



Office of Internal Oversight Services

INTERNAL AUDIT DIVISION

REPORT 2014/114

Audit of disarmament, demobilization, repatriation/resettlement and reintegration activities in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo

Overall results relating to the effective management of disarmament, demobilization, repatriation/resettlement and reintegration activities in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo were initially assessed as partially satisfactory. Implementation of one important recommendation remains in progress

FINAL OVERALL RATING: PARTIALLY SATISFACTORY

24 November 2014
Assignment No. AP2013/620/08

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AUDIT REPORT

Audit of disarmament, demobilization, repatriation/resettlement and reintegration activities in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo

I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of disarmament, demobilization, repatriation/resettlement and reintegration (DDR/RR) activities in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo (MONUSCO).
2. In accordance with its mandate, OIOS provides assurance and advice on the adequacy and effectiveness of the United Nations internal control system, the primary objectives of which are to ensure: (a) efficient and effective operations; (b) accurate financial and operational reporting; (c) safeguarding of assets; and (d) compliance with mandates, regulations and rules.
3. MONUSCO was mandated by United Nations Security Council resolutions including 2098 (2013) and 2147 (2014) to provide advice and support to the Government of the Democratic Republic of the Congo for the design of a single overarching DDR/RR plan for Congolese and foreign combatants not suspected of any war crimes or violations of human rights, and support when appropriate, the implementation of the plan. Security Council resolution 2098 also established a Force Intervention Brigade in MONUSCO tasked with neutralizing armed groups, further increasing the need for DDR/RR.
4. The Government of the Democratic Republic of the Congo, with MONUSCO assistance and advice, developed the DDR/RR Plan III. The President endorsed the Plan in December 2013. However, while all parties agreed to the implementation plan in May 2014, and the Forces Démocratique de Libération du Rwanda indicated their willingness to disarm and join the DDR/RR programme, the process was stalled in August 2014. The process covering the Mouvement du 23 mars was also stalled, although advocacy efforts were underway to progress DDR/RR activities.
5. The DDR/RR Section was headed by a chief at the D-1 level reporting to the Deputy Special Representative of the Secretary-General (Rule of Law/Operations East) and had 19 professional officers, 6 Field Service officers, 14 United Nations volunteers and 13 national staff. It also received support from 86 national field staff budgeted under other Mission sections operating from 20 field locations.
6. The Section's budget for fiscal year 2013/14 was \$4.5 million. The Section also received contributions totaling \$987,000 from two donors for the period 1 January 2012 to 31 December 2013 of which, \$500,000 was administered by the United Nations Development Programme.
7. Comments provided by MONUSCO are incorporated in italics.

II. OBJECTIVE AND SCOPE

8. The audit was conducted to assess the adequacy and effectiveness of MONUSCO governance, risk management and control processes in providing reasonable assurance regarding the **effective management of DDR/RR activities in MONUSCO**.

9. The audit was included in the 2013 risk-based work plan of OIOS due to the strategic, operational and reputational risks of MONUSCO not achieving its mandate to support an effective DDR/RR process.
10. The key controls tested for the audit were: (a) risk assessment and strategic planning; and (b) project management. For the purpose of this audit, OIOS defined these key controls as follows:
- (a) **Risk assessment and strategic planning** - controls that provide reasonable assurance that risks relating to DDR/RR are identified and assessed; appropriate actions are taken to mitigate or anticipate these risks; and strategic plans are in place to drive the DDR/RR support MONUSCO provides to the Government of the Democratic Republic of Congo.
 - (b) **Project management** - controls that provide reasonable assurance that there is sufficient project management capacity to achieve DDR/RR mandated activities. This includes: sufficient financial resources; competent human resources; and appropriate project management tools, methodology and systems.
11. The key controls were assessed for the control objectives shown in Table 1.
12. OIOS conducted the audit from December 2013 to May 2014 and covered the period from January 2012 to May 2014. The audit included visits to the DDR/RR camps in Goma, Bukavu and Uvira.
13. The audit team conducted an activity-level risk assessment to identify and assess specific risk exposures, and to confirm the relevance of the selected key controls in mitigating associated risks. Through interviews, analytical reviews and tests of controls, OIOS assessed the existence and adequacy of internal controls and conducted necessary tests to determine their effectiveness.

III. AUDIT RESULTS

14. The MONUSCO governance, risk management and control processes examined were initially assessed as **partially satisfactory**¹ in providing reasonable assurance regarding the **effective management of DDR/RR activities in MONUSCO**. OIOS made three recommendations to address the issues identified. During 2013 and 2014, MONUSCO successfully assisted the Government in developing the DDR/RR Plan III which included the recommencement of reintegration activities for Congolese ex-combatants that was suspended in 2010. The Mission was also effective in sensitization activities and the control of surrendered weapons. However, MONUSCO needed to: (a) implement donor funded activities as planned; (b) expedite the recruitment of the Head of the DDR/RR Section; and (c) advance the implementation of the DDR/RR integrated management information system.
15. The initial overall rating was based on the assessment of key controls presented in Table 1. The final overall rating is **partially satisfactory** as implementation of one important recommendation remains in progress.

¹ A rating of “**partially satisfactory**” means that important (but not critical or pervasive) deficiencies exist in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Table 1: Assessment of key controls

Business objective	Key controls	Control objectives			
		Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules
Effective management of DDR/RR activities in MONUSCO	(a) Risk assessment and strategic planning	Satisfactory	Satisfactory	Satisfactory	Satisfactory
	(b) Project management	Partially satisfactory	Partially satisfactory	Satisfactory	Partially satisfactory
FINAL OVERALL RATING: PARTIALLY SATISFACTORY					

A. Risk assessment and strategic planning

The Mission provided support to the government in developing one overarching disarmament, demobilization, repatriation/resettlement and reintegration plan

16. MONUSCO was required to apply the Department of Peacekeeping Operations (DPKO) Integrated Disarmament, Demobilization and Reintegration Standards in the preparation of a strategic plan for supporting the government in designing a DDR/RR plan. The plan was to be aligned with the Mission’s mandate and based on: information on armed groups, women and children associated with armed groups, and weapons and other factors. Further Security Council resolutions 2098 and 2147 mandated MONUSCO to provide advice and support to the Government of the Democratic Republic of Congo for the design of a single DDR/RR plan for Congolese and foreign combatants.

17. MONUSCO developed DDR/RR strategic plans and results-based budgets for 2012/13 and 2013/14, which were aligned with the Mission’s mandate and included: (a) the potential impact of actions of the Force Intervention Brigade on the local population and MONUSCO personnel; (b) the detailed support needed by the government to design and implement its DDR/RR plan; and (c) strategies for major foreign and Congolese armed groups.

18. MONUSCO established a DDR/RR Strategy Group comprising of the Mission, the United Nations Country Team and a Partnership Coordination Group consisting of donors, the European Union and the Southern African Development Community. The DDR/RR Strategy Group provided advice and support to the government in developing a single overarching DDR/RR plan. A review of minutes of the DDR/RR Strategy Group, notes from a DDR/RR conference held in June 2013, the DDR/RR Plan III, and interviews with the two Deputy Special Representatives of the Secretary-General and the Officer-in-Charge of the DDR/RR Section indicated that the government with support provided by MONUSCO, successfully developed DDR/RR Plan III. MONUSCO also facilitated consultations with the government, civil society, international donors, United Nations Country Team and the World Bank. OIOS concluded that the Mission had implemented adequate controls to ensure the effective provision of support to the government in developing one overarching DDR/RR plan.

Detailed implementation plan for the Disarmament, Demobilization, Repatriation/Resettlement and Reintegration Plan III had been finalized

19. The DDR/RR Plan III and the DPKO Operations Integrated Disarmament, Demobilization and Reintegration Standards required the development of a detailed implementation plan with timelines and a budget.

20. The finalization of the DDR/RR implementation plan, particularly the part relating to the reinsertion and reintegration of Congolese ex-combatants, which required the support of the Partnership Coordination Group, was delayed from December 2013 to May 2014. This was because MONUSCO and donors did not agree with the implementation plan proposed by the government, as it deviated from some key principles of the DDR/RR Plan III. These included disagreements regarding: (a) the government's proposal for the relocation of ex-combatants to the west of the country with potential increased logistical support cost to MONUSCO; and (b) lack of details on the proposed budget of \$100 million. By May 2014 the disagreements had been resolved and the implementation plan was finalized. OIOS concluded that MONUSCO had adequately prepared a detailed DDR/RR implementation plan as required.

Provincial work plans, tailored to local requirements, had been prepared

21. The MONUSCO DDR/RR strategic plan required three of its regional teams to: prepare and implement detailed work plans targeting the armed groups in each region; and coordinate their work with stakeholders including those across borders. The strategic plan also required close coordination with the Public Information Unit in work on sensitizing ex-combatants.

22. A review of the three provincial and the Public Information Unit work plans for 2012/13 and 2013/14 and interviews with DDR/RR staff in Goma, Bukavu, Uvira and Dungu indicated that the plans targeted armed groups operating in each region as required by the strategic plan and had been adequately implemented. During 2012/13 and 2013/14, the DDR/RR Section updated the work plans in collaboration with other MONUSCO sections and the military through joint working groups. OIOS concluded that the provincial work plans were properly prepared and tailored to meet local requirements.

B. Project management

Vacancies in two key posts impacted on the work of the disarmament, demobilization, repatriation/resettlement and reintegration programme

23. The Field Personnel Division/Department of Field Support standard operating procedures on Staff Selection System established that the number of days from identification of vacancy to selection from roster was 21 days and that for position-specific job openings it was 83 to 98 days based on a posting duration of 15 or 30 days.

24. The post of Head of the DDR/RR Section, at the D-1 level, had been vacant since April 2012. MONUSCO delayed initiating the recruitment as the DDR/RR programme had not gained momentum during the period from 2010 to 2013. However, as MONUSCO had re-prioritized the DDR/RR programme in 2013 as one of the strategic pillars, the Mission needed to build the capacity of the Section to provide sustained strategic input, guidance and advocacy, and to coordinate and raise funds from donors.

25. In the absence of a substantive Head of the DDR/RR Section, MONUSCO faced challenges in arranging senior level meetings with government officials. This was partly mitigated by interventions by

the Deputy Special Representative of the Secretary-General (Rule of Law/Operations East) who organized some meetings with senior government officials (a task that would have been performed by the Head). Discussions with the Deputy Special Representative of the Secretary-General (Rule of Law/Operations East) and the Officer-in-Charge of the DDR/RR Section, and a review of related documentation showed that there were unsuccessful attempts at recruiting the Head of the DDR/RR Section. However, in May 2014 MONUSCO re-initiated action to fill the post. MONUSCO also needed to recruit for a P-4 Operations Officer post, which became vacant in December 2013, to ensure the smooth implementation of the DDR/RR programme.

(1) MONUSCO should expedite the recruitment of the Head and the Operations Officer for the Disarmament, Demobilization, Repatriation, Resettlement and Reintegration Section.

MONUSCO accepted recommendation 1 and stated that the position of Head of the DDR/RR Section was filled through a temporary job opening and the Director arrived in Goma on 4 September 2014. In addition, the job opening was simultaneously advertised in Inspira and the shortlisted candidates would be interviewed in November 2014. The post of Operations Officer was filled in May 2014. Recommendation 1 remains open pending confirmation that the post of the Head of the DDR/RR Section has been filled.

Public information and sensitization efforts were adequately performed, and sensitization plans were updated

26. The MONUSCO DDR/RR strategic plan on public information and sensitization of armed groups required activities to be tailored for different armed groups. This included appropriateness of channels used, language, timing and physical contact where possible.

27. A review of the MONUSCO sensitization activities against plans indicated that the DDR/RR Section had been effective in implementing planned activities and that the plans were tailored to the different armed groups. Additionally, during 2013 the Deputy Special Representative of the Secretary-General (Rule of Law/Operations East) and the Force Commander appealed directly to all armed groups to surrender during weekly press conference broadcasts on Radio Okapi, national radio and television, and community radio stations. A review of records of surrenders and the press indicated that, following the defeat of Mouvement du 23 mars in November 2013, there was an increase in surrenders. For example, there were approximately 3,500 ex-combatants in national army camps as of March 2014 compared to 958 received by the Mission over 11 months to November 2013. OIOS concluded that public information and sensitization efforts were adequately performed.

Surrendered weapons were effectively controlled

28. The DPKO Integrated Disarmament, Demobilization and Reintegration Standards and the MONUSCO standard operating procedures on weapons management required only appropriately qualified personnel to handle and securely store arms and bullets, prior to MONUSCO handover to the United Nations Mine Action Coordination Centre for destruction.

29. A review of records of weapons received between 1 January 2012 and 31 December 2013 as well as inspections to assess the physical security storage facilities in Goma and Bukavu, and interviews with responsible DDR/RR Section staff indicated that arms and bullets were only handled by experienced military personnel and were securely stored. There were also adequate procedures for their handover to the United Nations Mine Action Coordination Centre for destruction. The United Nations Mine Action Coordination Centre destroyed a total of 926 weapons and 38,801 pieces of ammunition in November 2013. OIOS concluded that surrendered weapons were effectively controlled.

Donor funded activities had not been implemented as planned

30. MONUSCO received contributions from two donors for DDR/RR operations totaling \$987,000 for the period from 1 January 2012 to 31 December 2013. The United Nations Development Programme administered the contribution from one donor, and the memorandum of understanding required MONUSCO to prepare narrative reports on the status of the project, with United Nations Development Programme responsible for preparing financial reports within three months after the end of the year. Both contributions specified allocations that included within-mission travel, sensitization flyers, radio broadcasting equipment, field sensitizers and consultants.

31. A review of the annual reports for 2012 and 2013 prepared by the DDR/RR Section indicated that MONUSCO had not spent all of the contributions by the end of 2013 resulting in requests for \$488,000 or 49 per cent to be rolled over into 2014. The under-expenditure for the MONUSCO-managed contribution was attributed to: (a) delays in the procurement process due to ineffective coordination between the DDR/RR and the Supply Section for purchases over \$4,000, which the DDR/RR Section could not process as it was not a self-accounting unit; and (b) delays in granting DDR/RR users access to Umoja. MONUSCO and the United Nations Development Programme also experienced delays in importation of spare parts for mobile radio broadcasting equipment due to customs clearance procedures. The DDR/RR Section was taking action to mitigate future delays.

(2) MONUSCO should implement procedures to improve coordination between the Disarmament, Demobilization, Repatriation, Resettlement and Reintegration (DDR/RR) Section and the Supply Section for receipt of goods over \$4,000, and ensure relevant DDR/RR Section staff have access to Umoja.

MONUSCO accepted recommendation 2 and stated that supply of non-food and food items was now done through the Chief, Integrated Support Services on a monthly basis upon assessment of requirements. All relevant DDR/RR staff were granted access to Umoja after appropriate training was provided. Based on the action taken by MONUSCO, recommendation 2 has been closed.

Disarmament, demobilization, repatriation/resettlement and reintegration management information system had not been implemented successfully

32. The DPKO Integrated Disarmament Demobilization and Reintegration Standards required that management information systems be installed to enable efficient and effective screening, profiling and tracking of ex-combatants and information sharing with national authorities and other stakeholders.

33. MONUSCO started implementing a system called Sunrise in 2010 using funds contributed by a donor. However, when the funding was used up by mid-2012, the system was still not fully operational. Consequently, the DDR/RR Section continued to process DDR/RR clients and reports manually resulting in inaccurate operational reporting. However, in December 2013, the DDR/RR Section requested additional funding, and MONUSCO allocated \$27,000 from residual donor contributions to complete the implementation of Sunrise, pending approval of the concerned donor. As of August 2014, MONUSCO had not yet implemented the system and the required resource plan had not been finalized with the donor.

(3) MONUSCO should develop an action plan to complete the disarmament, demobilization, repatriation/resettlement and reintegration management information system.

MONUSCO accepted recommendation 3 and stated that in October 2014 the Communications and Information Technology Section optimized the DDR/RR spreadsheets and a web-based system was

created to register all information. Some DDR/RR staff members including the database manager were trained on the use of the system. Based on the action taken by MONUSCO, recommendation 3 has been closed.

Children associated with armed forces and groups were effectively processed

34. The MONUSCO standard operating procedure on DDR/RR required all children associated with armed forces and groups under the age of 18 to be handed over to the MONUSCO Child Protection Section for further screening and onward handover to the United Nations Children’s Fund.

35. The DDR/RR Section received and processed 360 and 543 children in 2012 and 2013 respectively and handed them into the care of the United Nations Children’s Fund. A review of 20 records and interviews with the DDR/RR and field Child Protection Officers indicated that they were collaborating effectively to identify children associated with armed forces and groups, and mitigate the risk of these children being re-recruited or harmed. Additionally, in collaboration with the United Nations Children’s Fund, MONUSCO repatriated and handed over Rwandan children to their families when their safety was assured. OIOS concluded that children associated with armed forces and groups were effectively processed.

IV. ACKNOWLEDGEMENT

36. OIOS wishes to express its appreciation to the management and staff of MONUSCO for the assistance and cooperation extended to the auditors during this assignment.

(Signed) David Kanja
Assistant Secretary-General for Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

**Audit of disarmament, demobilization, repatriation/resettlement and reintegration activities in the United Nations Organization
Stabilization Mission in the Democratic Republic of the Congo**

Recom. no.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
1	MONUSCO should expedite the recruitment of the Head and the Operations Officer for the Disarmament, Demobilization, Repatriation, Resettlement and Reintegration Section.	Important	O	Confirmation that the post of Head of the DDR/RR Section is filled.	November 2014
2	MONUSCO should implement procedures to improve coordination between the Disarmament, Demobilization, Repatriation, Resettlement and Reintegration (DDR/RR) Section and the Supply Section for receipt of goods over \$4,000, and ensure relevant DDR/RR Section staff have access to Umoja.	Important	C	Action taken.	Implemented
3	MONUSCO should develop an action plan to complete the disarmament, demobilization, and repatriation/resettlement and reintegration management information system.	Important	C	Action taken.	Implemented

¹ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

² Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

³ C = closed, O = open

⁴ Date provided by MONUSCO in response to recommendations.

APPENDIX I

Management Response



MONUSCO

Mission de l'Organisation des Nations Unies
pour la Stabilisation en République
démocratique du Congo

United Nations Organisation Stabilization
Mission in the Democratic Republic of Congo

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INTEROFFICE MEMORANDUM

22 October 2014
Ref. O/DMS/14/OM/03086

To: Ms. Eleanor T. Burns
Director, Internal Audit Division, OIOS

From: Abdallah Wafy
Deputy SRSG Rule of Law/Operations East
MONUSCO

Subject: **Assignment No. AP2013/620/08 - Audit of Disarmament, Demobilization, Repatriation, Resettlement and Reintegration activities in MONUSCO**

1. Your interoffice memorandum reference IAD-14-7-5-7 (21) dated 10 October 2014 refers.
2. Attached please find Mission response in respect of the recommendations in the draft audit report. Supporting documents will be provided to the Resident Audit Team.

Kind regards.

Cc Mr. Moustapha Soumare, Deputy Special Representative of the Secretary-General,
Resident/Humanitarian Coordinator, MONUSCO
Mr. Guy Siri, Director of Mission Support, MONUSCO
Mr. Jean-Marc Tafani, OIC DDR/RRR Section, MONUSCO
Ms. Jacoba Genis, Audit Focal Point, MONUSCO
Ms. Cynthia Avena-Castillo, Professional Practices Section, IAD, OIOS
Mr. Laud Botchwey, Chief Resident Auditor for MONUSCO, OIOS

Peace it!

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Management Response

Audit of disarmament, demobilization, repatriation/resettlement and reintegration activities in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	MONUSCO should expedite the recruitment of the Head and the Operations Officer for the Disarmament, Demobilization, Repatriation, Resettlement and Reintegration Section.	Important	Yes	Deputy Special Representative of the Secretary-General, Rule of Law/ Operations East	4 September 2014	<p>The position for Director of Disarmament, Demobilization, Repatriation, Resettlement and Reintegration Section (DDR/RR) has been filled through a Temporary Job Opening. The Director arrived in Goma on 4 September 2014. In addition, the Position Specific Job Opening was simultaneously advertised in Inspira and the shortlisted candidates will be interviewed on 05 and 06 November 2014.</p> <p>As acknowledged in paragraph 29 of the draft report, the post of Operations Officer was filled in May 2014.</p>

¹ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

² Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Management Response

Audit of disarmament, demobilization, repatriation/resettlement and reintegration activities in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
2	MONUSCO should enhance coordination between the Disarmament, Demobilization, Repatriation, Resettlement and Reintegration (DDR/RR) Section and the Supply Section for purchases over \$4,000 and grant relevant DDR/RR Section staff access to Umoja, to ensure effective implementation of donor funded activities relating to the DDR/RR programme.	Important	Yes	DDR/RR Officer Monitoring, Planning and Reporting Team	July 2014	<p>To enhance coordination and improve implementation of donor funded DDR/RR activities, supply of non-food items and food items is done through an Inter-Office Memorandum approved by the Chief, Integrated Support Services on a monthly basis upon assessment of requirements, as DDR/RR is not a Cost Center. Examples of such Inter-Office Memoranda have been provided to the Resident Audit Team.</p> <p>As acknowledged in paragraph 37 of the draft report, all relevant DDR/RR staff members now have access to UMOJA after completing the on-line Computer-Based Training courses as well as instructor led training. Training was also conducted by Finance Section staff for all petty cash custodians, including DDR/RR custodians. Additional training will be presented by Finance Section as and when required and requested by DDR/RR.</p>

¹ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

² Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Management Response

Audit of disarmament, demobilization, repatriation/resettlement and reintegration activities in the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo

Rec. no.	Recommendation	Critical¹/ Important²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
3	MONUSCO should develop an action plan to complete the disarmament, demobilization, and repatriation/resettlement and reintegration management information system.	Important	Yes	DDR/RR Officer, Monitoring, Planning and Reporting Team	September 2014	<p>The DDR/RR spreadsheets were optimized by Communications and Information Technology Section and a web-based share point was created to register all the information. Some DDR/RR staff members were trained on the use of the share point and the management of the share point was handed over to the DDR/RR Database Manager. The link together with the list of DDR/RR staff members with access rights to the share point has been provided to the Resident Audit Team.</p> <p>The development and implementation of a DDR/RR management information system falls outside the resources and authority of the Mission and will be escalated to Information Communication and Technology Division for consideration and possible approval.</p>

¹ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

² Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.