

INTERNAL AUDIT DIVISION

REPORT 2021/065

Audit of records and archives management at the Office of the United Nations High Commissioner for Refugees

There was a need to enhance efficiency and controls over records and archives management activities

17 December 2021 Assignment No. AR2021-165-01

Audit of records and archives management at the Office of the United Nations High Commissioner for Refugees

EXECUTIVE SUMMARY

The Office of Internal Oversight Services (OIOS) conducted an audit of records and archives management (RAM) at the Office of the United Nations High Commissioner for Refugees (UNHCR). The objective of the audit was to assess the adequacy and effectiveness of RAM in UNHCR. The audit covered the period from 1 January 2020 to 30 June 2021 and included a review of: (a) records management; (b) digital preservation; (c) digitization; and (d) archives management.

UNHCR had developed a comprehensive RAM framework and had made good progress in transitioning to digital business processes and electronic recordkeeping. To further strengthen existing arrangements, UNHCR needed to: review and consolidate the RAM framework; define a roadmap for the roll out of the integrated electronic recordkeeping solution; provide staffing benchmarks and capacitate regional bureaux and divisions with RAM expertise; institutionalize and/or update digital preservation and digitization guidance; and identify a cost-efficient model for archiving individual case files of persons of concern (PoCs).

OIOS made six recommendations. To address issues identified in the audit, UNHCR needed to:

- Review and consolidate its RAM framework, better define stakeholder responsibilities and the role of focal points and provide training where necessary to ensure a more consistent and comprehensive approach to records management;
- Ensure that the Records and Archives Section is assigned a relevant role and access to Office 365 reports, file structures and data so that it can effectively monitor electronic recordkeeping; and define a roadmap for the implementation of the integrated electronic documents/records management solution;
- Develop staffing benchmarks and standard job descriptions for the creation of archivist positions; and in conjunction with regional bureaux, establish the scope of work and reporting lines of outposted positions, as well as capacitate bureaux to support and monitor regional RAM activities;
- Develop and disseminate a digital preservation strategy, policy and operational guidelines;
- Finalize the digital transformation strategy that includes targets for effectiveness and efficiency of business processes, update the operational guidelines for digitization to address gaps inter alia in the budgeting of digitization projects, and stipulate the standard approach for the destruction of paper individual case files of PoCs once digitized; and
- Continue to take an inventory of the remaining undocumented permanent records in the central archives and decide on the future model of archiving of physical individual case files of PoCs informed by cost benefit analyses.

UNHCR accepted the recommendations and had initiated action to implement them.

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Audit of records and archives management at the Office of the United Nations High Commissioner for Refugees

I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of records and archives management (RAM) at the Office of the United Nations High Commissioner for Refugees (UNHCR).

2. UNHCR defines a record as any data or information, regardless of format or medium, created or received by its personnel or systems as evidence of a transaction, decision or communication related to UNHCR work. Records can be transitory, temporary, or permanent. UNHCR archives comprise records that have permanent value, warranting their continued preservation. Effective records management supports UNHCR in: (a) delivering its mandate; (b) transferring knowledge and ensuring proper handover of functions among a high rotational workforce; (c) ensuring business continuity in the event of an emergency or disaster; (d) ensuring data security and confidentiality for the protection of its persons of concern (PoCs); (e) reinforcing accountability and safeguarding against corruption, fraud, and mismanagement; (f) reducing the risks and costs of unmanaged repositories of information; and (g) preserving its institutional memory.

3. The Records and Archives Section (RAS) in the Division of External Relations (DER) is responsible for ensuring the preservation, integrity, authenticity, and accessibility of UNHCR permanent records and monitoring compliance with the Policy on the Management of UNHCR Records and Archives (the RAM Policy)¹ and other guidance. As of April 2021, RAS had 16 positions (11 professional and 5 general service staff) reporting through the Chief of Section (P-5 level) to the DER Director. Following a reorganization of the Section, three positions were transferred from Geneva to three regional bureaux in Southern Africa, Asia and the Pacific and the Americas.

4. Comments provided by UNHCR are incorporated in italics.

II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

5. The objective of the audit was to assess the adequacy and effectiveness of RAM in UNHCR and more specifically in ensuring: (a) relevant records were safely and systematically retained, appraised, curated, and made accessible to support the delivery of UNHCR mandate; (b) the efficiency of business processes; and (c) the preservation of institutional memory.

6. This audit was included in the 2021 risk-based work plan of OIOS due to the importance of RAM in a context of proliferating use of technologies and creation of growing volumes of information through diversified sources, as well as the pressing need for remote and secure access to information during teleworking arrangements entailed by the COVID-19 pandemic.

7. OIOS conducted this audit from June to August 2021. The audit covered the period from 1 January 2020 to 30 June 2021. Based on an activity-level risk assessment, the audit included a review of the following higher and medium risks areas: (a) records management; (b) digital preservation; (c) digitization; and (d) archives management. OIOS will conduct a more in-depth review of data protection and classification in an upcoming assignment on the subject.

8. The audit methodology included: (a) interviews with key personnel at headquarters; (b) review of relevant documentation; (c) analytical reviews of data and systems; (d) sample review of 14 digitization

¹ UNHCR/HCP/2017/4, 1 January 2018.

and digital preservation projects selected using random sampling; (e) inspection of archive centres and recordkeeping in offices in Switzerland and Ukraine; (f) compilation of RAM issues from previous audit reports; and (g) delivery of an audit questionnaire to 27 offices (7 headquarters divisions, 7 regional bureaux, 3 multi-country offices and 10 country operations)² for which there was a 96 per cent response rate and 37 responses received for analysis.

9. The audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.

III. AUDIT RESULTS

A. Records management

Need to review and consolidate the RAM framework

10. UNHCR issued its current RAM Policy in 2017, which together with several auxiliary guides constituted the RAM framework. The framework requires UNHCR offices to: (a) establish recordkeeping systems, guided by office file plans defined according to standard classifications of the UNHCR Master File Plan; (b) conduct appraisals of records at least every five years; (c) destroy temporary records after expiry of retention periods defined in the UNHCR Summary of Records Schedules and document the process; (d) transfer permanent records to the central archives in Geneva that are at least 20 years old, before an office closes or when no longer needed by the office; (e) ensure security and protection of records; (f) develop standard operating procedures (SOPs) for recordkeeping; and (g) designate focal points responsible for managing recordkeeping, advising and training staff and liaising with RAS. The UNHCR Emergency Handbook requires offices to identify vital records and create evacuation plans for those records.

11. Feedback received from the audit questionnaire and presented in Figure 1 showed a low level of adherence to the requirements of the RAM framework.

Figure 1: Summarized audit questionnaire results



12. Among the offices that responded to the survey and provided supporting evidence, OIOS noted that:

² **Divisions**: Human Resources; Emergency, Security and Supply; Resilience and Solutions; International Protection; Strategic Planning and Results; Information Systems and Telecommunications; and Financial and Administrative Management; **Regional Bureaux**: East and Horn of Africa & Great Lakes; Southern Africa; West and Central Africa; Americas; Asia & the Pacific; Europe; and Middle East & North Africa; **Multi-Country Offices**: Senegal; Panama; and Hungary; **Representations**: Kenya; Somalia; Malawi; Nigeria; Colombia; Malaysia; Ukraine; Syria; and Tunisia; **Missions**: India

- a. When office file plans were in place, they often did not cover all types of records. Specifically, file plans covered either paper or electronic records stored in e-SAFE (UNHCR electronic records management system managed by RAS) and excluded a significant part of records maintained in other systems (e.g., Microsoft 365 collaborative tools, local network drives, and the Managing for Systems, Resources and People or MSRP, the UNHCR enterprise resource planning system).
- b. Focal points were not designated for RAM activities, except in three regional bureaux (Americas, Southern Africa and West and Central Africa) and the UNHCR Representation in Colombia.
- c. Offices confirmed that security and protection of records was ensured through restricting access and in some cases implementing file tracking systems for individual case files of PoCs. For the two rooms physically checked by OIOS, access controls were operational and effective.
- d. Offices were unable to provide business continuity plans, which would have confirmed whether vital records had been identified and evacuation plans were in place in case of an emergency. Only two plans reviewed from an additional 12 offices³ had adequately defined these provisions (Jordan and Yemen), and two others (Afghanistan and Brazil) had partially defined them.

13. OIOS' review of electronic recordkeeping in 60 e-SAFE folders showed instances of inadequate use of naming conventions and document control standards (i.e., preparation, review, approval, release, and distribution of documents), the latter due to lack of guidance. These issues, potentially replicated in other systems, adversely impacted effective retrieval and verification of authenticity of records.

14. Taking into consideration the above, the framework needed to be updated to: (a) focus on electronic recordkeeping, which is essential due to the introduction of new platforms for managing and storing information; (b) clarify preferred formats for creating and archiving documents (paper versus electronic); and (c) clarify roles and responsibilities of relevant stakeholders other than RAS. The current RAM guidance, spread over at least 20 documents, should be consolidated and outdated procedures replaced by UNHCR newer practices. When updating the RAM framework, UNHCR also needs to consider adopting good practices such as: (a) the identification of vital records, as outlined in United Nations Archives and Records Management Section Guidance⁴; and (b) establishment of an information management governance framework, i.e., a holistic overview that informs how an organization creates and manages its information assets (records, information, and data), contributes to risk mitigation, and maximizes the value of information.⁵

15. The need for refresher training focusing on new RAM approaches was also referred by most respondents to the audit questionnaire. Once the framework is updated, RAS should provide training on the new RAM guidelines and share best practices to ensure a more consistent UNHCR-wide approach.

(1) The UNHCR Division of External Relations should: (a) review and consolidate its records and archives management framework and adopt a more holistic approach to information governance, as well as better define stakeholder responsibilities and the role of focal points; and (b) provide training to ensure a consistent and comprehensive approach to records management once the framework is promulgated.

UNHCR accepted recommendation 1 and stated that RAS would review and consolidate the RAM framework into a RAM strategy, revise the RAM Policy, and issue a new Administrative Instruction (AI), which would include results-based management indicators. These would support a holistic

³ Representations in Central African Republic, Afghanistan, Bangladesh, Brazil, Republic of the Congo, Democratic Republic of the Congo, Equator, Jordan, Rwanda, Nigeria, Ukraine, and Yemen.

⁴ <u>United Nations Archives and Records Management Section Guidance # 3</u>

⁵ Materials published by the National Archives of Australia

approach to information governance and operational commitment through measurable outputs and resources. Within the Digital Transformation Programme, an increased number of RAM focal points and regional archivists would play an empowered role in coordinating RAM activities directly with headquarters. RAS would also continue to enhance its current training. Recommendation 1 remains open pending receipt of: (a) the RAM global strategy, revised Policy and new AI addressing the gaps reported; and (b) evidence of delivery of training on the revised RAM framework.

<u>Need to better monitor electronic recordkeeping, communicate details of the integration between electronic</u> <u>documents/records management systems, and define a roadmap for the roll out of the integrated solution</u>

16. UNHCR's initial electronic documents and records management system, e-SAFE, was implemented in about 90 offices/locations/units since early 2000. However, from March 2020 to July 2021 the use of e-SAFE decreased by approximately 44 per cent.⁶ This was because offices used other systems, such as Office 365 tools (e.g., SharePoint, Teams and OneDrive). For comparison purposes, in August 2021 there was 45 terabytes of data usage in SharePoint and 27 terabytes in e-SAFE. Also, the folder structure in e-SAFE did not reflect the UNHCR organizational structure and 76 per cent of the respondents to the audit questionnaire informed that only a few functions in their offices actively used the system. This was because e-SAFE was not considered user-friendly by respondents when compared with Office 365 tools.

17. Despite RAS efforts to promote its use, the roll out of e-SAFE was disrupted after implementation of Office 365. An external study dated March 2020 recommended the use of Office 365 tools as the preferred electronic documents management system⁷ and the use of e-SAFE as the electronic records management system.⁸ Subsequently, in November 2020, there was an all-staff communication informing that e-SAFE and Office 365 would be integrated in 2021. In the interim, offices using e-SAFE were instructed to continue doing so, and others to organize their records in Office 365. The communication contained high-level RAS guidance on responsibilities for recordkeeping in Office 365 and instructions on the adoption of simplified file structures. In April 2020, and before the referred all-staff communication, the Division of Information Systems and Telecommunications (DIST) issued user guides on Office 365 tools and on how users could submit requests for the creation of new "teams/library folders" through the Global Service Desk. Such requests were approved by DIST, who assessed the high-level business need and existence of duplication. RAS did not have a role in this process, unlike with e-SAFE.

18. Further, most offices surveyed reported that more information was required regarding the expected integration, such as what records to keep in each system and how to avoid duplication. The integration was meanwhile completed during the audit, but dissemination of information in the Organization on the details and impact of such integration was missing. The absence of such information, as well as lack of involvement of RAS in the implementation of Office 365 tools could potentially compromise consistent and effective records management in UNHCR.

(2) The UNHCR Division of External Relations should: (a) jointly with the Division of Information Systems and Telecommunications ensure that the Records and Archives Section is assigned a relevant role and access to Office 365 reports, file structures and data so that it can effectively monitor electronic recordkeeping; (b) communicate the developments and impact of e-SAFE and Office 365 integration within the Organization; and (c) define a roadmap for the implementation of the integrated electronic documents/records management solution.

⁶ Measured in terms of number of new documents and versions added (source: RAS e-SAFE statistics).

 ⁷ EDMS: controls and organizes documents, whether declared as records or not. It typically includes: document and content creation, document and content capture, document and content editing and revision, image processing, and document workflow/business process management.
 ⁸ ERMS: allows an organization to assign a specific life cycle to individual pieces of organizational information. Does not allow editing and

⁸ ERMS: allows an organization to assign a specific life cycle to individual pieces of organizational information. Does not allow editing and document review and typically receives records for storage and manages its disposition.

UNHCR accepted recommendation 2 and stated that: (a) DER would pursue collaboration with DIST to ensure RAS has the right level of access to oversee use of Office 365 and support a holistic application of the RAM guidance; (b) RAS would aim at communicating sufficiently the impact of e-SAFE and Office 365 integration to enhance business continuity; and (c) e-SAFE and Office 365 are now integrated, and roadmap for the rollout of an integrated record keeping solution will be considered. Recommendation 2 remains open pending receipt of: (a) evidence that RAS was assigned relevant access to Office 365 and of processes implemented to monitor records management therein; (b) examples of communications on the details/impact of e-SAFE and Office 365 integration; and (c) the roadmap for the implementation of the integrated electronic documents/records management solution.

Need to define staffing benchmarks and standard job descriptions for archivist positions and coordinate with regional bureaux and divisions for support and monitoring of RAM in the regions

19. Archives and records management expertise was concentrated in RAS. Organization-wide, there were 14 other staff with non-standard job titles that included in their description "archive", "filing" or "recordkeeping" (staff from G-3 to G-5 levels). These staff worked in seven country operations⁹, and were not all exclusively performing the tasks inferred from their job titles. Six offices noted that to ensure full compliance with the RAM Policy, dedicated expert resources were needed. OIOS is of the opinion that such positions could be created, but after an objective needs assessment is conducted and criteria (e.g., size of the operations to determine staffing levels and standard job descriptions) established. Both headquarters divisions and regional bureaux should also play an active role in supporting and monitoring RAM activities once they are fully capacitated, which is in line with their support and oversight responsibilities reinforced post-decentralization, it will also complement RAS limited capacity, and contribute to enhanced sustainability of RAM.

20. DER had taken steps to enhance the capacity of regional bureaux in RAM. RAS had, since April 2021, outposted three of its professional positions (two P-3s and one P-2) to three regions, specifically Southern Africa, Asia and the Pacific and the Americas. These positions were not fully operational at the time of the audit. Moreover, the outposted staff would possibly face challenges in the discharge of their responsibilities, since their job descriptions were unclear regarding their positioning in the structures of the respective regional bureaux and/or DER, reporting lines, and scope of work. There were also four other regions where UNHCR works without relevant staff that needed to be capacitated.

(3) The UNHCR Division of External Relations should: (a) develop staffing benchmarks and standard job descriptions for the creation of archivist positions and advocate for the creation of such positions where needed; and (b) in coordination with regional bureaux, establish the scope of work and reporting lines of outposted archivists, and capacitate bureaux to support and monitor regional records and archives management activities.

UNHCR accepted recommendation 3 and stated that: (a) RAS would provide job descriptions/terms of reference for RAM positions, clarify the scope of work and reporting lines of outposted archivists, and support delivery of RAM responsibilities by regional bureaux; and (b) DER would actively respond to the needs identified in the field and advocate for the creation of more positions/evaluation of existing positions to provide sufficient RAM capacity. Recommendation 3 remains open pending receipt of evidence that: (a) staffing benchmarks and standard job descriptions for archivist positions have been established and support provided for the creation of such positions if needed; and (b) plans are in place to capacitate regional bureaux.

⁹ Representations in Kenya, South Sudan, Turkey, Jordan, Lebanon, Syria, and Malaysia (source: UNHCR staffing table 11 March 2021)

B. Digital preservation

Need to develop a digital preservation strategy and other guidance

21. Digital preservation is the process of identification and capture of records created in digital form, which are spread in diverse and numerous sources (e.g., websites, data portals, social media accounts) and their preservation in trusted repositories to ensure continued access. Ongoing technological advances and the fragility of/rapidly changing digital contents require preservation to be done much earlier in the lifecycle of these records, and at a much greater frequency.

22. RAS had invested in digital preservation systems compliant with International Organization for Standardization standards to ensure long term preservation of digital records, and undertook periodic identification, based on its initiative or at the request of UNHCR offices, of digital contents for capture and preservation. As at April 2021, UNHCR web archive systems had captured around 150 websites and social media accounts (6 terabytes of data). In addition, UNHCR digital preservation system had captured 62 terabytes of data and metadata.¹⁰

23. RAS maintained an Excel spreadsheet with an inventory of some of the contents that had been preserved or were in the pipeline for preservation. These were assessed by the Senior Archivist (Digital Preservation) against valid criteria such as: location, risk of loss, technical difficulty, impact of loss and operational and historical value. Each digital content was assigned a priority, but there was no underlying prioritization methodology to support the priority levels assigned. Also, the associated costs of digital preservation were not considered in the assessment. This was necessary considering RAS concerns about the financial sustainability of digital preservation.

24. Eight respondents to the audit questionnaire noted that they had captured digital contents (e.g., videos, photos, press releases, interviews, newspaper articles, web stories, statistics, social media accounts) and had stored them in repositories such as: external hard drives, SharePoint, local network shared drives, OneDrive, Google Drive, Trello Boards, and e-SAFE. Some of these systems may be inadequate for long term digital preservation, and their usage may result in the loss of records.

25. There was no formal framework (strategy, policy, and procedures) defined to raise awareness and achieve consistency in the management and active preservation of digital records, especially for offices without technical expertise and resources. In addition to providing objective criteria for the identification, prioritization, selection and endorsement of contents for digital preservation, the guidance should define: (a) a formal method of accepting records, including standards for file formats and metadata; (b) a secure process for transferring records into storage and managing them appropriately; (c) mapping processes to capture metadata into a searchable database linked to the records so that they can be located; (d) formal means of providing the content of the preserved records to users in the most appropriate format; (e) a system for monitoring the preservation activities that can produce usable audit data; and (f) alignment with the RAM Policy/overall RAM framework.¹¹

(4) The UNHCR Division of External Relations should develop a digital preservation strategy, policy, and operational guidelines as part of a global records and archives management framework.

UNHCR accepted recommendation 4 and stated that RAS would formalize the existing digital preservation framework into a digital preservation strategy and update the RAM operational guidance, with due regard to the fast-evolving nature of digital preservation and operational flexibility.

¹⁰ Data fields that describe information such as the context, content and structure of records and their management through time.

¹¹ National Archives of the United Kingdom, Digital Preservation Strategy and Policy

Recommendation 4 remains open pending receipt of the digital preservation guidance developed and disseminated across UNHCR.

C. Digitization

Need to develop and disseminate a digitization/digital transformation strategy

26. Digitization is the process of creating digital representations of physical records and/or their attributes. The UNHCR Guidelines for Digitization¹² require offices to: (a) make digitization decisions based on an analysis of risks, benefits, and costs and be guided by a clear strategy that results in the production of complete and usable digital contents; (b) plan and manage digitization initiatives as projects; and (c) submit a checklist or a project plan to RAS prior to starting a project.

27. RAS was involved in 12 digitization projects implemented in field locations, targeting mostly individual case files of PoCs. OIOS reviewed 7 projects (58 per cent) and noted that RAS was diligently supporting the respective offices. This support included: (a) review of project plans; (b) guidance on naming conventions of records, metadata, and file structures; (c) setting up file structures, granting accesses in e-SAFE and training users; and (d) random quality checks on digitized files. Offices proactively identified digitization opportunities and benefits such as savings in storage space and in costs of transferring files to Geneva. Other aspects included increased security in the access to data of PoCs, and enhanced efficiency of business processes due to improved access to files in digital format. However, OIOS identified several digitization initiatives in UNHCR (e.g., several offices going paperless),¹³ which were not formalized as digitization projects. These initiatives did not involve RAS and key RAM principles could have been overlooked.

28. RAS was generally opposed to destroying paper files after digitization and consequently, hardcopy files were retained in respective field offices or transferred to the archives in Geneva. Transfers were costly and had to be covered by field offices. For instance, in 2013 it costed around \$100,000 for one transfer of 17,000 files by the Representation in Syria, and because of this high cost, transfers were limited thereafter. Storage costs in Geneva were also high. Therefore, the transfer of files to Geneva was put on hold from 2018. However, the practice of retaining physical records after being digitized was inefficient and meant that two parallel recordkeeping systems were being maintained. RAS explained that physical files could be destroyed if there was reasonable assurance that complete and high-quality master copies were stored in trusted digital repositories that ensured their long-term preservation. Nonetheless, RAS informed that despite the support it provided, adequate digitization standards were not always followed, thereby increasing the risk of loss of records.

29. Further, the review of digitization projects noted that cost-benefit analyses and project budgets did not include costs of long-term preservation of digital records vis-a-vis the costs of managing paper files (storage, conservation, filing, retrieval, transfers to Geneva). The former could be provided by RAS based on standard costs, as e-SAFE was normally used to store digitized files. Storage, conservation, and retrieval costs of files in Geneva could also be provided by RAS, while offices could provide this information for locally maintained files.

30. Due to technical or resource restrictions in the field, the Guidelines for Digitization recommend the creation of broadly used archive approved formats for easy access/work purposes. This is not in accordance with the "Scan once for all purposes" approach prescribed by the Guidelines. It therefore translates into a short-term solution, as digitized files will not have long-term archival value due to lower standards in the

¹² UNHCR/OG/2015/1, 28 January 2015

¹³ The following offices implemented specific digitization initiatives: DIST, the Human Resources Staff Services within the Division of Human Resources, the Division of Strategic Planning and Results, and the Supply Management Service within the Division of Emergency, Security and Supply (ongoing). The Mission in India got an award in 2019 for the volume of records it uploaded in e-SAFE.

quality/resolution of digitized copies. For cost efficiency, in OIOS opinion, this recommendation should not be applied to records of permanent value, except if adequately justified in project plans.

31. UNHCR incurs significant Organization-wide costs in printing/publications and had spent about \$8.9 million from January 2020 to 30 June 2021. Costs related to this could be reduced if more publications become available only in digital form, which would also be a step in the positive direction of reducing the environmental impact related to the use of paper. UNHCR does not have a "green policy", however, OIOS noted from the offices surveyed that many of them were introducing environmentally friendly measures such as reduced number of printers, two-sided printing, and monitoring consumption of printing services.

32. The issues referred above arose because UNHCR did not have an overall strategy for digitization with clear targets and approaches to tackle these aspects coherently and consistently. DER informed OIOS that a digital transformation strategy was being finalized.

(5) The UNHCR Division of External Relations should: (a) finalize the digital transformation strategy that includes targets for effectiveness and efficiency of business processes and for the potential reduction of UNHCR environmental footprint; and (b) update the operational guidelines for digitization to address inter alia gaps in the budgeting of digitization projects and stipulate the standard approach for the destruction of paper individual case files of persons of concern once digitized.

UNHCR accepted recommendation 5 and stated that: (a) RAS had provided comments to the draft digital transformation strategy, but while it agreed with the positive impact of digitization in cost savings and efficiency of business processes, it believed the impact on climate change would be minimal; and (b) DER would advocate for a UNHCR-wide solution concerning the destruction of paper files. A structured, and continuous support from other divisions and regional bureaux was essential for a UNHCR-wide solution. Recommendation 5 remains open pending receipt of the published: (a) digital transformation strategy, with adequate references to digitization; and (b) updated operational guidance on digitization addressing the gaps reported and stating the standard approach for the destruction of paper individual case files of PoCs once digitized.

D. Archives management

Need to take an inventory of undocumented records in the central archives, and conduct cost-benefit analyses of decentralizing archives and digitizing physical individual case files of PoCs

33. The UNHCR central archives, within its office premises in Geneva, extended to 10 km of shelves, comprising permanent and temporary records. There was an unknown portion of undocumented permanent physical and non-physical records located in this center (but estimated by RAS at approximately 20 per cent of the total number of records). Lack of a precise inventory impacted RAS ability to identify relations between different sets of records (fonds), define organic groups of records (collections), prioritize and plan for their description¹⁴, and eventually make them available for public consultation. RAS explained that the undocumented records related to the large and disorganized transfers of files received from different offices in the 1990s. RAS had documented detailed metadata for most records over 20 years old, but for some they only knew which office the files came from and the periods they covered.

34. UNHCR maintained 4 km of shelves with around 9,000 boxes containing closed individual case files of PoCs, supported by inventories, in a rented off-site warehouse in Geneva. RAS did not know the volume of permanent records kept by UNHCR offices world-wide that, according to the RAM Policy,

¹⁴ The process of capturing, analyzing, organizing, and recording information to identify, manage, locate, and explain archival materials and the context of records.

would eventually have to be transferred to the central repositories in Geneva. Also, as previously reported, storage costs were escalated by transfer costs being borne by the respective offices, which was a disincentive for transferring files. RAS informed that it had considered alternative storage options. Nonetheless, no concrete steps had been taken towards the implementation of an alternative cost-effective solution.

35. OIOS compared file storage costs in Geneva and Bangkok (services hired by the Regional Bureau for Asia and the Pacific), and noted that storing 9,000 boxes in Bangkok would be considerably cheaper (538 per cent) than in Geneva. The storage costs in Bangkok were also all inclusive (cardboard bar-coded boxes, monthly storage charges, unlimited retrieval/refile and destruction, unlimited transportation within the city, insurance coverage and secure facilities). In Geneva, most of these services came at an additional cost to UNHCR. The Regional Bureau for Asia and the Pacific informed that the same vendor was used by other UNHCR offices and other United Nations organizations based in Bangkok.

(6) The UNHCR Division of External Relations should: (a) continue its progress in taking an inventory of the remaining undocumented permanent records stored in the central archives; and (b) conduct cost benefit analyses on the establishment of records centres in different regions to store closed individual case files of persons of concern and/or of their digitization.

UNHCR accepted recommendation 6 and stated that: (a) eliminating the backlog of undocumented and under documented records held in the central archives, including establishing catalogues, was part of a plan running until 2024; and (b) Regional Archivists would work with the regional bureaux to estimate the number of and appraise individual case files existent in the regions, identify suitable storage facilities, and conduct cost analyses. A pilot would be conducted in the Southern Africa region. Further, predictable and sustainable support across UNHCR was required to implement the recommendation. Recommendation 6 remains open pending receipt of: (a) evidence of relevant steps taken to eliminate the backlogs in documentation of records in the central archives; and (b) cost analyses conducted, and evidence of concrete steps taken towards a decision on the future model for archiving of individual case files of PoCs.

IV. ACKNOWLEDGEMENT

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

(Signed) Eleanor T. Burns Director, Internal Audit Division Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

Audit of records and archives management at the Office of the United Nations High Commissioner for Refugees

Rec. no.	Recommendation	Critical ¹⁵ / Important ¹⁶	C/ O ¹⁷	Actions needed to close recommendation	Implementation date ¹⁸
1	The UNHCR Division of External Relations should: (a) review and consolidate its records and archives management framework and adopt a more holistic approach to information governance, as well as better define stakeholder responsibilities and the role of focal points; and (b) provide training to ensure a consistent and comprehensive approach to records management once the framework is promulgated.	Important		Receipt of evidence of: (a) the RAM global strategy, revised Policy and new AI addressing the gaps reported; and (b) evidence of delivery of training on the revised RAM framework.	31 December 2022
2	The UNHCR Division of External Relations should: (a) jointly with the Division of Information Systems and Telecommunications ensure that the Records and Archives Section is assigned a relevant role and access to Office 365 reports, file structures and data so that it can effectively monitor electronic recordkeeping; (b) communicate the developments and impact of e-SAFE and Office 365 integration within the Organization; and (c) define a roadmap for the implementation of the integrated electronic documents/records management solution.	Important	0	Receipt of evidence of: (a) evidence that RAS was assigned relevant access to Office 365 and of processes implemented to monitor records management therein; (b) examples of communications on the details/impact of e-SAFE and Office 365 integration; and (c) the roadmap for the implementation of the integrated electronic documents/records management solution.	30 June 2022
3	The UNHCR Division of External Relations should: (a) develop staffing benchmarks and standard job descriptions for the creation of archivist positions and advocate for the creation of such positions where needed; and (b) in coordination with regional bureaux, establish the scope of work and reporting lines of outposted archivists, and capacitate bureaux to support and monitor regional records and archives management activities.	Important	Ο	Receipt of evidence of: (a) staffing benchmarks and standard job descriptions for archivist positions have been established and support provided for the creation of such positions if needed; and (b) plans are in place to capacitate regional bureaux.	31 December 2022

¹⁵ Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.
¹⁶ Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.
¹⁷ Please note the value C denotes closed recommendations whereas O refers to open recommendations.

¹⁸ Date provided by UNHCR in response to recommendations.

STATUS OF AUDIT RECOMMENDATIONS

Audit of records and archives management at the Office of the United Nations High Commissioner for Refugees

Rec. no.	Recommendation	Critical ¹⁵ / Important ¹⁶	C/ O ¹⁷	Actions needed to close recommendation	Implementation date ¹⁸
4	The UNHCR Division of External Relations should develop a digital preservation strategy, policy, and operational guidelines as part of a global records and archives management framework.	Important	0	Receipt of evidence of copies of the digital preservation guidance developed and disseminated across UNHCR.	31 December 2022
5	The UNHCR Division of External Relations should: (a) finalize the digital transformation strategy that includes targets for effectiveness and efficiency of business processes and for the potential reduction of UNHCR environmental footprint; and (b) update the operational guidelines for digitization to address inter alia gaps in the budgeting of digitization projects and stipulate the standard approach for the destruction of paper individual case files of persons of concern once digitized.	Important	0	Receipt of evidence of the published: (a) digital transformation strategy, with adequate references to digitization; and (b) updated operational guidance on digitization addressing the gaps reported and stating the standard approach for the destruction of paper individual case files of PoCs once digitized.	31 December 2022
6	The UNHCR Division of External Relations should: (a) continue its progress in taking an inventory of the remaining undocumented permanent records stored in the central archives; and (b) conduct cost benefit analyses on the establishment of records centres in different regions to store closed individual case files of persons of concern and/or of their digitization.	Important	0	Receipt of evidence of: (a) evidence of relevant steps taken to eliminate the backlogs in documentation of records in the central archives; and (b) cost analyses conducted, and evidence of concrete steps taken towards a decision on the future model for archiving of individual case files of PoCs.	31 December 2025

APPENDIX I

Management Response

Management Response

Audit of records and archives management at the Office of the United Nations High Commissioner for Refugees

Rec. no.	Recommendation	Critical ^{19/} Important ²⁰	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	The UNHCR Division of External Relations should: (a) review and consolidate its records and archives management framework and adopt a more holistic approach to information governance, as well as better define stakeholder responsibilities and the role of focal points; and (b) provide training to ensure a consistent and comprehensive approach to records management once the framework is promulgated.	Important	Yes	(a) Chief of RAS (b) Senior archivist (Records management)	 (a) March 2022 (b) December 2022 	UNHCR accepts this recommendation. DER is aware of the importance of a holistic approach of all stakeholders, both bureaux and operations, in rolling out the RAM globally and considering the ongoing regionalization. The updated RAM guidance should be readily available, while the assignment of focal points and training will be enhanced proportionate to the growing needs. Training on the new RAM framework must also be proactively communicated. (a) 1. Indicator: RAS will review and consolidate its records and archives management (RAM), including drafting COMPASS/RBM indicators that would support the holistic approach of RAM for information governance in operations that ensure operational commitment through measurable outputs and resources. For the Digital Centre of Excellence, as part of the Digital Transformation Programme, an enhanced number of RAM focal points and regional archivists will play an empowered role in coordinating RAM directly with the HQ.

¹⁹ Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization. ²⁰ Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

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2	The UNHCR Division of External	Important	Yes	(a) Director of	(a) Ongoing	 (a) 2. Policy: Review and revise the existing UNHCR/HCP/2017/4 policy and create a new AI. (a) 3. RAS will develop and publish a Records and Archives Strategy that shares a vision, goal, approaches, strategic and desired results of the new framework. (b) RAS will continue and enhance its current training. UNHCR accepts this
	Relations should: (a) jointly with the Division of Information Systems and Telecommunications ensure that the Records and Archives Section is assigned a relevant role and access to Office 365 reports, file structures and data so that it can effectively monitor electronic recordkeeping; (b) communicate the developments and impact of e-SAFE and Office 365 integration within the Organization; and (c) define a roadmap for the implementation of the integrated electronic documents/records management solution.			DER (b) Senior archivist (Records management) (c) Senior archivist (Records management)	(b) Ongoing (c) June 2022	 recommendation. With the current working arrangement, RAS does not have the required access and oversight in Office 365. This arrangement compromises effective and meaningful records and archives management of the Office 365/ e-SAFE integration that should allow efficient RAM practice. Therefore, (a) DER will work towards a collaborative working relationship between RAS and DIST that ensure RAS has the right level of access to discharge its oversight role in Office 365 that supports a holistic and better application of the RAM guidance in UNHCR. (b) RAS will work with the internal communication structures to ensure that the impact of e-SAFE and Office

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						 365 integration is communicated sufficiently to colleagues and corporate structures to enhance business continuity, while its success depends on (a) and (c). (c) Of note is the fact that e-SAFE is now integrated with O365 and no longer a standalone. The roadmap therefore will not be for the roll out of e-SAFE but for the rollout of a record keeping solution that includes O365 and e-SAFE.
3	The UNHCR Division of External Relations should: (a) develop staffing benchmarks and standard job descriptions for the creation of archivist positions and advocate for the creation of such positions where needed; and (b) in coordination with regional bureaux, establish the scope of work and reporting lines of outposted archivists, and capacitate bureaux to support and monitor regional records and archives management activities.	Important	Yes	(a) Chief of RAS (b) Director of DER	(a) December 2022 (b) Ongoing	UNHCR accepts this recommendation. DER is aware that substantial resources are needed to support the roll-out of UNHCR's Records and Archives Strategy, Digital Preservation Strategy, RAM guidelines, Digital Transformation Strategy and global governance against a backdrop of regionalization. (a) RAS will provide Job descriptions and ToRs for RAM positions and advice on relevant resources and services that support establishing the scope of work, clarifies reporting lines of outposted archivists, and guidance to ensure that all regional bureaus can deliver their RAM responsibilities (b) DER will actively respond to the
						needs identified in the field and advocate for the creation of more

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						positions/ evaluation of existing positions to provide RAM sufficient capacity to prop up the regions and divisions.
4	The UNHCR Division of External Relations should develop a digital preservation strategy, policy, and operational guidelines as part of a global records and archives management framework.	Important	Yes	Senior Archivist (Digital Preservation)	December 2022	 UNHCR accepts this recommendation. Digital is a highly vulnerable medium that requires immediate and continuous intervention. UNHCR DER, through RAS continues to develop guidance and solutions to protect the digital archive of UNHCR, including the Digital Preservation Strategy. We welcome the opportunity to formalize that chapter within the RAM strategy, to be published in June 2022. (a) DER through RAS will transform the existing Digital Preservation framework into a formalized digital preservation strategy and update the current RAM operational guidance, incorporating its fast-evolving nature that requires flexibility to adapt to new developments and operational realities. (b) RAS has provided comments to the Digital Transformation Strategy, including clear links to the updated RAM Operational Guidance and Digital Preservation Strategy. Furthermore, RAS also provided a draft roadmap of mainstreaming RAM elements in their proposed creation of 'Digital Centre of Excellence' and incorporating RAS'

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						RAM and digital preservation RBM indicators within COMPASS that ensures UNHCR's operational commitment.
5	The UNHCR Division of External Relations should: (a) finalize the digital transformation strategy that includes targets for effectiveness and efficiency of business processes and for the potential reduction of UNHCR environmental footprint; and (b) update the operational guidelines for digitization to address inter alia gaps in the budgeting of digitization projects and stipulate the standard approach for the destruction of paper individual case files of persons of concern once digitized.	Important	Yes	(a) Chief of RAS (b) Chief of RAS	(a), (b) RAS had already provided necessary input to the Digital Transformation Strategy December 2022	 UNHCR accepts this recommendation. DER is aware of the importance of the Digital Transformation Strategy and the pivotal elements of RAS' RAM in its realization. (a) RAS has provided comments and feedback to the draft version of the Digital Transformation Strategy. RAS has also expressed its reservation towards the assumption that digitization will result in cost savings. Furthermore, there would be limited positive impact towards climate change but reducing the paper footprint. RAS further agrees that the Strategy will significantly contribute to the transformation of business and business continuity by creating efficiencies, improving knowledge sharing and collaboration. (b) RAS has provided inputs to the Digital Transformation Strategy with links to the soon-to-be updated RAM guidance, Digital Preservation guidance, and required resources. (d) Contrary to the perception from the OIOS audit, RAS, together with DIP aligned in support of operations

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						in disposing physical files, but after they are fully compliant with the security, quality, and sustainability guidelines of digitization. DER will advocate for UNHCR-wide solutions across the HQ, including DIST, DIP, GDS, LAS, and the Bureaux concerning the destruction of paper files.
						Structured, continuous support from DIST, DIP, GDS, LAS, and the Bureaux, is essential for DER/RAS to be able to advocate for UNHCR-wide solution.
6	The UNHCR Division of External Relations should: (a) continue its progress in taking an inventory of the remaining undocumented permanent records stored in the central archives; and (b) conduct cost benefit analyses on the establishment of records centres in different regions to store closed individual case files of persons of concern and/or of their digitization.	Important	Yes	(a) Senior archivist (b) Chief of RAS	(a) 30 November 2024 (b) December 2025	 UNHCR accepts this recommendation. (a) DER has prioritized efforts to accelerate existing work on eliminating the backlog of undocumented and under-documented records, seeking resources and funding where available, and is now part of a project that runs until 2024 to resolve this issue, including establishing catalogues for undocumented permanent archives in the central archives. (b) Regional Archivists will work with the Bureaux to identify records storage facilities available in their respective regions that meet
						respective regions that meet UNHCR's requirements, and to identify potential efficiencies. The project is comprehensive and requires additional resources to be

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						identified by the Bureaux to complete, in the following steps:
						 Estimation of number of paper IC files in the regions (April 2022) Project that reviews- appraisal of Individual case files (IC) (December 2022) Pilot project in Pretoria coordinated by the regional archives and company (December 2023) Cost analysis by region based on results done by regional archivist (depending on deployment of regional archivists, estimated December 2025) Predictable, sustainable, financial,
						and administrative support is required for RAS and across UNHCR to be able to fulfil this recommendation.