the application of the CHS

Commitment	Strong points and areas for improvement	Feedback from communities	Average score
Commitment 1: Humanitarian assistance is appropriate and relevant	TPO policies commit to impartial assistance and to taking into account the diversity of communities. TPO has several processes in place to ensure an ongoing analysis of the context, such as local community networks, relationships with the local government and other partners, and field visits. The project design stage takes into account the constraints of the communities and of the context, and TPO adapts its programmes when needed. For instance, during the Covid-19 pandemic, TPO used its radio broadcast activities to disseminate health awareness messages, and set up an emergency MHPSS helpline while securing the funds to ensure that it could keep on operating it.	Communities interviewed view TPO as an impartial actor and explained that vulnerability criteria are discussed with them and used in targeting. Communities confirmed that the project design is appropriate, although they would like for TPO to have more funding in order to provide a greater coverage of the community members with their assistance. Communities could recall sometimes where TPO adapted its project to fit a context change.	3.2
Commitment 2: Humanitarian response is effective and timely	TPO commit to implementing monitoring and evaluation activities, gathering evidence from its activities to adapt its projects, and delivering timely assistance. TPO designs projects that are safe for the communities, although risk assessments are not formalised for all contexts of activities. TPO's commitment to deliver timely assistance has been exemplified during the Covid-19 pandemic; TPO requested clearances for its staff to travel to some areas, it installed a mental health support and referral helpline in several districts of the country. TPO's staff use relevant technical standards in their work.	Communities interviewed explained that the activities encountered only minor delays due to the Covid-19 pandemic, and that they felt safe in participating in TPO's activities. Some community members could recall that TPO facilitated external referrals for other community members or themselves.	3
Commitment 3: Humanitarian response	TPO policies commit to preventing any negative effects and strengthening capacities. TPO's strategy is to build local	Communities interviewed felt better prepared to respond to the next crisis, or to be more	2.6

strengthens local capacities and avoids negative effects	capacity and organize local support structures and reinforcement local and national systems in its core areas of work. TPO develops organisational capacity assessments and action plans collaboratively with its local partners. The partners interviewed were satisfied with their partnership with TPO and considered that the resilience of the community and their capacity as first responders had been improved. TPO has systems in place to safeguard personal information collected from communities, and staff is aware of these. TPO has systems in place to identify unintended negative effects of its projects regarding people's safety, dignity and rights, sexual exploitation and abuse by staff, culture, gender, and social and political relationships and livelihoods. However, there is no system in place to identify unintended negative effects in the areas of economy during early recovery nor on the environment.	independent as a whole, although their main challenge was the need for funding. Communities interviewed who had benefitted from mental health activities felt more resilient and joyful after TPO's intervention.	
Commitment 4: Humanitarian response is based on communication, participation and feedback	TPO has policies that commit to information-sharing with the communities, to engage communities in giving feedback. However, TPO doesn't have guidelines on how external communications should present the communities. TPO's has several activities to engage the communities in feedback gathering such as project delivery activities, field visits, monitoring, evaluation and research action, as well a complaint mechanism. TPO has engaged in awareness activities regarding its mandate, the principle it adheres to and how it expects its staff to behave.	Communities interviewed could explain about TPO, its values, the expected behaviour of the staff, and its projects. They could recall several instances when they had been asked for feedback and feel that this feedback receives a response. Communities confirmed being asked for consent when taking a picture and that the communication they have seen represents the communities as dignified human beings.	2.9
Commitment 5: Complaints are welcomed and addressed	TPO has a complaint mechanism that is functional in practice; however, the documentation on it is very limited and lack important guidelines, for instance on complaint recording. TPO doesn't consistently consult the communities on the design of the compliant handling mechanism.	Communities interviewed were knowledgeable about the complaints handling mechanism and the expected behaviour of staff. Although it was not always the same process as described by TPO's staff, all community members	2

	TPO's organisational culture encourages complaints to be raised and staff was knowledgeable on how to receive and address complaints. TPO refers complaints that do not fall within its scope of operations. It is noteworthy that two Major Weaknesses, two Minor Weaknesses and two observations were closed under this commitment.	interviewed could refer to a method they trusted. Communities interviewed explained that in case they had a serious complaint, they would feel safe raising it to TPO.	
Commitment 6: Humanitarian response is coordinated and complementary	TPO is committed to coordination, collaboration and transparent partnerships, as stated in the strategic plan and confirmed by local and national partners. TPO has several processes in place to identify roles, responsibilities, capacities and interests of the different stakeholders, among which its participation to or leading of sectoral working groups and initiatives such as the Violence Against Children early warning mechanisms, or the mental health support and referral Covid-19 helpline.	Communities interviewed stated that TPO had relationships with other actors in the area they lived in, that there was no duplication of assistance, and that TPO usually advocated for gaps to be filled.	3
Commitment 7: Humanitarian actors continuously learn and improve	TPO is committed to learning and evaluation and has a learning strategy. TPO also continuously engages in research action with external partners, universities or health centres. The results of these are used to adapt projects and share with the humanitarian and specialised community. Lessons learned are formalised into monthly activity reports and lessons learned papers, and inform project design.	Communities interviewed recalled participating to evaluation and learning activities but did not recall receiving any feedback on the results of these activities.	2.8
Commitment 8: Staff are supported to do their job effectively, and are treated fairly and equitably	TPO has several human resources related policies, such as the HR training plan or the HIV/AIDS workers policy, that are compliant with the local law and seen as impartial by the staff. TPO engages in training and mentoring its staff and to providing external training. While TPO doesn't pay for higher studies' tuition, it encourages its staff to complete their studies and support them with flexible work hours if needed. Job descriptions and performance evaluations are in place. The staff knows the Code of Conduct, mission, vision and values of TPO as well as the consequences of not	Communities interviewed felt that TPO's staff treated them with respect and dignity, and that they are qualified to deliver projects' activities.	2.8

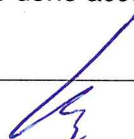|			
	adhering to them. Staff interviewed were happy with TPO as an employer and of how they've improved their personal and professional skills by working with the organisation.		
Commitment 9: Resources are managed and used responsibly for their intended purpose	TPO has policies to manage its resources, including how it prevents and address fraud and corruption, accepts gifts-in-kind, conducts audits and verifies compliance. However, it has no specific policy regarding how it uses its resources in an environmentally friendly way. TPO's Financial Management Policy commits to an internal audit capacity and annual external audits; however, this year's audit is still at draft stage. As it came late to the auditor's attention, reasons for the delay couldn't be investigated. TPO has processes to ensure the efficient use of resources such as financial and narrative monthly project reporting or monitoring expenditures against budget. TPO analyses its environmental impact in some but not all project proposals. It has no system in place to ensure the environmental aspect is taken into account in monitoring and evaluation activities.	Communities interviewed explained that TPO had the means to deliver its projects, although they would have preferred more coverage. They were knowledgeable that fraud and corruption can be reported through TPO's complaint mechanism and trusted that TPO would investigate such complaints.	2.2

5. Summary of non-conformities

Corrective Action Requests (CAR) / Weaknesses (YYYY – indicator)	Type (minor / major)	Resolution due date (YYYY/MM/DD)	Date closed out (YYYY/MM/DD)
2018-3.2. TPO has no formal processes to identify and analyse at an early stage existing preparedness plans or risk assessment.	Minor	2020/08/29	2020/08/24
2018- 3.6 No specific mechanism exists for prompt detection, assessment and mitigation of unintended negative effects, nor is there a systematic monitoring of unintended negative effects.	Minor	2020/08/29	2020/08/24
2018- 4.1 TPO does not systematically provide information to communities on the expected	Minor	2020/08/29	2020/08/24

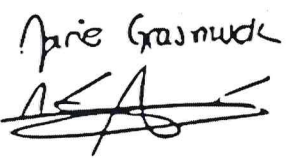|			
behaviour of its staff and on the principles it adheres to.			
2018- 5.1 Communities and people affected by crisis are not systematically consulted on the design, the implementation and the monitoring of complaints handling processes.	Major	2019/08/29	2020/08/24
2020- 5.1 Communities and people affected by crisis are not systematically consulted on the design, the implementation and the monitoring of complaints handling processes.	Minor	2022/08/29	
2018- 5.3 TPO does not take steps to guarantee the safety of the complainant and those affected at all stages.	Minor	2020/08/29	2020/08/24
2018- 5.4 The complaint handling process does not cover programming, sexual exploitation and abuse of people, or other abuses of power.	Minor	2020/08/29	2020/08/24
2018 – 5.4: The complaints handling is not documented.	Minor	2022/08/29	
2018- 5.6 TPO does not systematically provide information to communities on the expected behaviours of its staff	Major	2019/08/29	2020/08/24
2018- 7.1 Programmes are not systematically designed based on prior lessons and experience.	Minor	2020/08/29	2020/08/24
2018- 8.1 TPO staff is not consistently aware of behaviour policies, values of the organisation and minimum service standards.	Minor	2020/08/29	2020/08/24
2018- 8.9 TPO has neither a security policy nor context-specific guidelines in all locations of operation.	Minor	2020/08/29	2020/08/24
2018- 9.4 TPO's involvement in environmental protection is limited and potential negative impacts on the local and natural resources are not monitored. Environmental constraints and potential negative effects of the programs are not analysed in regards to water, soil, air and biodiversity.	Minor	2022/08/29	
2020- 9.4: Minor Weakness 2020 – 9.6: Policies and processes to ensure that TPO uses its resources in an environmentally friendly and responsible way are not in place yet.	Minor	2022/08/29	

6. Sampling recommendation for next audit

Sampling rate	The sampling rate can be done according to the usual methodology.

Specific recommendation for selection of sites	It is recommended to avoid USAID-funded projects, which already received scrutiny. It is recommended to include projects with sub-grantees since TPO sometimes operates through these. As the auditor did not consider sub-grantee type of partnerships in the MTA, it is recommended to review this aspect at the next Audit (A – 2022).

7. Lead auditor recommendation

In our opinion, TPO shows a high level of commitment to the Core Humanitarian Standard on Quality. We recommend maintenance in the Independent Verification scheme.

Marie Grasmuck (signature)	Date and place: August 24th, 2020 in Metz (France)
Marie Grasmuck, Lead Auditor, HQAI	

8. HQAI decision

Registration in the verification scheme:			
☒	Maintained	☐	Suspended
☐	Reinstated	☐	Withdrawn

Next audit: type of audit Re-verification before 2022/08/28

Pierre Hauselmann, Executive Director, Humanitarian Quality Assurance Initiative	Date and place: 20th October 2020, Geneva

9. Acknowledgement of the report by the organisation

Space reserved for the organisation

Reservations regarding the findings / remarks regarding the behaviour of the audit team:	☐ yes ☐ no

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HUMANITARIAN QUALITY
ASSURANCE INITIATIVE

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 organisation representative: PATRICK SAMBAGA COUNTRY DIRECTOR	Date and place: 24/11/2020

Country Director
TPO Uganda
P. O. Box 21646
Kampala

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 over time.