

# HAP Guide to Certification

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## **Acronyms**

ACAs – Agreed Corrective Actions

BM – Benchmark

CAR – Corrective Action Requests

CARB – Certification and Accreditation Review Board

HAP – Humanitarian Accountability Partnership International

MTPA – Mid-term Progress Audit

QN – Qualifying Norm



## ABOUT THIS MANUAL

This manual is for organisations interested in HAP certification, presenting key information about the HAP certification process. It covers: issues of management and who makes decisions on certification; the key components of certification and how they link to each other; and the six main phases in the process, with related steps that are followed from the moment that an organisation applies for certification and until the certificate expires. The manual also provides highlights of the roles played by HAP's Regulatory Services Team, the applying organisation and auditors.

*This manual will be revised and updated by HAP in order to reflect learning and improve the certification experience for all. Feedback and suggestions are welcome and can be sent by emailing HAP's Regulatory Services Director or the HAP Secretariat at [secretariat@hapinternational.org](mailto:secretariat@hapinternational.org) .*

## BACKGROUND

### HAP International

Established in 2003, the Humanitarian Accountability Partnership – International (HAP) is an international self-regulatory body working to improve the accountability of humanitarian action to people affected by crises. HAP's vision is a humanitarian sector with a trusted and widely accepted accountability framework which is transparent and accessible to all relevant parties. Its purpose is to achieve and promote the highest principles of accountability through self-regulation by members, linked by common respect to the rights and dignity of people the organisation aims to assist.

HAP is a multi-agency initiative with a growing membership of humanitarian, development and advocacy organisations from all parts of the world. Organisations that become members of HAP are committed to improving the quality and accountability of their work, developing better processes and systems to assure quality, and building a culture of learning and continuous improvement.

Formally, members of HAP commit to:

- Implementing the HAP 2010 Standard in Accountability and Quality Management;
- Preparing an accountability framework and code of conduct that prohibits sexual exploitation and abuse by staff;
- Reporting annually to HAP on the implementation of the framework and the code of conduct;
- And to monitoring of compliance.

To this end, HAP is mandated by its members to research and set standards of humanitarian accountability and quality management and to verify their compliance through HAP's certification scheme. HAP is also mandated to investigate complaints of non-compliance with the Principles of Accountability made against member agencies.

More information about HAP is available on its website: [www.hapinternational.org](http://www.hapinternational.org)

The list of HAP members is available here: <http://www.hapinternational.org/members.aspx>

### Accountability

Accountability has many meanings. Traditionally, it was understood as the way in which those who authorised others to act on their behalf made sure that authority was being used as agreed. Accountability is now more often understood to *also* be a right of anyone affected by the use of authority. This recent meaning of accountability is the foundation for HAP's work. For HAP and its members, *accountability is the means through which power is used responsibly*. It is a process of taking into account the views of, and being held accountable by, different stakeholders, and primarily the people affected by authority or power.

Accountability is particularly necessary for agencies that assist or act on behalf of people affected by or prone to disasters, conflict, poverty or other crises. Such agencies exercise significant power in their work to save lives and reduce suffering. In contrast, crisis-affected people have no formal control, and often little influence, over these agencies. As a result, it is difficult for those people to hold agencies to account for actions taken on their behalf.

Being accountable to crisis-affected people helps agencies to develop quality programmes that meet those people's needs, and reduces the possibility of mistakes, abuse and corruption. Accountability processes that are managed effectively make the organisations perform better. In this context, the HAP Standard helps organisations to assess, improve and recognise the quality and accountability of their work, and benefits both the organisations and the people affected by crises.

## The HAP Standard and Certification

In order to provide an objective, consistent and logical approach to verifying that HAP members apply and meet the *Principles of Accountability*, HAP developed the *2007 Standard in Humanitarian Accountability and Quality Management*. This was the first international standard designed to assess, improve and recognise the accountability and quality of humanitarian programmes.

The HAP 2007 Standard was developed through extensive consultation with representatives of the humanitarian sector including staff, donors, partners and people the organisation aims to assist. The benchmarks and requirements of the Standard reflect what people the organisation aims to assist, aid workers and other stakeholders agreed were the most important practices for assuring the quality of humanitarian action. *The ISO/IEC Directives Part 2, Rules for the Structure and Drafting of International Standards* (fifth edition, 2004) guided the drafting of the Standard.

Through an independent verification process, HAP now certifies agencies (both members and non-members) that are in compliance with the HAP Standard, providing assurance to aid people the organisation aims to assist, affected communities, staff, volunteers, host authorities and donors that the organisation is meeting its accountability and quality commitments.

To be certified, agencies must demonstrate compliance with the HAP Standard requirements. The HAP Standard also sets out the means of verification that auditors use to verify compliance.

### **The 2007 Standard is structured as follows:**

- HAP Principles of Accountability (what HAP Members sign up to)
- Four Qualifying Norms (agencies seeking to be certified must meet these)
- Humanitarian Accountability Covenant
  - Principles for humanitarian action
  - Declaration of additional interests
  - Working with humanitarian partners
- The HAP Benchmarks, which cover:
  - The accountability framework and quality management system
  - Information sharing
  - Participation

- Staff competencies
- Complaint handling
- Continual improvement

**The 2010 Standard** was approved in October 2010 following a major review involving consultation with member agencies, people and communities they assist, donors and other agencies with an interest in improving the quality and accountability of humanitarian action.

The HAP Standard was originally developed for application in humanitarian relief programmes. Based on experience and on the review consultations, the scope of the 2010 edition has been expanded and the HAP Standard can also be applied to other aspects of an organisation's work, including development and advocacy.

Overall, the 2010 edition gives further detail of requirements in the 2007 edition. Elements of financial accountability and prevention of sexual exploitation and abuse have been strengthened to reflect feedback from the review consultations and to promote coherence with other accountability systems. A separate section for agencies working with partners has been included under each benchmark.

The 2010 Standard is structured as follows:

- HAP Standard Principles
- Qualifying norms for certification
- The HAP Benchmarks, which are:
  - Accountability commitments and their management
  - Staff competencies
  - Information dissemination
  - Participation
  - Complaints handling
  - Monitoring, evaluation and learning.

Following a transition period, the 2010 edition replaces the 2007 edition.

To download either edition of the *HAP Standard* and *The Guide to the Standard*, visit the HAP website.

## HAP Services

HAP provides a range of capacity building and organisation development services to members and other agencies that seek to improve accountability to people the organisation aims to assist.

The following services are specifically designed for agencies that are interested in meeting the HAP Standard and becoming certified.

- Designing an Accountability Framework
- HAP Standard Baseline Analysis

- Complaints and Response Systems Workshop

The full list of HAP Services is available here: <http://www.hapinternational.org/projects.aspx>

## Working Collaboratively

Since the late 1990s the humanitarian community has initiated a number of inter-agency initiatives to improve accountability, quality and performance in humanitarian action. Representatives of ALNAP, HAP International, People In Aid and the Sphere Project began meeting on a regular basis in 2003 in order to share common issues and harmonise activities where possible; since 2006 these four have been joined by Coordination SUD, Groupe URD, the Emergency Capacity Building Project and the Listening Project.

While the different quality and accountability initiatives have different constituencies and use different approaches in their work, they complement each other in many ways. HAP distinguishes itself as a formal partnership of member agencies with a common commitment to set standards on quality and accountability and to monitor compliance with these standards through an external verification system.

For more information on other quality and accountability initiatives, please see <http://www.hapinternational.org/other/links/quality.aspx>

## THE HAP CERTIFICATION SCHEME

The HAP certification scheme is an independent process that verifies and recognises agencies that meet the HAP Standard. HAP, or a body accredited by HAP for this purpose, carries out the audit.

The HAP certificate and use of the HAP quality mark are granted for three years, subject to a compulsory mid-term progress audit or mid-term progress report.

### Management and Governance

#### **HAP's Regulatory Services Team**

HAP's Regulatory Services team:

- monitors HAP members' implementation of their accountability work plans;
- processes applications for HAP membership;
- manages the HAP complaints handling function, including investigations by HAP's pool of investigators;
- manages the HAP certification scheme, including the registered HAP auditors; and
- provides secretarial support to the Certification and Accreditation Review Board (CARB).

In addition, the Regulatory Services team is currently developing an accreditation process with HAP as the certifying body to ensure sustainability of the HAP quality assurance certification process.

The list of Regulatory Services staff is available here:

<http://www.hapinternational.org/about/secretariat/current-staff.aspx>.

#### **HAP Auditors**

Registered independent HAP auditors carry out the actual audits. HAP auditors prepare audit reports and make recommendations on certification to the Certification, Accreditation and Review Board.

Employed as independent consultants, the auditors are rigorously trained and pass a competence test prior to being granted a place on the list of registered HAP auditors. To maintain registered status, auditors conduct a minimum of two audits per year, complete a performance management review after each audit, comply with the HAP Code of Conduct and the HAP Auditors Code of Conduct and demonstrate active understanding of the HAP Standard and the quality assurance certification process.

The list of registered HAP auditors is available here:

<http://www.hapinternational.org/projects/certification/certified-agency-register.aspx>

## **Certification and Accreditation Review Board (CARB)**

The HAP General Assembly has final authority over the certification process and delegates responsibility for awarding certificates to the CARB.

The CARB is comprised of four independent members and two representatives of HAP Full Member agencies and one representative of a certified organisation elected by the HAP General Assembly. This structure was designed to ensure that certification process is managed fairly, consistently and robustly. The CARB makes decisions on awarding HAP certificates based on the auditor's report, which includes the auditor's recommendation on certification.

The CARB is also responsible for accrediting qualified bodies to conduct HAP certification services.

The list of CARB members and their terms of reference is available here:

<http://www.hapinternational.org/about/governance/carb.aspx>

## **Complaints-handling**

If an organisation is dissatisfied with the audit process or the conduct of a HAP auditor, it may submit a complaint to the HAP Regulatory Team or the accredited organisations managing the HAP certification process, as applicable. If the complainant is not satisfied with the outcome, it may refer the complaint to the CARB. The CARB will refer the complaint to the HAP Board if it considers the complaint to fall outside its area of competency.

Any complaint about the practice of a certified organisation may be raised with the HAP Regulatory Services Director, and will be addressed in accordance to the HAP procedure on complaints against members. The full procedure is available at <http://www.hapinternational.org/projects/complaints-handling/complaints-against-members.aspx>.

## **Components of the Process**

### **Qualifying norms**

When applying for certification, agencies are required to provide documentary evidence that they meet the qualifying norms for certification. This evidence will be validated during audits.

### **Pre-audit assessments**

There are two different types of pre-audit assessments that organisations need to undertake; the first one determines eligibility of the application for certification, while the second allows the certification process to proceed.

- *Status of compliance with the accountability framework and improvement plan*

One of the qualifying norms for certification requires the organisation to submit documentary evidence of its status of compliance with its accountability framework and of a plan for improving on this status. Organisations may use any assessment method that is suitable to them in order to produce this documentary evidence.

Acknowledging that the accountability framework of an organisation applying for HAP certification will, at a minimum, include the HAP Standard benchmarks, the organisation may choose to have a HAP Standard baseline analysis facilitated by HAP staff or an external consultant, or to undertake a self-assessment using the HAP Standard Self-assessment Kit.

- *Programme-site surveys against the HAP Standard*

Before proceeding with the audits, and preferably as part of its application for certification, the organisation is required to submit a summary report of surveys assessing status against each of the HAP Standard requirements across all programme / country sites. Prior to the mid-term progress audit (see below), the organisation is also required to submit to HAP a summary report prior to the mid-term progress audit, but only for those programme sites that have been established after certification was granted and no later than 3 months before the start date for the mid-term progress audit.

The summary report based on the programme-site surveys will inform HAP's selection of the programme site(s) for the audit and the mid-term progress audit. Before the audit takes place, each selected programme sites will be required to send a copy of their full survey to HAP, which will be used in preparation for the audit.

A summary report template and guidance for the brief programme-site surveys are available from HAP.

### **Certification audits**

When applying for HAP certification for the first time, agencies undergo a certification audit. The certification audit is a detailed independent assessment of how well an organisation is implementing the HAP Standard in its day-to-day operations.

The HAP certification audit comprises of three parts:

- *Review of documentary evidence.* Relevant policies, guidelines and other documentary evidence on how the organisation is implementing the HAP Standard are reviewed. Such evidence enables the auditor(s) to have a clear understanding of the operating practices of the organisation well in advance of the audit.
- *Head office audit.* The head office audit focuses on the extent to which the HAP Standard is met at the head office, and the systems that the organisation has in place to ensure that the Standard is met at programme sites. Head office staff and, where relevant, partners are interviewed during this phase. The head office audit usually takes three to four working days on site.
- *Programme site audit* at one or more programme sites<sup>1</sup> chosen by HAP. The programme site audit focuses on the extent to which the HAP Standard is met and how relevant policies and guidelines are implemented. Programme site staff, staff of partner organisations and crisis-affected people are interviewed during this phase. Each programme audit takes five to seven working days on site.

The auditors analyse and report on the review of documentary evidence and on the audits in a report that is shared with the organisation for correction of factual errors. The provision of evidence in support of certification is the responsibility of the governance body and the senior management of the applying organisation. It is the responsibility of the HAP auditors to express an opinion both on the documentary evidence provided and on the physical, testimonial and analytical evidence collected during the audit.

The auditor's report includes an executive summary with a recommendation on certification, details of the main findings from each audit, and corrective actions (non-compliance with requirements in the HAP Standard) with a proposed timeframe for addressing them (no longer than 18 months). The final report is forwarded to the HAP CARB for a decision on to whether the organisation be awarded

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<sup>1</sup> If the agency has over 24 programme sites, two or three of these will be selected for audit.

certification. If the organisation is granted certification, the CARB will also decide on any corrective action requests and their timeframe (no longer than 18 months). The final audit report is sent to the organisation for acknowledgment and signature.

A summary of the auditor's report is then made available on the HAP website. The summary report is intended to inform all relevant stakeholders of the organisation's certification status and the improvement plan that it will follow.

HAP's independent auditors undertake HAP certification audits.

The registrar of certified agencies is available here:

<http://www.hapinternational.org/projects/certification/certified-agency-register.aspx>

### **Mid-term Progress Audits and Mid-Term Progress report**

A mid-term progress audit (MTPA) may not be required for all certified organisations. Certified organisations are required to have a MTPA 18 months after certification has been granted, if they have more receive more than 6 corrective actions against the 2010 HAP Standard (or more than 3 against the 2007 HAP Standard).

Certified organisations that have 6 or less corrective actions must present the extent to which they are addressing corrective actions and improving accountability since the certification audit in their annual progress report to HAP.

The purpose of the MTPA is two-fold:

- *To follow up on other progress made since the certification audit and assess how the organisation is meeting the HAP Standard at other programme sites*

The HAP certification process acknowledges that organisations undergo continuous development changes. Therefore, 18 months after certification, a short audit will take place at the head office of the organisation to ascertain the extent to which developments since the certification audit are compliant with the HAP Standard.

A full audit will also take place at a programme site different from where the certification audit took place, to assess the extent to which the HAP Standard is met.

- *To confirm that corrective actions have been met*

The CARB may decide that an organisation be granted certification provided that it addresses corrective action requests (CARs). As soon as the organisation signs the audit report, the CARs become agreed corrective actions (ACAs) that the organisation has to address within the timeframe set by the CARB. In such instances, the organisation reports to HAP on progress on the ACAs, by submitting documentary evidence within the agreed timeframe. A mid-term progress audit may be conducted, where such documentary evidence is verified against other type of evidence at the head office and/or at the programme site where the certification audit took place.

HAP's independent auditors or HAP's Regulatory Services team undertake mid-term progress audits where the purpose is to follow up on other progress made by the organisation and to verify the documentary evidence submitted by the organisation as progress against its ACAs.

The MTPA is an audit, thus a similar process is followed as during the certification audits:

- *Review of documentary evidence.* Any relevant policies, guidelines and other documentary evidence, including that which became available since the certification audit, on how the organisation is implementing or making progress against the HAP Standard are reviewed.

- *Head office*: The purpose of this short audit is to validate the documentary evidence on progress made since the certification audit. This usually takes one or two working days on site.
- *New programme site MTPA*: This takes place at a different programme site than the certification audit. Programme site office staff, staff of partner organisations and people the organisation aims to assist are interviewed during this phase. The programme site audit takes between five and seven working days.

The auditor completes 2 reports, one for the head office audit and one for the programme site audit, including comments on compliance with ACAs, and any newly identified CARs. The programme site audit report is the same as a certification audit report. The reports are made available to the organisation for factual corrections and the final version is reviewed by HAP.

The MTPA reports are not forwarded to the HAP Certification and Accreditation Review Board unless it raises questions on the organisation's certified status.

The templates for the head office audit and programme site audit are available from HAP.

### **Re-certification audits**

Certified agencies that would like to maintain their status are required to undergo a re-certification audit.

Re-certification audits are a thorough review of an organisation's compliance with the HAP Standard every three years. All steps in the certification process are followed.

### **People in Aid Kite Mark 2**

If organisation has a People in Aid Kite Mark 2, requirements 2.1, 2.4, 2.5 of the HAP 2010 Standard will be accepted as met at head office and auditors will not review these requirements during the head office audit.

## Steps in the certification process

The HAP audit process moves through six main phases highlighted below.

**Table 1:** Overview the certification process (3 years)

	PHASE 1	PHASE 2	PHASE 3	PHASE 4	PHASE 5	PHASE 6	Recertification <sup>2</sup>
	<i>Steps 1-4</i>	<i>Steps 5-8</i>	<i>Steps 9-10</i>	<i>Steps 11-12</i>	<i>Steps 13-14</i>	<i>Steps 15-16</i>	
	Organisation applies, HAP confirms eligibility and agreement is reached on certification plan	The auditor and organisation prepare for certification audits with the support of the Regulatory Services Team	The audits take place	Auditor prepares report	The CARB makes a decision on certification	The organisation addresses ACAs and the MTPAs take place or mid-term progress report submitted	Organisation decides on re-certification and HAP develops plan, accordingly
Estimated duration	6 weeks	4-6 weeks	2-3 weeks	4 weeks	4 weeks	Varied, depending on ACAs	
Timeframe	4 - 5 months					18 months after certification	36 months after certification

### Phase 1: Application and agreement

#### Step 1: Expression of interest

The organisation expresses interest in HAP certification by contacting the HAP Secretariat, which replies with the application package.

#### Step 2: Application and review

The organisation submits the completed application form, including documentary evidence to substantiate that it is eligible to apply for HAP certification (i.e. that it meets the qualifying norms for certification as per the relevant HAP Standard) and an organigram. Organisations are

<sup>2</sup> For each re-certification process, all six phases are followed.

encouraged to also submit at application phase the summary report of surveys against the HAP Standard from all the country / programme sites where the organisation operates at the time of the application.<sup>3</sup>

HAP reviews the application and decides on whether the certification process can proceed. If the qualifying norms are not met, the organisation is invited to re-apply at a later date.

### **Step 3: Development of certification plan**

HAP identifies the auditor(s) and agrees dates with all parties. HAP and the auditor(s) then select the programme site(s) for the audit(s).

### **Step 4: Agreements on the certification plan**

HAP and the organisation agree and sign the audit agreement. HAP and the auditor agree and sign the audit contract.

## **Phase 2: Preparation for audits**

### **Step 5: Auditor's travel arrangements**

The auditor makes preliminary travel arrangements, to cover flights, visas, accommodation, as well as insurance and medical considerations. The applying organisation will provide assistance to the auditor to make the in-country travel arrangements. All travel arrangements are confirmed once approved by HAP.

### **Step 6: Collation and submission of documentary evidence**

HAP sends guidance and asks the organisation to prepare and submit policies, guidelines and relevant corporate statements required in the HAP Standard, alongside other documentary evidence that substantiates how it meets the HAP Standard. The organisation submits the evidence to HAP at least 20 working days prior to the date of each audit. HAP forwards to the auditor the documentary evidence, alongside other documentation such as copy of the application for certification and the summary report of surveys from programme sites. The auditor starts the review.

Guidance on documents to submit is available in the audit agreement.

### **Step 7: Audit site arrangements**

HAP sends the on-site planning checklist and requests the organisation to prepare information related to the audit sites. This information covers areas such as details about active projects and staff lists, security, (independent) language interpretation services, and any further advice or support needed in relation to visas, travel arrangements and accommodation. Once the organisation submits the requested information, HAP reviews it, reconfirms the audits, and forwards the details onto the auditor.

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<sup>3</sup> At the latest, the Summary Report of Surveys will be submitted under Step 3.

The auditor proceeds by contacting the organisation with requests for further information or support and to start developing the audit schedule. The audit schedule includes interviews with staff, people the organisation aims to assist and partners, and observation at project sites. Once the organisation replies, the auditor finalises the audit schedule, which it shares with the organisation and HAP.

#### **Step 8: Re-confirmation and last-minute arrangements**

HAP reviews the travel arrangements and audit schedule and, at least five working days before the date of travel, re-confirms with the organisation and the auditor that the audit(s) can proceed as planned. The auditor prepares for the trip.

### **Phase 3: The audits**

#### **Step 9: Head office audit**

The auditor will first carry out the audit at the head office of the applying organisation, following the audit schedule and audit activities.

#### **Step 10: Programme site audit(s)**

The programme site audit will follow. If the organisation has more than 24 programme / country sites, two or more programme site audits will be carried out.

Please note: Identification of a major non-compliance is grounds for denying (or withdrawing) certification. If during the audits, the auditor identifies a major non-compliance the auditor will immediately stop the audit and contact HAP's Regulatory Services Team. If HAP and the auditor agree that the evidence demonstrates a major non-compliance, the auditor will present the evidence to the applying organisation (audit focal point and relevant senior management). If the organisation is unable to provide evidence to the contrary, the audit is terminated. The organisation is invited to re-apply for certification at a later date.

### **Phase 4: Auditor's report and recommendation**

#### **Step 11: Audit findings and recommendation**

After each audit, the auditor prepares a report on findings, including details of minor non-compliances with requirements in the HAP Standard and corrective actions with a proposed timeframe for each to be addressed. Auditors will prepare and present the initial findings with the organisation the final day of the audit, so that the findings are shared with the organisation's staff prior to departure.

For each audit, the report consists of a summary, the main body of the report detailing the findings, corrective actions and annexes. In addition, the auditors will prepare the agreed corrective action forms.

### **Step 12: Report revision**

HAP reviews the auditor's report within five working days of receiving it and may request the auditor to provide more detail or clarifications. The report is then forwarded by HAP onto the organisation for factual corrections to be made within 10 working days.

After the organisation reviews the auditor's report, HAP forwards it onto the auditor who will address the organisation's comments, as appropriate, before submitting the final report to HAP.

## **Phase 5: Decision on certification**

### **Step 13: Submission of documentation**

HAP submits the auditor's report to the Certification and Accreditation Review Board (CARB). Both HAP and the organisation may submit separate notes to the CARB if they disagree with the auditor's conclusions and recommendation.

### **Step 14: CARB's decision**

The CARB reviews the auditor's report and any other documentation. Within 20 working days of receiving it, the CARB makes a decision on whether to accept the auditor's recommendation and grant the organisation HAP certification or not.

If certification is granted, HAP will send the organisation a certification package that includes a media statement, the final version of the auditor's report, the summary audit report, the HAP Certification Quality Mark with instructions on its use and the HAP certificate.

HAP also communicates to the organisation the CARB's decision on the Corrective Action Requests (CARs) that the organisation must address, and their timeframe. Once the organisation acknowledges the CARs, they become Agreed Corrective Actions (ACAs).

The CARB may decide to delay certification until a major non-compliance is addressed. If the organisation is not granted certification, it will have to re-apply for certification at a later date. If the CARB delays certification the organisation must address the major non-compliance(s) within the timeframe set by the CARB, which will not exceed three months unless there are exceptional circumstances, were an organisation could not reasonably be expected to meet the given timeframe. If the non-compliance is not addressed, the organisation must re-apply for certification at a later date.

### **Optional Step: Appeal**

An appeal by an organisation against auditor's recommendation will be considered and determined by the CARB before reaching a decision on the recommendation.

If the organisation is dissatisfied with the CARB's decision on the appeal, it may submit a final appeal to the HAP Board.

## **Phase 6: Required follow-up for certified agencies**

### **Step 15: Addressing Agreed Corrective Actions**

The certified organisation addresses Agreed Corrective Actions and reports to HAP, with documentary evidence and using the forms provided, within the timeframe agreed with the CARB. HAP checks the documentary evidence and confirms whether the ACAs have been addressed, in which case the respective ACAs are closed.

If the ACAs are not addressed and the organisation is not any progress, the HAP Regulatory Services team will recommend to the CARB that the certificate be withdrawn.

### **Step 16: Mid-term Progress Audit**

In line with the purpose of the Mid-term Progress Audits (MTPA), steps 3, 4, 5, 6, 7, 8, 9, 10 and 12 from above are repeated, taking into account minor adjustments as detailed in the MTPA section.

### **Optional Step: Appeal**

An appeal by an organisation against a decision by the HAP Regulatory Services team (or an accredited body) to withdraw certification will be considered and determined by the CARB.

### **Next phase: re-certification**

Six months before the HAP certificate expires, HAP will send the certified organisation information about re-certification. If the organisation decides to apply for re-certification, the steps in the certification process will be followed.