



# **INTERNAL AUDIT DIVISION**

## **REPORT 2023/076**

---

### **Audit of UNHCR arrangements for prevention, risk mitigation and response to gender-based violence**

**UNHCR has a comprehensive gender-based violence policy but important gaps remain in its implementation on related prevention, risk mitigation, and response activities**

**20 December 2023**

**Assignment No. AR2023-164-01**

# **Audit of UNHCR arrangements for prevention, risk mitigation and response to gender-based violence**

## **EXECUTIVE SUMMARY**

The Office of Internal Oversight Services (OIOS) conducted an audit of the Office of the High Commissioner for Refugees (UNHCR) arrangements for prevention, risk mitigation and response to gender-based violence. The objective of the audit was to assess the adequacy and effectiveness of UNHCR governance, risk management and control processes in the effective management of Gender-Based Violence (GBV) programmes; and arrangements for monitoring, support and guidance at the Division of International Protection and Regional Bureaux. The audit covered the period from 1 January 2021 to 31 December 2022 and included: (a) strategic planning; (b) prioritization and resource allocation; (c) prevention and risk mitigation; (d) response and case management; (e) monitoring and assessment of GBV policy and performance; and (f) partnerships and coordination.

UNHCR's 2020 GBV policy provided adequate guidance on prevention, mitigation and response in line with its protection mandate. While good practices were observed on implementation of global information campaigns and awareness raising, country operations faced challenges in fully complying with set policy guidance regarding planning, coordinating, implementing, monitoring and reporting on GBV programmes. These challenges were attributed to, amongst other things, inadequate resourcing as well as gaps in guidance, tools, oversight and support by the second line. This impacted the delivery of services and assistance to survivors and affected their recovery from the long-term effects of GBV.

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

- Develop and update, where required, context-specific strategies and standard operating procedures to direct and guide the implementation of GBV programmes;
- Address resource constraints by developing guidance on cost and process efficiencies in GBV programmes, promoting thematic fundraising for related activities and undertaking strategic workforce planning for GBV staff;
- Undertake a comprehensive gender-based violence risk identification, assessment and analysis;
- Ensure that GBV risk mitigation activities are mainstreamed across key UNHCR's sectoral responses;
- Support country operations' increased use of the GBV Information Management System and reinforce information sharing protocols for sharing and analyzing data at national and regional levels;
- Improve the quality of GBV case management by addressing staff shortages and skill gaps by service providers and reinforcing monitoring of related services;
- Ensure country operations implement the standardized policy monitoring framework and conduct situational GBV assessments;
- Ensure country operations use the mandatory GBV core indicators to enhance programme performance; and
- Take measures to strengthen coordination mechanisms in GBV sectoral working groups and management of funded partners, as well as enhance compliance on integration of GBV into regional response plans.

UNHCR accepted all recommendations and has initiated action to implement them. Actions required to close the recommendations are indicated in Annex I

# CONTENTS

I. BACKGROUND	1
II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY	1-2
III. AUDIT RESULTS	2-11
A. Strategic planning	2-3
B. Prioritization and resource allocation	3-5
C. Prevention and risk mitigation	5-6
D. Response and case management	7-9
E. Monitoring and assessment of GBV policy and performance	9-10
F. Partnerships and coordination	10-11
IV. ACKNOWLEDGEMENT	11
ANNEX I	Status of audit recommendations
APPENDIX I	Management response

# **Audit of UNHCR arrangements for prevention, risk mitigation and response to gender-based violence**

## **I. BACKGROUND**

1. The Office of Internal Oversight Services (OIOS) conducted an audit of the Office of the High Commissioner for Refugees (UNHCR) arrangements for prevention, risk mitigation and response to GBV.
2. Gender-Based Violence (GBV)<sup>1</sup> is an umbrella term for any harmful act perpetrated against a person's will and that is based on socially ascribed, i.e., gender differences between males and females.<sup>2</sup> It takes many forms such as rape, intimate partner violence, sexual assault, child and forced marriage, physical assault, female genital mutilation, denial of resources, emotional abuse, and the so-called "honor crimes." Although men can also be subjected to GBV, women and girls are disproportionately affected and are at heightened risk of GBV especially during displacement and times of crisis. In 2022, there were approximately 57.6 million forcibly displaced and stateless women and girls at risk of GBV.
3. National authorities have the primary responsibility of ensuring the safety and well-being of forcibly displaced persons in their territories. UNHCR leads the support provided to national authorities in the coordination of the GBV response for refugees. The response under internal displacement situations is normally led by another United Nations agency, with UNHCR providing operational responses under the GBV area of responsibility. The Division of International Protection (DIP), through its GBV Unit within the Field Protection Service, promotes organization-wide coherence by developing and disseminating policies, monitoring policy implementation at the global level, and providing functional guidance and operational support including knowledge management, sharing best practices and lessons learned.
4. In October 2020, the UNHCR High Commissioner issued a mandatory policy on the prevention, risk mitigation, and response to GBV (hereinafter referred to as GBV policy) which outlined the approach of UNHCR in preventing, mitigating, and responding to GBV. It also articulated nine core actions with related expected outcomes. Regional Bureaux are expected to ensure country operations comply with this policy in their respective regions and report on its implementation annually.
5. As at 30 September 2023, GBV programmes were supported by 110 dedicated GBV workforce positions<sup>3</sup> globally. These included 9 positions at Headquarters and the remaining 101 staff were based in Regional Bureaux and field locations. The combined GBV expenditure for 2021 and 2022 was \$264 million. GBV programmes were primarily implemented through funded partners.
6. Comments provided by UNHCR are incorporated in italics.

## **II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY**

7. The objective of the audit was to assess the adequacy and effectiveness of UNHCR governance, risk management and control processes in effective management of GBV; and arrangements for monitoring, support and guidance at DIP and Regional Bureaux.

---

<sup>1</sup> UNHCR has historically used the term sexual and gender-based violence, often used interchangeably with gender-based violence. With the issuance of the 2020 GBV policy, it now consciously uses the term gender-based violence.

<sup>2</sup> UNHCR has adopted the Inter-Agency Standing Committee's definition of GBV.

<sup>3</sup> Both filled and vacant job posts per UNHCR Staffing Table from Workday system as at 12 October 2023.

8. This audit was included in the 2023 risk-based work plan of OIOS due to the importance attached by UNHCR to eradication of GBV (which is recognized as a human rights violation), as a core component of its protection mandate.

9. OIOS conducted this audit from June to September 2023 in UNHCR Headquarters in Geneva and field locations in Greece, Mexico, Niger, Rwanda, Uganda and Yemen. The audit also considered audit results on GBV programmes from two country operations audited in 2022, i.e., Bangladesh and Nigeria. In addition, the audit covered all seven Regional Bureaux. This thematic audit report focuses on strategic, systemic and recurring issues addressed to second line entities, while observations relating to the first line will be included in reports addressed to the respective country operations. The audit covered the period from 1 January 2021 to 31 December 2022. Based on an activity-level risk assessment, the audit covered higher and medium risks areas, which included: (a) strategic planning, (b) prioritization and resource allocation, (c) prevention and risk mitigation, (d) response and case management, (e) monitoring and assessment of GBV policy and performance, and (f) partnerships and coordination.

10. The audit methodology included: (a) interviews of key UNHCR and partner personnel; (b) review of GBV projects in eight country operations with expenditures of \$ 22 million covering 26 funded partners; (c) review of financial and operational data and documentation from UNHCR enterprise systems; (d) administration of questionnaires to all Regional Bureaux for assessment of monitoring, support and guidance extended to country operations; and (e) sample testing of controls.

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

### **III. AUDIT RESULTS**

#### **A. Strategic planning**

##### Need to strengthen country-specific strategies and update standard operating procedures (SOPs)

12. UNHCR has identified GBV as one of its eight strategic priorities for 2022-2026. The GBV policy issued in October 2020 is comprehensive and demonstrates the organization's commitment to addressing GBV as a core component of its protection mandate. UNHCR's policies and strategies also play a vital role in translating international instruments related to GBV into action. Country-specific GBV strategies and attendant SOPs were needed to cascade this strategic requirement at regional and country levels.

13. The audit identified inconsistent approaches towards development of GBV strategies among the operations, with only three country operations (Mexico, Niger and Uganda) having prepared standalone strategies in the period under review. In contrast, operations in Bangladesh, Greece, Rwanda, Nigeria and Yemen included GBV aspects in their multi-year protection and solution strategies. In these cases, certain core GBV-specific elements such as core policy outcomes and links to other sectors were not sufficiently detailed. Robust country specific GBV strategies should ensure that organization wide GBV guidance is tailored to unique country contexts as a basis for effective programme interventions at that level. Further, while referral pathways were adequately articulated in all operations reviewed, four (Bangladesh, Greece, Niger, and Rwanda) of the eight operations audited had outdated GBV SOPs.

14. Given the findings above, Regional Bureaux needed to augment their support and guidance to country operations on GBV strategic planning and prioritization, capacity development and development of related SOPs.

**(1) To ensure effective implementation of gender-based violence programmes, the UNHCR Division of International Protection in coordination with the Regional Bureaux should ensure that country operations have context specific strategies and updated standard operating procedures.**

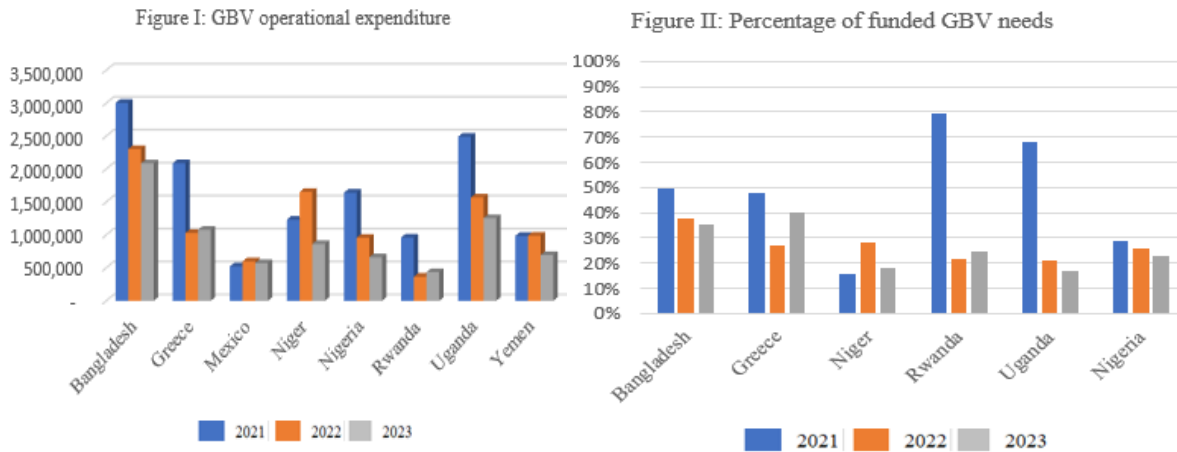
*UNHCR accepted recommendation 1 and stated that Regional Bureaux with the support of DIP would support operations to: (a) implement or update country level strategies within the Multi-year Protection and Solutions Strategy and (b) update relevant GBV SOPs.*

## B. Prioritization and resource allocation

Despite being one of UNHCR’s core strategic areas, GBV was severely underfunded

15. The GBV policy requires that country operations plan, prioritize, and allocate resources to related programmes in alignment to their protection and assistance needs. UNHCR’s global needs for GBV prevention, mitigation and response programmes in 2022 and 2023 were estimated at \$271 and \$340 million, respectively. However, UNHCR could spend only \$120 million and \$144 million in 2021 and 2022, respectively. In the coordinated humanitarian response plans, the GBV sub-sector<sup>4</sup> was similarly underfunded as per the United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA) financial tracking service<sup>5</sup>. The sub-sector only received \$193 million out of global estimated needs of \$963 million (20 per cent) in 2022. In 2021, 29 per cent of the requirements were funded which represented a nine per cent decline in the needs covered, from 2021 to 2022.

16. The eight operations reviewed were all severely underfunded with the percentage of needs met ranging between 16 to 79 per cent in 2021 and 21 to 38 per cent in 2022. Not only was the GBV expenditure decreasing in the eight operations between 2021 and 2023 (see Figure I), but the percentage of funded needs was also generally on the decline as reflected in Figure II for six of the eight countries.



17. The resource constraints impacted the prioritization of GBV activities. For example, a 50 per cent budget reduction in Greece in 2022 resulted in the closure of the GBV partner’s offices and the termination of all GBV related activities in one island location which accounted for 15 per cent of referrals for case

<sup>4</sup> UNOCHA coordinates the humanitarian community (Both UN and non-UN agencies) to develop a collective plan for response during emergencies. The humanitarian actors are organized into core sectors such as protection, food security and health. GBV is one of the sub-sectors under the protection sector in the humanitarian cluster system.

<sup>5</sup> [Protection - Gender-Based Violence 2022 | Financial Tracking Service \(unocha.org\)](https://www.unocha.org/financial-tracking-service).

management in the previous year. In Uganda, there was a decline in the provision of material support to GBV survivors including menstrual hygiene kits, cash assistance and livelihoods opportunities. Moreover, safety audits and capacity building activities were curtailed.

18. With available funding reaching its limits, closer attention needed to be paid to finding other effective ways of managing costs. In line with the Grand Bargain<sup>6</sup> commitments, focus also needs to shift to targeting cost and process efficiencies in programme implementation. Such measures could include increased partnerships with national responders, rationalizing the number of GBV partners, establishing robust partner staffing plans and reducing burdensome financial and reporting requirements. In addition, as per the Roles, Accountabilities and Authority Framework, Regional Bureaux and country operations needed to pro-actively identify, seek out and take up fundraising opportunities with the support of the Division of External Relations.

#### Need to conduct strategic workforce planning for GBV

19. GBV programming is especially staff intensive. UNHCR had 110 dedicated GBV positions, i.e., those with the term “GBV” in the position title, and their distribution across the seven regions as at 12 October 2023 is reflected in figure III below.<sup>7</sup> Forty of the 110 positions (36 per cent) were vacant as at 12 October 2023. From the 70 filled positions, 40 were at Professional level, 8 at National Officer level and 22 at General Service level. In addition, 39 were regular positions while 31 were temporary, and females constituted 88 per cent of all personnel. UNHCR also relied on funded partners to deliver services in all countries reviewed. The workforce available, however, was insufficient to design, plan, manage and monitor GBV programmes.

20. The distribution and seniority of the limited GBV workforce resources varied across the Regional Bureaux as reflected in Table 1. For instance, despite MENA Regional Bureau having spent 24 per cent of its expenditure on GBV in 2021 and 2022, the region had the lowest number of related workforce in the GBV Functional Area (5 positions or 4.5 per cent). The Regional Bureau clarified that several staff dedicated more than 90 per cent of their time to GBV although they were not in the GBV functional area. The number of GBV positions in five sampled operations were: Bangladesh-1, Niger-2, Nigeria-1, Uganda-4 and Mexico-1. The other three (Greece, Rwanda and Yemen) of the eight country operations reviewed did not have any dedicated GBV workforce and they relied on GBV focal points, some of whom had related expertise and were also responsible for other protection areas.

**Table 1: Distribution of GBV positions per region**

<b>Region</b>	<b>Positions</b>	<b>Percentage</b>
Eastern Horn & Great Lakes	30	27%
Asia & the Pacific	17	15%
Europe	15	14%
West & Central Africa	15	14%
Southern Africa	14	13%
Europe (HQ)	9	8%
Americas	5	4.5%
MENA	5	4.5%
<b>Total</b>	<b>110</b>	<b>100%</b>

<sup>6</sup> An agreement between the largest donors and humanitarian organizations who have committed to get more means into the hands of people in need and to improve the effectiveness and efficiency of humanitarian action.

<sup>7</sup> Per UNHCR staffing table including the GBV Functional Area 2.2.e extracted from the Workday System as at 12 October 2023. Analysis does not consider protection posts that may cover GBV responsibilities.

21. Further, the GBV sub-sector witnessed a declining workforce with resources reducing by 30 per cent over a three-year period. For instance, between March 2022 and September 2023, 20 positions (18 per cent) of all positions were discontinued, 4 were downgraded and 3 had a significant title change. Thus, closer attention is required to strategic workforce planning to ensure alignment of the GBV workforce with the organization's strategic priorities.

22. This workforce resource situation was attributed to inadequate resourcing at country and regional levels. The inadequate workforce resources to run GBV programme activities also placed a strain on other protection staff in the operations.

**(2) To address resource constraints related to gender-based violence (GBV) programmes, the UNHCR Division of International Protection in coordination with the Regional Bureaux should: (a) develop guidance on cost and process efficiencies; (b) in collaboration with the Division of External Relations, strengthen related thematic fundraising efforts at regional bureau and country levels; and (c) in collaboration with the Division of Human Resources, undertake strategic workforce planning for GBV programmes.**

*UNHCR accepted recommendation 2 and stated that DIP would work: (a) with DSPR and Regional Bureaux to inform resource allocation and prioritization exercises, informed by the application of the GBV Policy Monitoring Framework and the Strategic Directions Focus Area Plan; (b) with DER and Regional Bureaux to advance thematic fundraising efforts for Gender Equality and GBV and explore fundraising opportunities at the regional level. DIP has embedded a staff member within DER to support this effort; and (c) with DHR to develop a strategic workforce plan.*

## C. Prevention and risk mitigation

### Good practices were observed in information campaigns, awareness raising and group activities

23. One of the two primary objectives of the GBV policy is reducing the risk of GBV for all persons under UNHCR mandate. It highlights the imperative not only to respond to violence once it has occurred, but also, importantly, to prevent GBV from occurring by addressing its root causes and embedding gender equality in all aspects of UNHCR's work.

24. The audit identified good practices in the awareness raising activities and information campaigns. This included operations' participation in the international "16-days of activism" which was conducted globally with specific activities tailored to suit local context. The prevention activities conducted included: (i) engaging men in accountable practice programmes in Iraq, Malaysia, Nigeria, Pakistan, South Sudan, Uganda, the Syrian Arab Republic, Indonesia and Thailand, (ii) the start, awareness, support, action (SASA) model in Bangladesh, South Sudan, Rwanda and Uganda; and (iii) the girl shine effort in Bangladesh, Cameroon, Uganda, Libya and the Syrian Arab Republic.

### Need to undertake a comprehensive analysis of GBV risks

25. The GBV policy requires that operations anticipate and identify GBV risks and take prompt action to mitigate them. These risks should be included in the operations' risk registers. In its risk assessment, DIP identified the risk of inadequate GBV programming and coordination which could result in inadequate prevention, mitigation, and response programmes. One of the important mitigations to this risk, which remained outstanding, was monitoring compliance with the GBV policy in the field. The audit also noted that only five (Bangladesh, Mexico, Niger, Nigeria, and Uganda) of the eight countries assessed GBV risk in their country risk registers. Three countries (Greece, Rwanda and Yemen) only identified the risk of



sexual exploitation and abuse, which is a subset of GBV. In line with the policy and considering that GBV is a strategic organizational priority, a comprehensive and in-depth risk analysis and assessment of all GBV risks needed to be undertaken.

**(3) The UNHCR Division of International Protection in coordination with the Regional Bureaux should support the country operations to undertake a comprehensive gender-based violence risk identification, assessment and analysis.**

*UNHCR accepted recommendation 3 and stated that Regional Bureaux would advise country operations to consider whether they have substantial residual GBV risks in protection or other sectoral programming and reflect it in their risk register to ensure that they are managed accordingly.*

#### Need to mainstream GBV risk mitigations into relevant sectors and areas of work

26. GBV risk mitigation is important in ensuring that actions are taken in each sector and area of work to reduce risks and exposure to GBV and improve safety as part of an agency-wide mainstreaming approach. However, as already mentioned, contrary to UNHCR requirements, operations did not always conduct safety risk assessments to identify GBV risks and challenges within the camps/settlements, some due to lack of funding.

27. The operation in North-East Nigeria had implemented mitigation measures in other sectors to reduce GBV, such as installation of solar lights in areas identified as unsafe, provision of sex-segregated washrooms and latrines in the settlements and strengthening GBV mitigation through inter-agency coordination. There was a need to systematize formal cross-sectorial mechanisms for GBV risk mitigation in the other countries. For example:

- In the Water, Sanitation and Hygiene (WASH) sector, it was important for the operations to construct latrines in Rwanda, provide lighting at water collection points in Uganda, and improve the disposition and location of toilets and washrooms in Greece.
- In the shelter sector, there was a need to enhance lighting, housing safety and amenities in Uganda, Rwanda and Greece operations.
- In the energy sector, addressing scarcity of firewood sources in Uganda would reduce GBV risks associated with firewood collection.
- In education sector, there was a need to address low school enrolment rates in Niger which otherwise raised the risk of GBV for girls.

28. The gaps were caused by inadequate coordination and collaboration across and within sectors, and this impacted the delivery and accountability of GBV related services by service or sector.

**(4) The UNHCR Regional Bureaux in coordination with the Division of Resilience and Solutions and the Division of International Protection should ensure that operations mainstream gender-based violence risk mitigation activities into key UNHCR sectoral responses.**

*UNHCR accepted recommendation 4 and stated that Regional Bureaux in coordination with DRS and DIP would support audited operations in their efforts to implement and monitor GBV risk mitigation activities across UNHCR's sectoral response to the degree possible within available resources.*

## D. Response and case management

### Need for standardized collection, reporting and analysis of GBV data

29. Information management is a key element of quality case management. GBV Information Management System (GBVIMS) and standards were created in 2007 to facilitate safe and ethical collection, storage, and sharing of survivor-reported data in a standardized and effective manner in humanitarian settings. The GBVIMS and related tools have since then been modified and now has an online module called GBVIMS+. In addition to the basic tools used for incident monitoring in the paper/excel based tools, the GBVIMS included functionalities for GBV case management.

30. Globally, 18 operations (14 per cent) had implemented all or part of the paper-based or online module of GBVIMS. DIP had initiated discussions with 10 other operations on adoption of the system. No country in the Americas and Caribbean region was using any form or tool of GBVIMS at the time of the audit, and there was limited GBV related human resource and technical capacities on information management in the region.

31. All the countries reviewed had varying approaches to GBV data and information management, with challenges related to standardization noted. While all offices with proGres version 4 were required to use the GBV module, only 43 per cent of such operations were using it for case management by the end of 2022. For instance, the operation in Mexico was using proGres, while the partners used it in conjunction with other tools like KoBO<sup>8</sup> and Microsoft (MS) Excel. The operation in Uganda maintained manual records because its use of the proGres module was impacted by poor connectivity and system downtime. The operations in Rwanda and Greece used MS Excel and the one in Yemen used GBVIMS for refugees and asylum seekers but used MS Excel for IDPs due to context-specific limitations.

32. Further, some operations, e.g., Niger lacked comprehensive statistics about incidents, demographic profiles, referrals, and service gaps to inform decision making. Additionally, the analysis and reporting of data in the GBVIMS was primarily conducted at country level, and information only shared where data sharing protocols were in place across key stakeholders. However, because no protocols were signed at the regional and global levels, no regional/global statistics existed. Without GBV data and trend analysis, it was challenging to identify patterns, incident surges, or factors contributing to GBV.

33. The issues above were caused by ineffective coordination of GBV data management in established multi-sectoral working groups including United Nations agencies. Consequently, gaps in the collection, analysis and reporting of quality and comprehensive data resulted in the lack of reliable GBV data for programme design, planning and decision making at programme, national, regional and global levels.

**(5) The UNHCR Division of International Protection in coordination with the Regional Bureaux should develop and monitor a plan to increase country operations' implementation of the Gender-Based Violence Information Management System and reinforce information sharing protocols at national and regional levels for centralized data analysis.**

*UNHCR accepted recommendation 5 and stated that: (a) Regional Bureaux with the support of DIP would assess and implement GBVIMS in country operations where appropriate; and (b) undertake Information Sharing Protocols (ISPs) mapping and develop and revise them as necessary, with due*

---

<sup>8</sup> The KoBo Toolbox is a tool that supports data collection using mobile devices such as mobile phones or tablets, as well as with paper or computers

*regard to data protection and security concern; and DIP would engage interagency GBVIMS actors to discuss the possibility of regional level ISPs.*

#### Need to strengthen the timeliness, appropriateness and quality of the GBV case management

34. The Inter-Agency guidelines on GBV case management that were developed by various humanitarian agencies outline a step-by-step process for GBV case management, i.e., from identification and intake to safety planning, referral, and follow-up. They emphasize a survivor-centered approach, which puts the rights of survivors at the forefront of all actions and ensure that they are treated with dignity and respect. The audit sampled and reviewed 86 casefiles from funded partners in five country operations, i.e., 25 in Bangladesh, 10 in Greece, 20 in Niger, 12 in Nigeria and 19 in Yemen. Case files were not provided for review in three countries.

35. Contrary to the survivor-centered approach, the audit noted that case management was mechanically done and driven by completion of templates without adequate consideration of individual protection needs. Further, caseworkers in Bangladesh and Nigeria did not display a clear understanding of the survivors' situations and immediate needs and this impacted the development of clear action plans. Moreover, one implementing partner in Niger had only male case managers and supervisors yet survivors were predominantly women. Female caseworkers would have safeguarded the emotional and physical safety of survivors.

36. Further, the Inter-Agency minimum standards for GBV in emergencies programming that defined the minimum standards for quality case management were not followed:

- In rape cases involving children in Niger, Nigeria, and Bangladesh, best interest procedures were not always followed to agree the appropriate actions to take considering their unique circumstances. Additionally, delays in providing services were noted in these three countries including referral of rape cases for health assistance.
- Survivors did not always have access to services to address their physical safety, health and psychosocial needs as well as access to justice. For example, there was no evidence that some female survivors in Bangladesh received medical assistance for their injuries.
- In Niger, Bangladesh, Nigeria and Yemen, cases were closed without justifications and evidence that survivors had received the assistance they needed to recover from the long-term effects of GBV and that their protection issues were addressed. In Yemen, cases that had remained open since 2021 were revisited and reassessed in 2023 for proper closure.
- Case reviewers in Bangladesh, Niger and Nigeria did not properly supervise case workers leaving many of the issues undetected.
- Case files did not have adequate incident descriptions in Bangladesh, Nigeria and Niger to support effective case management, including safety plans and interventions.

37. The timeliness and quality of case management was significantly affected by the insufficiency and inadequate capacity of caseworkers. The caseworker-to-survivor ratio in most of the countries reviewed was greater than the inter-agency recommended ratio of 1:20. For instance, it was 1:119 in Niger, 1:86 in Uganda, 1:76 in Nigeria, 1:45 in Rwanda, and 1:23 in Bangladesh. The excessive workload impacted not only the quality of case management but also the health of case workers as was noted in Rwanda. The inadequate quality of case management was evident through the quality of safety and case action plans as well as inaccurate categorization of rape. Caseworkers were unaware of the relevant minimum standards and thus needed to be trained in GBV case management.

38. These issues were caused by inadequate skills, low funding relative to the caseload and insufficient supervision and monitoring of case management by UNHCR. As a result, case management did not adhere to the GBV guiding principles and minimum standards and survivors received low-quality services that failed to meet their protection needs.

**(6) To improve the quality of gender-based violence case management, the UNHCR Regional Bureaux in coordination with the Division of International Protection should address case worker shortages and skill gaps and reinforce monitoring of case management in country operations.**

*UNHCR accepted recommendation 6 and stated that it would continue to address case management capacity and monitoring to the degree possible within available resources and in this context: (a) Regional Bureaux would consult operations and highlight gaps in GBV funding requirements in resource mobilization efforts including in messaging donors; and (b) together with DIP and Global Learning and Development Centre, support the mapping of capacity development needs in country operations to devise a practical way forward to address skills gaps.*

## **E. Monitoring and assessment of GBV policy and performance**

### Delays in monitoring the implementation of the 2020 GBV policy remained a gap in combating GBV

39. The GBV policy required that DIP develop a standard GBV framework for monitoring the implementation of the policy. This would not only support the roll-out of the GBV policy globally but also enable the measurement of its impact in achieving key milestones in the nine core actions. However, delays in developing and implementation of the monitoring framework impacted the monitoring of GBV programmes in Southern Africa, Europe and Americas. On the other hand, a provisional tool was released in July 2021 in MENA, Asia, and West & Central Africa, and East, Horn of Africa and Great Lakes regions. Globally, only 39 per cent of operations were using the provisional monitoring framework.

40. The policy also required that regional and global analysis and aggregation of the programme results be conducted, and results shared in the public domain. DIP was working on a dashboard that would aggregate the global assessment results to facilitate this reporting. Aggregating and analyzing data from the monitoring framework would not only support the assessment and reporting of progress in achieving GBV strategic priorities but also in identifying impediments and instituting timely course corrections to ensure the programme stays on track.

### Need to conduct situational GBV assessments and improve programme performance




41. The GBV policy also requires that country operations conduct situation assessments for each location at least annually. However, in six of the eight countries reviewed, namely: Bangladesh, Greece, Niger, Nigeria, Rwanda and Uganda, annual assessments were either not conducted at all or, where done, did not cover each location. As a result, information on GBV types and scope, risk factors, gaps in services, resourcing, and capacity in different contexts, which was critical for planning and prioritization, were not documented.

42. Included in UNHCR's results-based management system - COMPASS, is outcome area 4, with three core indicators dedicated to GBV, which country operations are encouraged to report on. However, the selection of this outcome area was not mandatory and was dependent on the country contexts. Moreover, no further guidance was available to guide country operations on decisions on whether to include this outcome area in their respective performance frameworks. In 2022 and 2023, 62 per cent of operations and

multi-country offices were reporting against this outcome area. A decision was made that one GBV indicator will be mandatory from 2024, thus all operations would be expected to report results against it.

43. When the GBV outcome area is included by a country operation as part of the results-framework, it comes with three mandatory core indicators that must be reported on. A review of the 2022 performance against the three indicators was low as presented in Figure III below.

**Figure III: 2022 GBV performance in core indicators**

GENDER-BASED VIOLENCE		Population concerned	Percentage of countries with a result:			
			below 25%	between 25% and 50%	between 50% and 75%	above 75%
4.1 	Proportion of people who know where to access available gender-based violence services	IDPs	31%	13%	25%	31%
		Refugees and asylum-seekers	11%	11%	25%	53%
		Returnees	17%	0%	17%	67%
4.2 	Proportion of people who do not accept violence against women	IDPs	8%	15%	31%	46%
		Refugees and asylum-seekers	8%	6%	17%	69%
4.3 	Proportion of survivors who are satisfied with gender-based violence case management services	IDPs	20%	30%	10%	40%
		Refugees and asylum-seekers	2%	5%	19%	74%

44. The low programme performance reflected in the table above indicated the need to strengthen programme implementation and performance.

**(7) The UNHCR Division of International Protection in coordination with the Regional Bureaux should ensure country operations implement the standardized monitoring framework and conduct the required situational GBV assessments.**

*UNHCR accepted recommendation 7 and stated that DIP would launch the final version of the global policy monitoring tool for the use of Regional Bureaux and country operations.*

**(8) To enhance programme performance, the UNHCR Division of International Protection in coordination with the Regional Bureaux and the Division of Strategic Planning and Results should ensure that country operations use the mandatory GBV core indicators.**

*UNHCR accepted recommendation 8 and stated that Regional Bureaux together with DIP and DSPR, would continue to monitor the uptake of the GBV Outcome Area indicators and the quality of reporting.*

## F. Partnerships and coordination

### Need to strengthen coordination mechanisms and foster partnerships to enhance GBV collaboration

45. Per the GBV policy, UNHCR country operations partner and advocate with host governments and support the establishment and/or strengthening of national coordination mechanisms. This should involve local and national responders in inter-agency coordination and include national and international non-government organizations, host communities and faith-based organizations.

46. Operations in three of the eight countries reviewed (Greece, Niger and Uganda) needed to strengthen collaboration in the GBV sectoral working groups. GBV sectoral working groups at local and national levels in Greece were impacted by passive participation by members and reductions in budgets and

workforce numbers which inadvertently affected related programme implementation. Coordination meetings at settlement and national levels in Niger were not held or were irregular and this was a missed opportunity to create synergies among partners. National and settlement-level coordination meetings in Uganda focused on reporting activities rather than promoting collaboration with key stakeholders.

47. All the eight countries reviewed worked with funded partners to implement GBV programmes. However, three operations (Niger, Rwanda and Uganda) experienced challenges in managing the GBV funded partnerships. For instance, in the implementation of GBV SASA programme by partners in Rwanda and Uganda, the absence of clear coordination and lack of or inadequate mapping of services resulted in duplication of related activities and also led to inefficiencies. Additionally, the discontinuation of an international partner in Rwanda led to duplication of efforts among the new and remaining partners.

48. Identified gaps in established GBV coordination mechanisms impacted collaboration among the different sectors and stakeholders, which was key for successful programme implementation. This was also a missed opportunity to review the effectiveness of and address challenges in GBV programmes.

#### Need to ensure inclusion of GBV in Regional Response Plans (RRPs)

49. RRP should be prepared so as to ensure that GBV is specified as a sub-sector of protection with specific situational analysis, disaggregated targets, specialized prevention and response interventions, monitoring framework and funding requirements.

50. An internal UNHCR review showed that GBV elements were not consistently included in seven RRP in 2021. UNHCR revised its templates to require explicit inclusion in RRP of GBV risk mitigation interventions across sectors and to increase GBV expertise within the global clusters it led, i.e., the shelter and camp coordination and camp management. UNHCR also issued a guidance on the need to include GBV prevention, risk mitigation and responses within RRP and collection of data disaggregated by sex, age and disability. Consequently in 2022, 43 per cent of RRP sector specific response plans had partially or fully included GBV risk mitigation measures, an improvement from 12 per cent in 2021.

**(9) The UNHCR Division of International Protection in coordination with the Regional Bureaux should: (a) take measures to strengthen capacity for effective coordination of the gender-based violence (GBV) sectoral working groups, and management of funded partners; and (b) together with the Division of External Relations, enhance compliance with the guidance on integration of GBV into Regional Response Plans.**

*UNHCR accepted recommendation 9 and stated that DIP would: (a) strengthen capacity on the implementation of quality coordination in refugee and mixed settings, supported by the revised approach to the implementation of the refugee coordination model, with integrated GBV coordination guidance and capacity development; and (b) work with Regional Bureaux and DER to improve the articulation of GBV requirements within RRP, Refugee and Migrants Response Plans and others.*

## **IV. ACKNOWLEDGEMENT**

51. 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.

Internal Audit Division  
Office of Internal Oversight Services

## STATUS OF AUDIT RECOMMENDATIONS

## Audit of UNHCR arrangements for prevention, risk mitigation and response to gender-based violence

Rec. no.	Recommendation	Critical <sup>9</sup> / Important <sup>10</sup>	C/ O <sup>11</sup>	Actions needed to close recommendation	Implementation date <sup>12</sup>
1	To ensure effective implementation of gender-based violence programmes, the UNHCR Division of International Protection in coordination with the Regional Bureaux should ensure that country operations have context specific strategies and updated standard operating procedures.	Important	O	Receipt of updated country level strategies and GBV SOPs.	31 December 2025
2	To address resource constraints related to gender-based violence (GBV) programmes, the UNHCR Division of International Protection in coordination with the Regional Bureaux should: (a) develop guidance on cost and process efficiencies; (b) in collaboration with the Division of External Relations, strengthen related thematic fundraising efforts at regional bureau and country levels; and (c) in collaboration with the Division of Human Resources, undertake strategic workforce planning for GBV programmes.	Important	O	Receipt of evidence of: (a) guidance on cost and process efficiencies; (b) strengthened thematic fundraising efforts for Gender Equality and GBV; and (c) a strategic workforce plan for GBV programmes.	31 December 2025
3	The UNHCR Division of International Protection in coordination with the Regional Bureaux should support the country operations to undertake a comprehensive gender-based violence risk identification, assessment and analysis.	Important	O	Receipt of evidence that country operations have undertaken a comprehensive identification, assessment and analysis of GBV risks in protection and other sectoral programming.	31 December 2025
4	The UNHCR Regional Bureaux in coordination with the Division of Resilience and Solutions and the Division of International Protection should ensure that operations mainstream gender-based violence risk mitigation activities into key UNHCR sectoral responses.	Important	O	Receipt of evidence that GBV risk mitigation activities have been mainstreamed into key UNHCR's sectoral responses.	31 December 2025

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> Please note the value C denotes closed recommendations whereas O refers to open recommendations.

<sup>12</sup> Date provided by UNHCR in response to recommendations.

## STATUS OF AUDIT RECOMMENDATIONS

## Audit of UNHCR arrangements for prevention, risk mitigation and response to gender-based violence

Rec. no.	Recommendation	Critical <sup>9</sup> / Important <sup>10</sup>	C/ O <sup>11</sup>	Actions needed to close recommendation	Implementation date <sup>12</sup>
5	The UNHCR Division of International Protection in coordination with the Regional Bureaux should develop and monitor a plan to increase country operations' implementation of the Gender-Based Violence Information Management System and reinforce information sharing protocols at national and regional levels for centralized data analysis.	Important	O	Receipt of evidence that country operations, where appropriate, have implemented GBVIMS and reinforcement of information sharing protocols at national and regional levels and conduct of centralized data analysis.	31 December 2025
6	To improve the quality of gender-based violence case management, the UNHCR Regional Bureaux in coordination with the Division of International Protection should address case worker shortages and skill gaps and reinforce monitoring of case management in country operations.	Important	O	Receipt of evidence that case workers shortages, skill and capacity gaps have been addressed and monitoring of case management in country operations reinforced.	31 December 2025
7	The UNHCR Division of International Protection in coordination with the Regional Bureaux should ensure country operations implement the standardized monitoring framework and conduct the required situational GBV assessments.	Important	O	Receipt of evidence that the new the global policy monitoring tool has been implemented.	31 January 2025
8	To enhance programme performance, the UNHCR Division of International Protection in coordination with the Regional Bureaux and the Division of Strategic Planning and Results should ensure that country operations use the mandatory GBV core indicators.	Important	O	Receipt of evidence of the improved uptake of the GBV core indicators.	31 December 2025
9	The UNHCR Division of International Protection in coordination with the Regional Bureaux should: (a) take measures to strengthen capacity for effective coordination of the gender-based violence (GBV) sectoral working groups, and management of funded partners; and (b) together with the Division of External Relations, enhance compliance with the guidance on integration of GBV into Regional Response Plans.	Important	O	Receipt of evidence of: (a) strengthened capacity for coordination of GBV sectoral working groups; and (b) enhanced compliance on integration of GBV into Regional Response Plans.	31 December 2025



# **APPENDIX I**

## **Management Response**

## Management Response

## Audit of UNHCR arrangements for prevention, risk mitigation and response to gender-based violence

Rec. no.	Recommendation	Critical <sup>13</sup> / Important <sup>14</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
1	To ensure effective implementation of gender-based violence programmes, the UNHCR Division of International Protection in coordination with the Regional Bureaux should ensure that country operations have context specific strategies and updated standard operating procedures.	Important	Yes	Director of the Division of International Protection (DIP) and the Heads of Protection in the Regional Bureaux	31 December 2025	Regional Bureaux, with the support of DIP, will support audited Operations to implement or update country level strategies, within the Multi-year Protection and Solutions Strategy (MYPSS) when appropriate. Regional Bureaux, will support audited Operations to update relevant GBV SOPs, with the support of DIP, as required.
2	To address resource constraints related to gender-based violence (GBV) programmes, the UNHCR Division of International Protection in coordination with the Regional Bureaux should: (a) develop guidance on cost and process efficiencies; (b) in collaboration with the Division of External Relations, strengthen related thematic fundraising efforts at regional bureau and country levels; and (c) in collaboration with the Division of Human Resources, undertake strategic workforce planning for GBV programmes.	Important	Yes	Directors of the Division of International Protection (DIP) and the Division of Human Resources (DHR), and the Heads of Protection in the Regional Bureaux	31 December 2025	DIP will work with the Division of Strategic Planning and Results and Regional Bureaux to inform resource allocation and prioritization exercises. The application of the GBV Policy Monitoring Framework and the Strategic Directions Focus Area Plan will inform these activities. DIP will continue to work closely with the Division of External Relations on the advancement of thematic fundraising efforts for Gender Equality and GBV in coordination with the Regional Bureaux. DIP has embedded a staff member within DER to support this effort. Opportunities at the regional level will be explored with Regional

<sup>13</sup> 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.

<sup>14</sup> 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.

<b>Rec. no.</b>	<b>Recommendation</b>	<b>Critical<sup>13</sup>/ Important<sup>14</sup></b>	<b>Accepted? (Yes/No)</b>	<b>Title of responsible individual</b>	<b>Implementation date</b>	<b>UNHCR comments</b>
						Bureaux, including fundraising to respond to particular regional contexts. DIP will continue to work with DHR, and Regional Bureaux, to develop a strategic workforce plan. The capacity of Operations to adhere to this plan will be influenced by operational needs, prioritization approach and funds available. DIP has already worked closely with DHR on standardizing job descriptions and conducting staffing analysis.
3	The UNHCR Division of International Protection in coordination with the Regional Bureaux should support the country operations to undertake a comprehensive gender-based violence risk identification, assessment and analysis.	Important	Yes	Regional Bureaux Heads of Protection and Regional Risk Advisors	31 December 2025	Regional Bureaux will advise Operations to consider whether they have substantial residual GBV risks in protection or other sectoral programming and reflect it in their risk register to ensure that they are managed accordingly.
4	The UNHCR Regional Bureaux in coordination with the Division of Resilience and Solutions and the Division of International Protection should ensure that operations mainstream gender-based violence risk mitigation activities into key UNHCR sectoral responses.	Important	Yes	Regional Bureaux, Directors of the Division of International Protection and the Division of Resilience and Solutions	31 December 2025	Regional Bureaux in coordination with DRS and DIP, will support audited Operations in their efforts to implement and monitor GBV risk mitigation activities across UNHCR's sectoral response to the degree possible within available resources.  There is significant existing collaboration between DIP and DRS on strengthening GBV risk mitigation across all sectoral areas as part of a mainstreaming project ongoing since 2017. There is also significant available UNHCR

<b>Rec. no.</b>	<b>Recommendation</b>	<b>Critical<sup>13</sup>/ Important<sup>14</sup></b>	<b>Accepted? (Yes/No)</b>	<b>Title of responsible individual</b>	<b>Implementation date</b>	<b>UNHCR comments</b>
						sectoral guidance highlighting GBV risk mitigation interventions and priorities across sectoral areas of work.
5	The UNHCR Division of International Protection in coordination with the Regional Bureaux should develop and monitor a plan to increase country operations' implementation of the Gender-Based Violence Information Management System and reinforce information sharing protocols at national and regional levels for centralized data analysis.	Important	Yes	Director of the Division of International Protection (DIP) and the Heads of Protection in the Regional Bureaux	31 December 2025	<p>Regional Bureaux, with the support of DIP, will assess the appropriateness of audited Operations for the GBVIMS/GBVIMS+, and, if appropriate, take steps towards implementation including assessment and implementation of GBVIMS basic tools.</p> <p>Regional Bureaux, with the support of DIP, will map information sharing protocols (ISPs) in audited Operations to ensure that support will be targeted to develop and revise ISPs as necessary and with regard to data protection and security concerns.</p> <p>DIP will engage interagency GBVIMS actors to discuss the possibility of regional level ISPs.</p>
6	To improve the quality of gender-based violence case management, the UNHCR Regional Bureaux in coordination with the Division of International Protection should address case worker shortages and skill gaps and reinforce monitoring of case management in country operations.	Important	Yes	Director of the Division of International Protection (DIP) and the Heads of Protection in the Regional Bureaux	31 December 2025	<p>UNHCR will continue to address case management capacity and monitoring to the degree possible within available resources. In particular:</p> <p>Regional Bureaux will consult audited Operations and will highlight gaps in GBV funding requirements in resource mobilization efforts, including in messaging to donors.</p>

<b>Rec. no.</b>	<b>Recommendation</b>	<b>Critical<sup>13</sup>/ Important<sup>14</sup></b>	<b>Accepted? (Yes/No)</b>	<b>Title of responsible individual</b>	<b>Implementation date</b>	<b>UNHCR comments</b>
						Regional Bureaux, with the support of DIP and the GLDC as needed, will support the mapping of capacity development needs in audited Operations to devise a practical way forward to address skills gaps.
7	The UNHCR Division of International Protection in coordination with the Regional Bureaux should ensure country operations implement the standardized monitoring framework and conduct the required situational GBV assessments.	Important	Yes	Director of the Division of International Protection (DIP) and the Heads of Protection in the Regional Bureaux	31 January 2025	DIP will launch the final version of the global policy monitoring tool for the use of Regional Bureaux and Operations, taking into account different operational contexts.
8	To enhance programme performance, the UNHCR Division of International Protection in coordination with the Regional Bureaux and the Division of Strategic Planning and Results should ensure that country operations use the mandatory GBV core indicators.	Important	Yes	Directors of the Division of International Protection (DIP) and the Division of Strategic Planning and Results (DSPR) and the Heads of Protection in the Regional Bureaux	31 December 2025	Regional Bureaux, together with DIP and DSPR, will continue to monitor the uptake of the GBV Outcome Area indicators and the quality of reporting.
9	The UNHCR Division of International Protection in coordination with the Regional Bureaux should: (a) take measures to strengthen capacity for effective coordination of the gender-based violence (GBV) sectoral working groups, and management of funded partners; and (b) together with the Division of External Relations, enhance compliance with the	Important	Yes	Directors of the Division of International Protection (DIP) and the Division of External Relations (DER) and the Heads of Protection in	31 December 2025	DIP will continue to work to strengthen capacity on the implementation of quality coordination in refugee and mixed settings. This will be supported by the revised approach to the implementation of the refugee coordination model, with integrated GBV coordination guidance as well as capacity development.

Rec. no.	Recommendation	Critical <sup>13</sup> / Important <sup>14</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
	guidance on integration of GBV into Regional Response Plans.			the Regional Bureaux		DIP will continue to work with Regional Bureaux and DER to improve the articulation of GBV requirements within Refugee Response Plans, Refugee and Migrants Response Plans (RMRP) and other regional protection and solutions frameworks, as appropriate. This will be supported by revised guidance on Integration of protection from GBV in RRP by DIP and DER, joint learning initiatives as well as annual analysis on GBV prevention, risk mitigation and response integration in RRP to monitor improvements by DIP.