

INTERNAL AUDIT DIVISION

REPORT 2015/127

Audit of the conduct and discipline function in the United Nations

Operation in Côte d'Ivoire

Overall results relating to the effective management of the conduct and discipline function in the United Nations Operation in Côte d'Ivoire were initially assessed as unsatisfactory. Implementation of two important recommendations remain in progress

FINAL OVERALL RATING: PARTIALLY SATISFACTORY

21 October 2015 Assignment No. AP2014/640/04

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AUDIT REPORT

Audit of the conduct and discipline function in the United Nations Operation in Côte d'Ivoire

I. BACKGROUND

- 1. The Office of Internal Oversight Services (OIOS) conducted an audit of the conduct and discipline function in the United Nations Operation in Côte d'Ivoire (UNOCI).
- 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. The Conduct and Discipline Team (CDT) was responsible for receiving, assessing and referring allegations of misconduct to appropriate investigative bodies of the United Nations and Member States. CDT acted as the principal adviser to the Head of Mission and provided: (a) policy guidance and technical advice; and (b) assistance in developing preventive strategies for responding to personnel misconduct, and disseminating United Nations guidelines, policies and procedures on conduct and discipline.
- 4. CDT was headed by a Chief at the P-5 level who reported to the Chief of Staff and was supported by one professional staff at the P-4 level, one field service staff, one national professional officer and one general service staff. CDT also had two military staff assigned from the Office of the Chief of Military Personnel. The budget for CDT for the fiscal year 2014/15 was \$555,000, which included \$527,000 for staff costs and \$28,000 for training.
- 5. Comments provided by UNOCI are incorporated in italics.

II. OBJECTIVE AND SCOPE

- 6. The audit was conducted to assess the adequacy and effectiveness of UNOCI governance, risk management and control processes in providing reasonable assurance regarding the **effective management of the conduct and discipline function in UNOCI**.
- 7. The audit was included in the 2014 risk-based work plan of OIOS because of risks relating to the management of conduct and discipline activities by CDT.
- 8. The key controls tested for the audit were: (a) regulatory framework; and (b) coordinated management. For the purpose of this audit, OIOS defined these key controls as follows:
 - (a) **Regulatory framework** controls that provide reasonable assurance that policies and procedures: (i) exist to guide conduct and discipline activities in UNOCI; (ii) are complied with; and (iii) ensure the reliability and integrity of financial and operational information; and
 - (b) **Coordinated management** controls that provide reasonable assurance that potential overlaps in the performance of the conduct and discipline function in UNOCI are identified,

discussed and mitigated, and adequate coordination is in place with relevant United Nations partners.

- 9. The key controls were assessed for the control objectives shown in Table 1. One control objective shown in Table 1 as "Not assessed" was not relevant to the scope defined for this audit.
- 10. OIOS conducted the audit from November 2014 to March 2015. The audit covered the period from 1 January 2013 to 31 December 2014. Field visits were conducted to mission locations in Daloa, Duekoue, Guiglo, Yamoussokro and Bouake.
- 11. OIOS 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 and analytical reviews, OIOS assessed the existence and adequacy of internal controls and conducted necessary tests to determine their effectiveness.

III. AUDIT RESULTS

- 12. The UNOCI governance, risk management and control processes examined were initially assessed as **unsatisfactory**¹ in providing reasonable assurance regarding the **effective management of the conduct and discipline function in UNOCI**. OIOS made seven recommendations to address the issues identified. UNOCI established appropriate procedures to make complaints, provided functional welfare and recreation facilities, effectively managed the Misconduct Tracking System, and prepared monthly/quarterly reports for senior management. To improve the functions of CDT, UNOCI needed to: (a) develop a strategy to increase awareness of the local population on expected conduct of United Nations personnel; (b) assign police officers to CDT to centralize the function; (c) develop and implement a risk assessment framework; (d) document decisions to close misconduct allegations; (e) follow up regularly with investigating bodies regarding the status of cases; (f) include individual contractors in its conduct and discipline training programmes; and (g) establish a mechanism to record interactions with victims of abuse and of the assistance provided.
- 13. The initial overall rating was based on the assessment of key controls presented in Table 1. The final overall rating is **partially satisfactory** 2 as implementation of two important recommendations remains in progress.

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¹ A rating of "unsatisfactory" means that one or more critical and/or pervasive important deficiencies exist in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² 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

		Control objectives						
Business objective	Key controls	Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules			
Effective management	(a) Regulatory	Unsatisfactory	Unsatisfactory	Not assessed	Unsatisfactory			
of the conduct and	framework							
discipline function in	(b) Coordinated	Partially	Partially	Not assessed	Partially			
UNOCI	management	satisfactory	satisfactory		satisfactory			
FINAL OVERALL RATING: PARTIALLY SATISFACTORY								

A. Regulatory framework

There was a need for a public information strategy

- 14. The public information guidelines for allegations of misconduct committed by personnel of United Nations peacekeeping and other field missions require UNOCI to develop a public information strategy to guide the creation of public information products related to sexual exploitation and abuse. The Department of Field Support Advisory on conduct and discipline in field missions (DFS Advisory) requires CDT, in collaboration with UNOCI Public Information Office, to implement outreach activities for the host population to raise awareness on issues related to conduct and discipline and to evaluate and assess the impact of such activities.
- 15. A review of outreach activities for the audit period indicated that conduct and discipline officers and staff of the Public Information Office conducted a joint awareness raising campaigns during United Nations Day celebrations in November 2014 and quarterly in select regions. However, they did not conduct widespread outreach/awareness raising activities for the majority of the host population, and posters on preventing and reporting sexual exploitation and abuse were available only in UNOCI premises and not in local communities. Insufficient outreach/awareness raising activities in local communities resulted as UNOCI had not allocated adequate resources to develop a public information strategy and an action plan to guide external sensitization programmes on sexual exploitation and abuse. As a result, there was a risk that the local population was not fully aware of the United Nations policy against sexual exploitation and abuse and mechanisms for reporting allegations, increasing the risk of misconduct cases going unreported.
 - (1) UNOCI should allocate adequate resources to develop a public information strategy and action plan to create awareness among the local population on expected conduct of United Nations personnel and the mechanisms for reporting complaints.

UNOCI accepted recommendation 1 and stated that external and internal communication strategies were developed and approved by the Head of Mission in September 2015 to guide the Mission's outreach activities. Based on the action taken by UNOCI and OIOS verification, recommendation 1 has been closed.

Safe and confidential complaint reception mechanisms were established

- 16. The DFS Advisory requires CDT to establish efficient, safe, confidential, transparent and accessible complaint reception mechanisms for the receipt of misconduct allegations.
- 17. An inspection indicated that CDT office facilities were safe and accessible and ensured confidentially of the complaint reception process. This included: (a) a designated private room equipped with land and mobile telephone hotlines; and (b) a confidential e-mail address for receiving complaints. OIOS concluded that adequate controls were established to enable Mission personnel and the local population to report cases of misconduct confidentially to CDT.

The Mission reminded all personnel that allegations needed to be reported to the Conduct and Discipline Team in a timely manner

- 18. The UNOCI standard operating procedures on reporting of misconduct require all Mission personnel to immediately report misconduct allegations to CDT. Additionally, the DFS Advisory provides that CDT complete the assessment of allegations within seven days from the receipt of the allegation and refer it to the appropriate investigation body.
- 19. A review of 30 of the 79 cases reported to CDT in the audit period indicated that in 10 cases, Mission personnel reported the allegation within 24 hours. However, 15 cases were reported after an average of 20 days and the remaining 5 cases after 105 days. All 30 cases reviewed indicated that CDT assessed the allegations and referred them to the appropriate investigative body within seven days as required. The delay in reporting allegations to CDT resulted because UNOCI had not reminded staff members of the requirement to report allegations in a timely manner. As a result, there was an increased risk of loss of evidence to support the allegations, hindering the investigation process. Subsequent to the audit, on 4 August 2015, UNOCI issued an information circular reminding all staff members to report allegations of misconduct involving UNOCI personnel to CDT or any responsible United Nations official immediately when they are detected. Based on the action taken by UNOCI, OIOS did not make a recommendation.

Monthly and quarterly reports were submitted in a timely manner

- 20. The DFS Advisory requires CDT to record and track all allegations of misconduct and prepare and submit monthly/quarterly reports on its conduct and discipline activities to DFS with copies to the Head of Mission and other senior Mission personnel.
- 21. A review of all available 17 reports prepared by CDT from January 2013 to September 2014 indicated that CDT prepared and submitted the required monthly/quarterly reports to DFS, the Head of Mission and senior Mission personnel. The reports included all relevant issues including: meetings with senior management, training activities and number of personnel trained, complaints or allegations received and risk assessment activities undertaken during the period. OIOS concluded that UNOCI implemented adequate controls to ensure that monthly/quarterly reports were prepared and submitted to DFS and senior management as required.

The police component did not report cases involving United Nations police officers to the Conduct and Discipline Team

22. The DFS Advisory and UNOCI standard operating procedures require all information on allegations and/or acts of misconduct by a United Nations staff member to be reported to CDT for assessment and recommendation for further action.

- 23. A review of the misconduct reporting procedures in UNOCI indicated that CDT did not review and assess misconduct cases involving civilian police, as the police component was handling such allegations directly. This was because the police component did not assign officers to CDT and instead established its own Conduct and Discipline Cell, comprising focal points responsible for processing conduct and discipline matters related to civilian police. However, the police component did not have adequate capacity, tools and secure complaint reception facilities to properly assess cases and ensure confidentiality.
- 24. As a result, 7 (47 per cent) of all 15 cases reported to the police component's conduct and discipline focal points during the audit period were not investigated because the focal points did not maintain sufficient and reliable records to facilitate investigation of the cases. Also, in June 2014, a focal point closed a sexual exploitation and abuse allegation reported by a local citizen after concluding that the perpetrator was not a United Nations police officer. However, the police component did not refer the case to CDT for further review and assessment. CDT relied on the investigation report and conclusions reached by the United Nations police component and concurred with the results of the investigation without conducting further assessment of the allegation before the case was closed.
- 25. The inadequate assessment of allegations submitted to the police component resulted because of the lack of representation in and cooperation with CDT who had the expertise and were trained to assess the cases for further investigation. The current structure in UNOCI whereby the police component, without adequate capacity and tools, were reviewing and assessing allegations posed a significant risk that allegations of misconduct were not properly reviewed and acted on, damaging the reputation of the Mission.
 - (2) UNOCI should assign police officers to the Conduct and Discipline Team to ensure that conduct and discipline matters affecting police personnel in the Mission are coordinated, assessed and monitored effectively by the Conduct and Discipline Team.

UNOCI accepted recommendation 2 and stated that upon instructions from the Head of Mission on 15 July 2015, the Police Commissioner assigned a United Nations police officer with relevant skills and experience to CDT to ensure that conduct and discipline matters affecting police personnel were coordinated, assessed and monitored effectively by CDT. The selected United Nations Police Officer commenced his service with CDT on 8 September 2015. Based on the action taken by the Mission and OIOS verification, recommendation 2 has been closed.

Assessment visits were not regularly conducted and risk assessment framework was not established

- 26. The Conduct and Discipline Unit/DFS code cable on accountability measurement framework and reporting of July 2014 requires CDT to conduct regular visits to sectors to establish and implement a risk assessment framework to identify risks, assess preventive measures, monitor activities and identify risks of misconduct associated with United Nations personnel.
- 27. A review of all 17 monthly reports and one quarterly report issued by CDT to Mission management indicated that CDT visited 38 (61 per cent) of the 62 Mission camps/sector offices. The remaining 24 military camps (39 per cent) with over 3,364 military personnel were not visited for two years. This resulted as CDT had not developed a schedule to conduct assessment visits to ensure that all locations were visited over a period of time. Further, CDT did not use the results of assessment visits to develop a risk assessment framework as conduct and discipline officers had not been trained on how to develop the framework. CDT was of the view that instructions provided by DFS were not sufficient.

- 28. Inadequate assessment visits and the lack of a risk assessment framework impeded the ability of CDT to identify emerging risks and implement appropriate preventive measures. There was also the risk that high-risk locations or activities may not be identified and managed in a timely manner to prevent misconduct.
 - (3) UNOCI should: (a) arrange for DFS to provide further instructions and training to the Conduct and Discipline Team on the development of a risk assessment framework; and (b) develop and implement a schedule to visit all Mission locations annually to ensure adequate assessment of risks and implementation of preventive measures.

UNOCI accepted recommendation 3 and stated that it requested DFS for training and assistance on how to develop a risk assessment framework. Based on information received from DFS, the Mission developed a table showing all UNOCI military contingents serving the mission area, their camps and locations and deployment date. The table would serve to coordinate CDT visits to UNOCI military camps and help ensure proper risk assessment. In this connection, CDT had visited all military camps since May 2015. Based on the action taken by the Mission and OIOS verification, recommendation 3 has been closed.

Closure of unsubstantiated allegations was not approved by the Head of Mission

- 29. The DFS Advisory requires CDT to carry out an assessment of complaints received and record information provided by the complainant and all relevant information in the Misconduct Tracking System. The Advisory requires CDT to inform the Head of Mission of the results of its assessments and close all cases where the Head of Mission authorizes and approves the findings as unsubstantiated, and maintain records thereof.
- 30. A review of 30 of the 79 misconduct cases in the Misconduct Tracking System indicated that relevant documents supporting 25 cases such as referral memoranda, code cables, investigation reports, administrative action taken, and important communications were uploaded into the System and cases were appropriately closed. However, for five cases CDT closed them without approval of the Head of Mission. This was because CDT declared these allegations as unsubstantiated and for such cases was not documenting their decisions and submitting them to the Head of Mission for review and approval prior to closing the case. The lack of documentation to support reasons for closure of unsubstantiated cases and inadequate reporting to the Head of Mission increased the risk of cases not being properly processed.
 - (4) UNOCI should document all decisions to close misconduct allegations and submit them to the Head of Mission for approval prior to the case being closed in the Misconduct Tracking System.

UNOCI accepted recommendation 4 and stated that all decisions to close cases involving allegations of misconduct had been approved by the Head of Mission in writing since March 2015. Based on the action taken by the Mission and OIOS verification, recommendation 4 has been closed.

Open cases in the Misconduct Tracking System were not consistently followed up

31. The DFS Advisory requires CDT to follow up on allegations under investigation and include details of the updated status in the Misconduct Tracking System. The Advisory prescribes the following frequency for follow-up: (a) every three months for investigations conducted by investigative bodies of field missions; (b) every three months for investigations on sexual exploitation and abuse; (c) every six

months for investigations on other types of allegations conducted by the Investigations Division of OIOS; and (d) every six months for investigations conducted by Member States through DFS.

32. An aging analysis of open allegations in the Misconduct Tracking System as of March 2015 showed that there were 104 cases with investigation bodies and offices pending review and closure. Further analysis of all 24 cases that had been outstanding for over five years indicated that these cases had pending actions from various entities including troop contributing countries, DFS, the Office of Human Resources Management, CDT and the Ivorian Authorities. A review of follow-up actions in the quarterly reports indicated that CDT was not consistently following up on the status of pending cases. For example, CDT had not followed up with DFS on the status of five pending cases to facilitate the completion of these cases. While CDT advised that it conducted regular aging analysis of pending cases, CDT did not document the follow-up actions being taken. The lack of regular follow-up on the status of investigations increases the risk of delays in the closure of cases including decisions on necessary administrative and disciplinary measures, creating a perception of impunity for wrongdoing.

(5) UNOCI should follow up with investigating bodies as required and include the status of cases in the Misconduct Tracking System.

UNOCI accepted recommendation 5 and stated that CDT was following up open cases with investigating bodies and that updates were recorded in the Misconduct Tracking System. Recommendation 5 remains open pending receipt of evidence that CDT regularly follows up open cases with all relevant investigative bodies.

Need to include individual contractors in training programmes

- 33. The DFS Advisory requires CDT in collaboration with the Integrated Mission Training Centre to ensure that all United Nations personnel, including United Nations consultants and individual contractors, receive induction training and refresher courses on conduct and discipline issues, including prevention of sexual exploitation and abuse.
- 34. A review of training records for the audit period indicated that adequate procedures were in place to ensure induction and refresher trainings were provided to civilian and military/police personnel. However, 713 of the 794 individual contractors hired during the audit period did not attend relevant training on the prevention of sexual exploitation and abuse. This resulted because of inadequate coordination between CDT, the Integrated Mission Training Centre, and the Human Resources Section to ensure that individual contractors were included in the training programme. As a result, there was an increased risk of individual contractors not being aware of expected behaviour, potential negatively impacting on the reputation of the Mission.

(6) UNOCI should take action to include individual contractors in its training programme on the United Nations code of conduct and policy against sexual exploitation and abuse.

UNOCI accepted recommendation 6 and stated that it had made the Mission's induction and the prevention of sexual exploitation/abuse training mandatory for all individual contractors. The Mission added that it started to include individual contractors in the prevention of sexual exploitation and abuse mandatory training in August 2015. Based on the action taken by the Mission and OIOS verification, recommendation 6 has been closed.

Welfare and recreation facilities were adequately provided and functional

- 35. The DFS Advisory requires UNOCI to ensure that adequate welfare and recreation facilities are provided to strengthen the morale and discipline of United Nations personnel. The Advisory requires CDT to monitor the implementation of welfare and recreation facilities and provide advice to recreation committees on the implementation of appropriate welfare activities.
- 36. UNOCI established various welfare and recreational facilities and activities including a gym, indoor and outdoor sports equipment, and internet access for mission personnel. Visits to 12 contingent locations also showed that similar facilities and equipment were available for use by contingent officers. Further, a review of all monthly and quarterly reports on conduct and discipline activities indicated that CDT regularly inspected welfare and recreation facilities and reported their observations and recommendations for improvement to senior management. OIOS concluded that UNOCI had implemented adequate controls to ensure welfare and recreation facilities were provided for peacekeeping personnel.

B. Coordinated management

Offer of assistance to victims of sexual exploitation and abuse needed to be documented

- 37. The DFS Advisory requires CDT to: (a) participate in the network of the United Nations Country Team to implement a victim assistance mechanism as part of the Organization's strategy on remedial actions to address misconduct; and (b) maintain up-to-date mapping of services and assistance (e.g. medical care, legal, psychological and social support) available for victims of sexual exploitation and abuse.
- 38. A review of all minutes of in-country network meetings held during the audit period indicated that UNOCI participated in the in-country network and assisted in the mapping of available services. However, a review of the 79 cases in the Misconduct Tracking System indicated that victims involved in the six sexual exploitation and abuse cases had not received any assistance. CDT indicated that it proposed referral for assistance to the victims; but this was refused due to various reasons, including cultural practices. However, CDT did not maintain a record of its interactions with victims and their decision not to seek assistance. As a result, CDT interventions with victims were not reported to Mission management or the United Nations Country Team for follow-up. This resulted as CDT was of the view that such interactions did not need to be recorded. In the absence of documentary evidence to demonstrate that victim assistance was offered but declined exposed United Nations to reputational risk if UNOCI was unable to provide evidence that victims of sexual exploitation and abuse were being assisted in a reliable and timely manner.
 - (7) UNOCI should implement a process of documenting and maintaining records of interactions with victims of sexual exploitation and abuse to demonstrate that appropriate follow-up and assistance is being offered.

UNOCI accepted recommendation 7 and stated that it would document and maintain adequate records of interactions with victims from April 2015. Recommendation 7 remains open pending receipt of evidence that a process has been established to document and maintain records of interactions with victims of sexual exploitation and abuse, and that appropriate action is taken to provide assistance to the victims.

IV. ACKNOWLEDGEMENT

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

(Signed) David Kanja Assistant Secretary-General, Acting Head Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

Recom.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
1	UNOCI should allocate adequate resources to develop a public information strategy and action plan to create awareness among the local population on expected conduct of United Nations personnel and the mechanisms for reporting complaints.	Important	С	Action taken.	Implemented
2	UNOCI should assign police officers to the Conduct and Discipline Team to ensure that conduct and discipline matters affecting police personnel in the Mission are coordinated, assessed and monitored effectively by the Conduct and Discipline Team.	Critical	С	Action taken.	Implemented
3	UNOCI should: (a) arrange for DFS to provide further instructions and training to the Conduct and Discipline Team on the development of a risk assessment framework; and (b) develop and implement a schedule to visit all Mission locations annually to ensure adequate assessment of risk and implementation of preventive measures.	Important	С	Action taken.	Implemented
4	UNOCI should document all decisions to close misconduct allegations and submit them to the Head of Mission for approval prior to the case being closed in the Misconduct Tracking System.	Important	С	Action taken.	Implemented
5	UNOCI should follow up with investigating bodies as required and include the status of cases in the Misconduct Tracking System.	Important	О	Receipt of evidence that CDT regularly follows up open cases with investigating bodies and records the status of these cases in the	October 2015

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¹ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² Important recommendations address important (but not critical or pervasive) deficiencies 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.

 $^{^{3}}$ C = closed, O = open

⁴ Date provided by UNOCI in response to recommendations.

STATUS OF AUDIT RECOMMENDATIONS

Recom.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
				Misconduct Tracking System.	
6	UNOCI should take action and include individual contractors in its training programme on the United Nations code of conduct and policy against sexual exploitation and abuse.	Important	С	Action taken.	Implemented
7	UNOCI should implement a process of documenting and maintaining records of interactions with victims of sexual exploitation and abuse to demonstrate that appropriate follow-up and assistance is being offered.	Important	Ο	Receipt of evidence that a process has been established to document and maintain records of interactions with victims of sexual exploitation and abuse.	October 2015

APPENDIX I

Management Response

NATIONS UNIES

Opération des Nations Unies en Côte d'Ivoire



UNITED NATIONS

United Nation Operation in Côte d'Ivoire

MEMORANDUM INTERIEUR

INTEROFFICE MEMORANDUM

To:

Eleanor T. Burns, Director

Internal Audit Division, OIOS

Date:

12 October 2015

From:

Ms. Aïchatou Mindaoudou

SRSG

Your reference: IAD: 15-640-14

Subject:

Draft report on an audit of the conduct and discipline function in the United nations Operation in Côte d'Ivoire

- 1. I refer to your inter-office memorandum dated 16 September 2015 ("the memorandum"), by which you submitted a "draft report on an OIOS audit of the conduct and discipline function in the United Nations Operation in Côte d'Ivoire" ("the draft audit report") for my review and comments.
- 2. In your memorandum, you pointed out that the "[o]verall results relating to effective management of the conduct and discipline function in the United Nations Operation in Côte d'Ivoire were unsatisfactory." The OIOS audit was conducted between November 2014 and March 2015 and covered the period from 2013 to 2014.
- 3. Your memorandum followed your letter of 25 June 2015 ("the letter"), by which you forwarded "detailed results of [the] audit on the conduct and discipline function in [UNOCI]" ("the audit results)" to UNOCI senior management. In that letter, you requested comments on the audit results by 9 July 2015, including a "confirmation of factual accuracy".
- 4. In an email of 9 July 2015, the new Chief of UNOCI's Conduct and Discipline Team (CDT) responded to the letter on behalf of UNOCI senior management. Following a review of the audit results, factual errors in the audit results were noted, on the basis of which the aforementioned rating of "unsatisfactory" seemed to be unjustified. The errors were listed in a table, which was attached to the message of 9 July 2015. On the same day, in an email sent to CDT, the assigned OIOS auditor acknowledged "factual inaccuracies" in the audit results.
- 5. We note that some of the errors of the audit results were corrected in the draft audit report. The findings in the draft audit report, however, still contain errors. In paragraph 17 of the draft audit report for example, it is stated that the mission "did not conduct any (...) outreach/awareness raising activity for the host population," other than a mission UN day celebration campaign in November 2014. This is incorrect, as indicated in the response of 9 July 2015, which included data showing that outreach activities had taken place throughout the period in question, namely in 2013 and 2014. In paragraph 32, the auditors referred to a risk assessment framework, which was purportedly part of DFS Advisory, although we clarified in the response of 9 July 2015 that the latter document does not include such framework.
- 6. Nevertheless, without prejudice to the above, the mission accepted the audit recommendations made in the audit results/the draft audit report, noting that they

reiterate existing requirements and are to be distinguished from the contested factual conclusions. In other words, the audit recommendations seemed to be appropriate, irrespective of the audit findings. The mission has thus implemented all audit recommendations, as per the attached management response table.

cc: Asenaca Colawai, acting CoS

Management Response

Rec.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	UNOCI should allocate adequate resources to develop a public information strategy and action plan to create awareness among the local population on expected conduct of United Nations personnel and the mechanisms for reporting complaints.	Important	Yes	Chief Conduct and Discipline Officer and Officer in- Charge, Public Information Office	Implemented September 2015	An external and an internal communication strategy were approved by the Head of Mission in "September "2015 and guide the mission's outreach activities. Supporting documents have been provided to OIOS.
2	UNOCI should assign police officers to the Conduct and Discipline Team to ensure that conduct and discipline matters affecting police personnel in the Mission are coordinated, assessed and monitored effectively by the Conduct and Discipline Team.	Critical	Yes	SRSG/Police Commissioner	Implemented on 8 September 2015.	On 15 July 2015, the SRSG decided to assign a UN Police Officer to the Conduct and Discipline Team ("CDT") to ensure that conduct and discipline matters affecting police personnel in the mission are coordinated, assessed and monitored effectively by CDT. The selected UNPOL Officer commenced his service with CDT on 8 September 2015. Supporting documents have been provided to OIOS.
3	UNOCI should: (a) arrange for DFS to provide further instructions and training to the Conduct and Discipline Team on the development of a risk assessment framework; and (b) develop and implement a schedule to visit all Mission	Important	Yes	Conduct and Discipline Officer	Implemented	(a) A message requesting assistance and training on how to develop a risk assessment framework was sent to DFS on 21 July 2015. (b) Based on the information received from DFS, the mission has

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 (but not critical or pervasive) 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

Rec.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	locations annually to ensure adequate assessment of risk and implementation of preventive measures.					developed a table showing all UNOCI military contingents serving in the mission area, their camp locations and deployment dates. The table serves to coordinate CDT's visits of UNOCI military camps ensuring proper risk assessment. In this connection, all military camps have been visited since May 2015. Supporting documents have been provided to OIOS.
4	UNOCI should document all decisions to close misconduct allegations and submit them to the Head of Mission for approval prior to the case being closed in the Misconduct Tracking System.	Important	Yes	Conduct and Discipline Officer	Implemented since March 2015	All decisions to close cases involving allegations of misconduct have been approved by the Head of Mission in writing since March 2015. Supporting documents have been provided to OIOS.
5	UNOCI should follow up with investigating bodies as required and include the status of cases in the Misconduct Tracking System.	Important	Yes	Conduct and Discipline Officer	Implemented	CDT is following up with investigating bodies on open investigations. Updates are recorded on MTS. Supporting documents have been provided to OIOS.
6	UNOCI should take action and include individual contractors in its training programme on the United Nations code of conduct and policy against sexual exploitation and abuse.	Important	Yes	Chief/Integrated Mission Training Center	Implemented in August 2015	The Head of Mission instructed UNOCI's Integrated Mission Training Center (IMTC) on 5 July 2015 to make the mission's induction and the prevention of sexual exploitation/abuse (PSEA) training mandatory for all individual

Management Response

Rec.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						contractors (ICs). In August 2015, the mission started to include ICs in the PSEA training. Supporting documents have been provided to OIOS.
7	UNOCI should implement a process of documenting and maintaining records of interactions with victims of sexual exploitation and abuse to demonstrate that appropriate follow up and assistance is being offered.	Important	Yes	Conduct and Discipline Officer	Implemented	As victim assistance did not have to be provided in UNOCI since March 2015, the recommendation could not be implemented in the relation to a concrete case. The mission will, however, document and maintain adequate records of interactions with victims from now on.