INTERNAL AUDIT DIVISION

REPORT 2020/038

Audit of resettlement practices at the Office of the United Nations High Commissioner for Refugees

There was a need to further enhance resettlement planning, processing and monitoring

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Audit of resettlement practices at the Office of the United Nations High Commissioner for Refugees

EXECUTIVE SUMMARY

The Office of Internal Oversight Services (OIOS) conducted an audit of resettlement practices at the Office of the United Nations High Commissioner for Refugees (UNHCR). The objective of the audit was to assess the adequacy of resettlement activities at UNHCR in ensuring the effective use of resettlement to demonstrate international solidarity between member states, as a protection tool and as a durable solution. The audit covered the period from 1 January 2017 to 31 December 2019.

The UNHCR Division of International Protection proactively led in the coordination of an increasing number of resettlement programmes in the Organization, and good practices were in place across several country operations and in the two regional bureaux reviewed. There was, however, a need for UNHCR to further enhance resettlement planning, processing and monitoring.

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

- Assess the effectiveness of the Projected Global Resettlement Needs (PGRN) process, enhance the PGRN report, and define an action plan to elaborate on coordinated advocacy approaches towards a more balanced yearly distribution of quotas and less restrictive selection criteria;
- Enhance existing corporate tools to adequately display and track information on resettlement quotas;
- Review staffing benchmarks to reflect current operational environments and ensure that country operations staffing levels are in line with established benchmarks or, where appropriate, justify any deviations;
- Update, streamline and consolidate existing guidance on resettlement, reinforce effective coordination between resettlement and other protection areas, and deliver adequate training on the revised guidance;
- Develop and implement audit, operational and performance reporting in *proGres v4* and adequate data migration processes from *proGres v3* to *v4*;
- Analyse the different approaches to decentralization of resettlement activities that highlight weaknesses and strengths in the integrity and efficiency of processes, and develop guidance on standard messaging and communication protocols with resettlement countries; and
- Strengthen procedures for periodic monitoring of cases pending processing and on hold.

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

CONTENTS

Audit of resettlement practices 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 resettlement practices at the Office of the United Nations High Commissioner for Refugees (UNHCR).

2.   UNHCR is mandated by its Statute and General Assembly resolutions to pursue resettlement as one of the three available durable solutions (the other two being local integration and voluntary repatriation) in cooperation with member states. Resettlement is a protection tool for those facing urgent protection needs and also a mechanism of international solidarity and responsibility sharing with states hosting large numbers of refugees. Resettlement refers to the identification, assessment and submission of applications and transfer of refugees from an asylum country to another country that has agreed to admit them and to ultimately grant them permanent residence and eventually citizenship.

3.   From January 2017 to December 2019, UNHCR submitted the applications of 238,187 persons for resettlement, and in the same period 172,794 persons were resettled. The UNHCR operations with the highest number of submissions were Turkey (21 per cent), Lebanon (14 per cent) and Jordan (9 per cent). From 2017 to 2019, most refugees that were resettled originated from Syria (44 per cent), the Democratic Republic of the Congo (20 per cent) and Myanmar (9 per cent). Of the 37 countries that resettled refugees, three countries received 57 per cent of the refugees (i.e., United States of America with 34 per cent, Canada with 13 per cent and the United Kingdom of Great Britain and Northern Ireland with 10 per cent).

4.   In June 2019, UNHCR launched jointly with its stakeholders of the Annual Tripartite Consultations on Resettlement (ATCR)[1], the 2019-2021 Strategy on Resettlement and Complementary Pathways. This Strategy has a vision that third country solutions for refugees be expanded so that by the end of 2028, in total 3 million refugees benefit from effective protection and solutions through resettlement (1 million) in 50 resettlement countries, and complementary pathways (2 million).[2]

5.   The Resettlement and Complementary Pathways Service (RCPS) in the Division of International Protection (DIP) is responsible, inter alia, for: (a) providing policy guidance and technical and operational support to the field; (b) coordinating the resettlement deployment scheme; (c) providing technical advice to emerging resettlement countries; (d) tracking and data analysis of resettlement; (e) delivering training together with the Global Learning and Development Center; and (f) coordinating with co-Chairs of designated resettlement countries as well as participating in relevant inter-agency fora, namely ATCR and its thematic Working Group on Resettlement. As at December 2019, RCPS had 7 professional, 3 general service, and 2 affiliate staff reporting to the Senior Resettlement Coordinator at the P-5 level. There was also a professional staff member, reporting to the DIP Director, who was responsible for data analysis and statistics.

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 of resettlement activities at UNHCR in ensuring the effective use of resettlement to demonstrate international solidarity between member states, as

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[1] ATCR is a a forum that brings together respresentatives from UNHCR, States, civil society, the private sector and academia.

[2] Complementary pathways are safe and regulated avenues that complement refugee resettlement and by which refugees may be admitted in a country and have their international protection needs met while they are able to support themselves to potentially reach a sustainable and lasting solution.

a protection tool and as a durable solution.

8.   This audit was included in the 2019 risk-based work plan of OIOS due to the importance of the strategic use of resettlement as a durable solution and the renewed commitments to strengthen resettlement programmes in the Global Compact on Refugees.

9.   OIOS conducted this audit from December 2019 to April 2020.[3] The audit covered the period from 1 January 2017 to 31 December 2019. Based on an activity-level risk assessment, the audit covered higher and medium risk areas related to resettlement, which included: (a) planning; (b) processing; and (c) monitoring and reporting. The audit was carried out at UNHCR headquarters, and in the following field locations: Burundi, Cameroon, Egypt, Jordan (Representation and Regional Bureau for the Middle East and North Africa, or MENA Bureau), Kenya, Malaysia, Senegal (Regional Bureau for West and Central Africa, or WCA Bureau[4]), Tanzania and Turkey.

10.   The audit methodology included: (a) interviews with key personnel; (b) review of relevant documentation; (c) analytical review of relevant systems, tools and data; (d) sample testing of 280 resettlement cases selected using random and stratified sampling methodologies taking into account the status of cases, their outcomes, processing times, family composition and resettlement categories; (e) observation of resettlement interviews; (f) observation of reception and interview room conditions; and (g) verification of file management systems and physical archives. The audit benefitted from the technical support and contributions of three UNHCR staff who particiated in six audits of field operations and regional bureaux.

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

III.   AUDIT RESULTS

A.   Resettlement planning

<u>The effectiveness of the Projected Global Resettlement Needs process should to be assessed and corporate tools enhanced</u>

12.   Proactive planning for resettlement is reinforced in the Projected Global Resettlement Needs (PGRN) annual planning instructions. OIOS review concluded that planning was generally in place, with the operations reviewed having: (a) analyzed their annual resettlement needs based on assessments for each population group and protection regional/country strategies; and (b) completed their respective country chapters of the PGRN annual report with information of those needs, framed by relevant operational context.

13.   Regional bureaux reviewed and cleared PGRN chapters of country operations/regional offices under their purview and drafted regional resettlement narratives. RCPS consolidated these chapters into the PGRN annual report, which was used for advocacy during ATCR meetings and discussions with stakeholders on resettlement quotas. Once resettlement countries decided on their annual quota, RCPS distributed them per region and operation. The PGRN process was conducted in parallel with UNHCR's annual Results-Based Management (RBM) planning process. It was also completed prior to the ATCR, which was held each year in July. OIOS observed the following practices regarding the PGRN processing and reporting:

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[3] The audit started formally in December 2019, even though the field results started being collected since March 2019.

[4] After 1 January 2020, the WCA Bureau replaced the UNHCR Regional Representation in Dakar. To simplify and adopting a forward-looking perspective, this report will refer to the WCA Bureau when describing the activities delivered by the previous structure.

a. *Methodologies/criteria for determining resettlement needs*: In addition to the standard methodologies defined by UNHCR for assessing their global resettlement needs[5], some operations applied additional criteria, such as pre-set percentages of the total population of refugees (the Representations in Turkey and Jordan) and resettlement countries' selection criteria (the Representation in Burundi), but this was not explained in the PGRN reports, which only described generically the standard methodologies. PGRN reports were lengthy and could be improved by providing more concise information focused on intended results and including up-to-date data, as there were instances where the data supporting forecasts was from two years earlier.

b. *Impact of resettlement*: While PGRN (2017, 2018 and 2019) reports highlighted growing resettlement needs (from 1.2 to 1.4 million refugees), they did not provide information on positive outcomes/impact of resettlement programmes beyond the number of submissions, acceptance rates and departures. For instance, there were no inspiring success stories of resettled refugees, which could be useful for resettlement countries to communicate to their constituents for in-country resettlement advocacy.

c. *Role of multi-country offices*: RCPS had yet to assess the role of the newly created (post-regionalization) multi-country offices in the PGRN process, which needed to consider the diverse functions delivered by and delegated to these offices.

14. The PGRN annual reports showed significant gaps between resettlement needs and proposed targets (i.e., what UNHCR aimed to achieve with its available resources). For the eight operations reviewed, country targets covered projected resettlement needs of only an average of 13 per cent in 2018 and 11 per cent in 2019, with significant differences observed between operations. In the WCA region, the coverage of the assessed needs was 4 and 5 per cent in 2018 and 2019, respectively. RCPS explained that despite advocacy undertaken, targets were determined by trends in quotas allocated to specific country operations/regions and were influenced by resettlement countries' priorities regarding nationalities and regions. This, as well as the unpredictability of resettlement quotas, often rendered operations planning efforts ineffective. This was compounded by changes in targets throughout the year due to: mismatches between UNHCR and resettlement countries' planning cycles; shrinking numbers of resettlement spaces being offered; and changing priorities/operational constraints.

15. The PGRN process and the annual PGRN report had changed little in several years, and DIP was still in the process of assessing its continued effectiveness and whether it was still fit for purpose, after issuance of a survey in 2017 to UNHCR and external stakeholders. Also, DIP had not assessed opportunities to streamline the process and how to better integrate it with UNHCR's enhanced RBM planning process, its multi-year planning approach and the Global Compact on Refugees. Furthermore, despite advocacy undertaken[6], DIP had not developed an action plan to elaborate on meaningful and coordinated advocacy approaches, which was an important tool included in the three-year strategy (2019-2021) on resettlement and complementary pathways to support the expansion of resettlement.

16. UNHCR had also not developed its systems and tools to better globally manage targets and quotas. For instance:

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[5] These methodologies included the use of a mix of different sources of information to obtain data, including specific needs codes in *proGres*, UNHCR's registration and case management system for refugees; community-based approaches/ participatory assessments; and/or external data/ best estimates when internal data available was limited.

[6] For example, production of newsletters, participation in bilateral meetings with resettlement states, and (co)organization and participation in the meetings of the Working Group on Resettlement and of the ATCR.

a. The Resettlement Statistics Report (RSR), the corporate tool developed by DIP to monitor resettlement activities, only recorded targets per operation and per year. Information on quotas was not captured and tracked centrally in the corporate tool.

b. Due to the need for RCPS to maintain oversight over the quota allocation process, operations could only revise their targets in March and September of each year, even though for many operations the quotas changed throughout the year and thus targets were often outdated in RSR.[7] This resulted in inaccurate measurements of progress of submissions against targets.

c. RSR did not include information of projected resettlement needs for comparison between needs, targets and quotas and for trend analysis. Such information could be useful to assist UNHCR in future planning and in advocacy, to improve the predictability of quotas and their balanced distribution throughout the year. RSR also lacked regional overviews.

17.   Due to the gaps described above in existing systems and tools, RCPS and regional bureaux needed to maintain intensive email traffic to communicate information on quotas, which could be subject to delays and omissions. RCPS, regional bureaux and operations also needed to maintain multiple spreadsheets for their resettlement planning and control, which was work intensive and prone to error.

> **(1)   The UNHCR Division of International Protection should: (a) assess the effectiveness of the Projected Global Resettlement Needs (PGRN) process and streamline it after consultation with stakeholders; (b) address gaps in the PGRN report in terms of full disclosure of criteria used by operations to assess resettlement needs, use of up-to-date data for projections, required contributions of multi-country offices, and impact of resettlement; and (c) define an action plan to elaborate on coordinated advocacy approaches towards a more balanced yearly distribution of quotas and less restrictive selection criteria.**
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> *UNHCR accepted recommendation 1 and stated that: (i) a 2017 survey involving States and UNHCR on the usefulness of the current PGRN process provided a helpful reference for the further assessment recommended by OIOS. DIP would consult with UNHCR Bureaux and key operations to evaluate the effectiveness of the process and identify and address potential gaps, including on the use of criteria to assess resettlement needs. These would inform revised PGRN instructions to be issued; and (ii) a calendar of activities that reflects the various levels of advocacy and fora where advocacy is conducted, including relevant supporting documents, were provided for the audit. The three-year Strategy on Resettlement and Complementary Pathway provided a helpful structure for advocacy that utilizes consistent messages from the High Commissioner and other senior managers on the fundamental challenges of limited and often overly conditioned resettlement opportunities available to refugees in need.* OIOS considers part (c) of the recommendation as implemented. Recommendation 1 remains open pending receipt of evidence of the review carried out on the PGRN process and report.
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> **(2)   The UNHCR Division of International Protection should enhance existing corporate tools to adequately display and track information on resettlement quotas per resettlement country and region, country operation or multi-country office, and country of origin.**
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> *UNHCR accepted recommendation 2 and stated that an expansion of the existing RSR platform was considered the best means to meet this recommendation. DIP would pursue the necessary technical discussions to define the technical requirements and related budget and identify/re-prioritize available funding to ensure that the corresponding work can be reasonably pursued in 2021.* Recommendation 2 remains open pending receipt of evidence of the rollout of a tool or of enhancements to the RSR to adequately display and track information on resettlement quotas.

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[7] Targets in the RSR were either the targets initially set by country operations in the PGRN report or the confirmed/expected quotas added by up to 20 per cent of over-submissions, which were requested by some resettlement countries to compensate for denials and withdrawals.

<u>For efficient and effective use of staff resources, there is a need to review staffing benchmarks related to resettlement activities and for operations to document their staffing capacity analysis</u>

18.   As part of resettlement planning, country operations and regional bureaux reported the staffing capacity needed to conduct resettlement activities and defined their resettlement targets in the PGRN country/regional chapters.

19.   OIOS compared the organizational structures and staffing of the Representations in Jordan and Egypt, which were similar. The Representation in Jordan had 26 resettlement staff (19 core staff and 7 affiliate work force, including 10 caseworkers and 4 reviewers) and a PGRN target in 2020 of 6,075 individuals (revised to 5,500 in March 2020). The Representation in Egypt had 29 resettlement staff (21 core staff and 8 affiliate work force, including 12 caseworkers and 7 reviewers), but it had only a PGRN target of 4,500 individuals. Applying the instructions on Proactive Planning for Resettlement for 2020, OIOS calculated that each caseworker would be responsible for delivering an average of 4 cases per week in Jordan (revised to 3 cases due to reduction in quota) and of 3 cases in the Representation in Egypt (both for Syrian refugees and for other nationalities).[8]   These ratios were below the minimum of 5 cases per caseworker prescribed benchmark in RCPS instructions, which was also the same benchmark prescribed in 2017 by the MENA Bureau for the Syrian caseload.

20.   The RCPS instructions provided a range from 5 to 16 cases per caseworker per week, depending on the quality and availability of registration data and whether refugee status determination was in place. Other factors were also considered such as level of access to refugees, adequacy of case identification methodologies, and the extent caseworkers performed extra duties. Even recognizing the different caseload composition of the Representations in Egypt and in Jordan (i.e., majority of Syrians in the latter and more diversified/complex in the former), the low targets versus staffing levels for both operations needed to be reviewed to identify efficiencies going forward.

21.   There were also significant differences in targets established for case reviewers. For instance, in the Representation in Jordan the target was established at 9 cases per week per reviewer, and the Representation in Egypt had established a target of 5 cases per week per reviewer. Corporate benchmarks had not yet been established for reviewers, with each operation defining their targets for this staff in their respective terms of reference.[9]   In the Representation in Egypt, the ratio of reviewers to caseworkers was 1:2, whereas the MENA Bureau's guidance defined a ratio of 1:4.

22.   The Representation in Tanzania had 22 resettlement staff (4 professionals, 12 general service and 4 affiliate workforce). There were 8 caseworkers and 2 reviewers for whom a target of 1,000 individuals (330 cases) had been agreed for 2020, which equated to a target of 1 case per week for each caseworker (adding to activities related with the management of the resettlement pipeline). The overall need for 22 positions dedicated to resettlement activities, in particular of the four professional staff that included a new P-4 Senior Resettlement and Complementary Pathways Officer position, needed to be reviewed considering the significant reduction of resettlement targets in 2020 as compared with previous years (e.g., 6,000 individuals in 2019).

23.   Country operations/bureaux explained that planning for staffing and PGRN targets was done well ahead of the implementation period (in March of the previous year) and based on assumptions that sometimes did not materialize (as in the case of the Representation in Tanzania). They also advised that

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[8] Calculations based on the average case size of the 2019 submissions made by each operation. In Jordan, the average case size for Syrians was 4.8 persons and for other nationalities 3.3 persons, with the overall average of 4.1 persons. In Egypt, the average case size for Syrians was 3.8, while for other nationalities it was 3 persons, considered separately in the calculations since staff were clearly divided in the operation between the Syrian and non-Syrian caseload.

[9] The functions of reviewers were normally delivered by affiliate work force and elaborated in individual terms of reference prepared by the different operations.

staffing benchmarks did not take into account factors that influenced resettlement outputs such as: (a) complexity and the amount of follow up work post submission; (b) number of resettlement countries with ongoing processing at any one time; (c) varied non-protection related criteria (e.g., family size); (d) changes to resettlement quotas and deadlines with little notice impacting the ability to identify cases and plan effectively; and (e) different processing modalities in country operations. OIOS appreciates that the resettlement process can be unpredictable; nonetheless, operations and bureaux need to systematically document in their staffing assessments any such factors that influence the levels of staffing, especially in case of significant deviations from the prescribed benchmarks/guidance.

> **(3)** **The UNHCR Division of International Protection should: (a) review the current staffing benchmarks to determine if they are still relevant and complete taking into consideration current operational environments; and (b) in coordination with regional bureaux, ensure that country operations staffing levels are in line with established benchmarks and exceptions are appropriately justified.**
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> *UNHCR accepted recommendation 3 and stated that the process of reviewing current processing benchmarks needed to be closely linked to the PGRN revision and aligned with UNHCR planning processes. DIP would organize consultations with Bureaux to review the variable criteria for staffing benchmarks.* Recommendation 3 remains open pending receipt of: (a) a copy of the revised staffing benchmarks; and (b) evidence, through provision of a few examples of submissions to the PGRN report, of staffing capacity analysis documented adequately.

B.   Resettlement processing

<u>There was a need to update guidance on resettlement and implement audit and operational reporting in *proGres v4* and improved data migration processes from *proGres v3* to *v4*</u>

24.   UNHCR has issued various guidance to direct its resettlement activities and to ensure adequate processes and safeguards are in place. This included the UNHCR Resettlement Handbook and the baseline SOPs on resettlement. The following was noted:

25.   *SOPs on resettlement*: The eight operations reviewed had all developed country-specific SOPs on resettlement, which were generally consistent to the baseline SOPs. In most cases, the SOPs were still in draft and required to be updated. For instance: (a) the Representation in Kenya needed to incorporate changes due to the introduction of *proGres v4*[10], although this was subsequently addressed; and (b) the Representation in Tanzania needed to reinforce and clarify the individual processing modality after the transition from group processing.

26.   *Identification and prioritization of cases*: The Resettlement Handbook defines that assessment of cases should be transparent and it is an ongoing, active and systematic process that is supported by detailed knowledge of the refugee population and of their specific needs and vulnerabilities. It should be done in collaboration with UNHCR protection, community services and durable solutions staff and partners to help identify and implement appropriate responses and ensure fair access to resettlement. The identification of cases was also influenced by resettlement countries' criteria and quotas, and although this has practical benefits, the practice contradicted the principles in the Resettlement Handbook of fair access to resettlement and identification not being limited by the number of resettlement places available and criteria introduced by resettlement states. Generally, the sources of identification of cases were not adequately documented in the files. Additionally, the following practices did not fully meet the requirements outlined in the Handbook:

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[10] *proGres v4* is the latest version of the system available; however, most country operations were still using *proGres v3*, the previous version of the system.

a. The Representation in Burundi identified cases through *proGres* generated lists that prioritized refugees based on date of arrival and ethnicity. In these lists there was limited information of the refugees' vulnerabilities because *proGres* included outdated specific needs codes, mainly as the last verification exercise of PoCs' data was conducted in 2013. Additionally, there were almost no referrals from UNHCR protection and community services officers (an aspect noted in the DIP 2018 Integrity Mission report) and no external referrals. The operation faced other constraints in case identification and assessment including backlogs in the completion of Best Interest Determination for children and of Medical Assessment Forms for cases with medical needs.

b. The Representation in Cameroon mainly pursued resettlement for its urban caseload, residing in the proximity of the Branch Office. The Representation needed to carry out missions from the country office to its field offices to process cases, but it only carried out a few missions in 2017 and 2018 due to staffing gaps (two missions in total). As a result, resettlement was not available equally to all refugees in the country.

c. The Representation in Jordan identified and prioritized cases for resettlement through a combination of diversified sources: (i) *proGres* data including specific needs codes; (ii) the local Vulnerability Assessment Framework data on health and socio-economic vulnerabilities for the urban Syrian population; (iii) internal referrals of refugees with protection needs from the protection units and field offices for the non-Syrian and camp populations; and (iv) ad hoc use of the Cash-Based Interventions' vulnerability scores for the non-Syrian population. The vulnerability lists that combined the data from sources (i) and (ii) were not generated systematically until December 2019. This hindered the effectiveness of the sound identification methodology that had been used and explained why certain cases were identified several times for resettlement, while others may have been overlooked.

d. The Representation in Kenya did not have complete and accurate data for its identification of cases as: (i) data from its Sub-office in Dadaab did not take into account deaths of refugees notified by health centers; and (ii) the Branch-office in Nairobi until December 2019 had not registered all urban populations living in Mombasa and Nakuru, estimated at 7,500.

e. The Representation in Turkey identified cases based on referrals from partners and from the government and in the latter, cases omitted internal vulnerability/protection assessments.

27.   *Preparation of submissions*: The interview process observed in all locations was generally satisfactory, with caseworkers having a fair understanding of the contents of the applicants' files and countries of origin information. Refugees were informed about the purpose of the interviews and the resettlement process. All operations used *proGres* to prepare and generate the resettlement submission forms. The Representation in Egypt had also implemented a good practice, as its caseworkers provided to refugees, details of processing timelines to better manage their expectations. However, the Representation in Turkey registered a high level of resettlement withdrawals (total of 6,169 cases or 31,611 persons from January 2018 to June 2019, with roughly three per cent of the cases withdrawing after submission and another three per cent after resettlement country's acceptance). Considering this, there was a need for the Representation to provide adequate counselling to refugees to manage their expectations, minimize operational costs to UNHCR and resettlement countries, minimize any adverse impact on the level of quotas, and avoid missed opportunities for other refugees in need of resettlement.

28.   *Review of submissions and decision-making*: One to two levels of reviews of submissions were normally carried, and these reviews were sometimes performed by regional bureaux/offices. The WCA Bureau conducted both the first and second level review of all country operations under their responsibility due to lack of local capacity. The Regional Service Center in Nairobi (currently, the Regional Bureau for East, Horn of Africa and Great Lakes) did not conduct review of the Representation in Kenya's submissions,

despite the high incidence of fraud in the past. However, the Representation's Integrity Officer had implemented spot checks of cases from all locations to verify adherence to the SOPs. In OIOS view, there was a need for a more consistent approach on the review process across operations and regional bureaux. This will be addressed by the implementation of recommendation 6.

29.   *Integrity measures and oversight*: The operations reviewed had generally implemented clear definitions of roles and responsibilities of resettlement staff and the use of *proGres* with adequate segregation of access roles between registration, refugee status determination and resettlement. Relevant training on resettlement had also been provided to different stakeholders. Some operations also implemented video and/or audio-recording of resettlement interviews to support reviews of submissions and/or quality assurance processes (e.g., the Representations in Turkey and Jordan). OIOS observed:

a.   That the Representations in Burundi, Cameroon, Kenya and Turkey did not use enhanced verification of identities of applicants through biometrics during resettlement interactions. The Representation in Kenya had a biometric system but was not using it for resettlement, and the Representation in Turkey was unable to operate the system due to data protection issues in the host country; and

b.   A lack of system-generated audit reports that are essential to alert reviewers on possible changes to key biodata, family composition and photos and to detect potential fraud. The Representations in Cameroon, Jordan and Kenya, all operations using *proGres v4*, were not issuing these reports because of the lack of adequate reporting functionalities and definition of standard reports in the system. The Representation in Kenya had implemented a workaround consisting of reviewers conducting online checks of audit logs and adding screen shots of such checks to files. MENA and WCA Bureaux did not have access to *proGres v4* to verify online the audit logs of cases submitted by operations already using the system, nor did they request operations still using *proGres v3*, where reports could be issued, to submit such reports with resettlement referrals to enhance the integrity of their review.

30.   *Records and file management*: Adequate controls were in place in all operations regarding access to physical files maintained by resettlement staff in their offices while being processed. They were normally kept in locked cabinets and/or locked rooms in the absence of staff. Most operations used the File Tracking System (FTS) for recording file movements, their location, and who kept them. The system was also able to produce audit reports and system alerts (e.g., when files were kept by staff for long periods of time). The Representations in Burundi, Cameroon and Jordan used Excel spreadsheets in parallel with FTS, which was not efficient or effective. The following practices were also observed: (a) the Representation in Egypt needed to more systematically use the FTS oversight functionalities to identify files kept for a long time by staff; and (b) the Representation in Tanzania, created several hard copy files for registration, resettlement, and other protection areas, but OIOS could not establish to what extent information on these files was merged, which would hamper cross-functional coordination.

31.   A review of the documentation of files noted issues in all locations. This included: (a) absence of key documentation due to archiving backlogs; (b) the proliferation/coexistence of (several) electronic and digital archives in parallel with (several) physical archives; (c) lack of guidance on contents and safeguards for each type of archive; (d) inconsistencies between the status of cases in *proGres* and in physical files because of procedural or implementation gaps in operations; (e) lack of communication between operations and regional bureaux on the status of cases; and (f) data migration issues from *proGres v3* to *v4* (this happened for more than 60 per cent of the cases reviewed in the Representation in Tanzania). The inadequate reflection of the status of cases in *proGres* resulted in inaccurate reporting on resettlement and inadequate identification of cases at different processing stages for follow up.

32.   The issues raised above were also due to: (a) the need to up-date guidance on resettlement; (b) the need to improve coordination between resettlement and other protection areas; (c) inadequate

reporting/audit functionalities of *proGres v4*; and (d) continued problems with data migration from *proGres v3* to *v4*. This increased risk of lack of fairness and integrity in the resettlement process and could impact on UNHCR's reputation.

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(4) **The UNHCR Division of International Protection, in coordination with regional bureaux should: (a) update, streamline and consolidate existing guidance on resettlement, and ensure that it reinforces the need for effective coordination between resettlement and other protection areas; and (b) deliver adequate training/sensitization on the revised guidance.**

UNHCR accepted recommendation 4 and stated that the process to revise the baseline SOPs had begun and should be finalized by the end of the calendar year. The SOP webinars, addressed to resettlement as well as other areas of protection as identified by OIOS, would be organized and recorded. Recommendation 4 remains open pending receipt of: (a) a copy of the revised baseline SOPs on resettlement and evidence of the webinars held to sensitize on the revised SOPs; and (b) confirmation of the suitability of the revised SOPs and new tools in reinforcing effective coordination between resettlement and other protection areas.

(5) **The UNHCR Division of International Protection, in conjunction with the Global Data Service and/or the Population Registration and Identity Management Eco-System (*PRIMES*) Executive Committee, should: (a) develop and implement audit, operational and performance reporting functionalities in *proGres v4*, ensuring the field and the Division's engagement in the development of business requirements and testing; and (b) ensure adequate data migration processes from *proGres v3* to *v4*.**

UNHCR accepted recommendation 5 and stated that: (i) a revision of the proGres software was completed, which confirmed the need for changes in the proGres tool to improve its monitoring capacity. With regards to performance and operational functionalities, work was ongoing to design, develop and implement required dashboards and monitoring reports; and (ii) enhanced data migration procedures from proGres v3 to v4 continued to be developed. For resettlement specifically a set of integrity checks were introduced in data migration scripts. Recommendation 5 remains open pending receipt of evidence that: (a) adequate audit, operational and performance reporting functionalities/standard reports are developed in *proGres v4*; and (b) enhanced data migration procedures from *proGres v3* to *v4* are developed.

<u>There was a need to analyse regional approaches, develop guidance and share best practices for the decentralization of resettlement activities from regional bureaux to operations</u>

33.   In the context of the regionalization process at UNHCR, the WCA Bureau was gradually shifting resettlement responsibilities to country operations, based on the assessment of their level of maturity. The responsibilities to be transferred included the first level reviews of resettlement submissions, followed by the second level reviews together with the submissions to resettlement countries. The maturity assessment included results of a survey issued to three main operations in the region (the Representations in Cameroon, Chad and Niger) on their capacity and specific support needs. The Bureau had also developed specific internal diagnostic tools (Excel checklists) to be populated with feedback from the reviews of submissions it carried out. As a quality and integrity oversight mechanism, the Bureau planned to continue to submit all cases to resettlement countries and conduct ad hoc reviews prior to submission for a period to be determined in accordance with the results achieved by operations.

34.   The MENA Bureau also had an approach to gradually decentralize the second level reviews and submissions, currently carried out by the Bureau, to operations based on their assessed level of maturity. This would be done in five sequential stages, each stage having a set of criteria to be met and lasting between two to six months. The decision to progress to the next stage would be based on a joint assessment by the

Bureau and the country operation using pre-defined indicators. The Bureau planned to brief and seek feedback from resettlement countries to ensure their continued confidence in the quality of resettlement activities in the MENA region, which fell under DIP/RCPS responsibility.

35.   OIOS acknowledged the merit of the methodologies put in place by the two bureaux, which supported the required transition from the first to the second line of defence. However, without the involvement of DIP, there is a risk that resettlement activities will not be systematically dealt with and may lack the coordinated approach that was previously in place.

> **(6)   The UNHCR Division of International Protection should: (a) in consultation with regional bureaux analyse the different approaches to decentralization of resettlement activities that highlight weaknesses and strengths in the integrity and efficiency of processes, and share guidance and best practices; and (b) develop guidance on standard messaging and communication protocols with resettlement countries.**
>
> *UNHCR accepted recommendation 6 and stated that DIP would: (i) organize consultations with Bureaux and key operations to compare the different regionalization processes and discuss their strengths and weaknesses. A model approach would be developed based on best practices; and (ii) hold a dedicated meeting of the Priority Situations Core Group to share the information with States on the optimum model for decentralization of specific resettlement activities.* Recommendation 6 remains open pending receipt of: (a) copies of the comparative analysis carried out on the different approaches to regionalization and resulting guidance/best practices shared with the regional bureaux; and (b) evidence of the standard messaging and communication protocols with resettlement countries defined on the regionalization.

C.   Resettlement monitoring and reporting

<u>There was a need for procedures for monitoring resettlement cases pending processing and on hold</u>

36.   Available RSR reports and indicators, while relevant and useful in measuring resettlement performance in the Organization, were not always accurate due to issues with the quality of data input into the tool, which originated from *proGres v3* and *v4*. The lack of confidence in the data discouraged country operations from using the information available in RSR for monitoring purposes. In OIOS view, once the data reliability problem is addressed, and adequate reporting functionalities and reports are available in *proGres v4* (please refer to recommendation 5) and the system is fully rolled out, there is an opportunity for DIP to streamline the resettlement reporting process by avoiding duplicated reporting in *proGres* and RSR.

37.   Operations/bureaux were not systematically monitoring and following up on pending cases (prior and post-submission) and on hold. As a result, there were considerable backlogs in five operations (Burundi, Cameroon, Egypt, Jordan and Turkey) and in the two bureaux reviewed. For example, the Representation in Turkey as at June 2019 had 39,207 persons pending resettlement processing or with cases on hold for more than 180 days. Some of the backlogs reviewed (e.g., in the Representations in Burundi and Cameroon) were due to inadequate follow up communication between the country operation and the respective regional bureau on the status of cases.

38.   Inadequate monitoring of cases pending processing and on hold was due to lack of procedures for local monitoring activities, including clear assignment of responsibility for the task, or to lack of implementation when such procedures were in place. As a result, cases either remained under processing for long periods without being re-assessed, increasing risks to vulnerable refugees and frustration, or had not been updated adequately and were inaccurately reported.

(7)   The UNHCR Division of International Protection should: (a) define the requirement for country operations to periodically monitor cases pending processing and on hold in the revised baseline standard operating procedures on resettlement; and (b) in coordination with regional bureaux implement adequate oversight to ensure such cases are dealt with in a timely manner and involved parties are kept informed.

UNHCR accepted recommendation 7 and stated that the revised SOPs referred to in Recommendation 4 would include the periodic monitoring of cases under processing and on hold. Recommendation 7 remains open pending receipt of a copy of the revised SOPs on resettlement including procedures for operations and bureaux to periodically monitor cases pending processing and on hold.

IV.   ACKNOWLEDGEMENT

39.   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
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STATUS OF AUDIT RECOMMENDATIONS

Audit of resettlement practices at the Office of the United Nations High Commissioner for Refugees

Rec. no.	Recommendation	Critical[11]/ Important[12]	C/ O[13]	Actions needed to close recommendation	Implementation date[14]
1	The UNHCR Division of International Protection should: (a) assess the effectiveness of the Projected Global Resettlement Needs (PGRN) process and streamline it after consultation with stakeholders; (b) address gaps in the PGRN report in terms of full disclosure of criteria used by operations to assess resettlement needs, use of up-to-date data for projections, required contributions of multi-country offices, and impact of resettlement; and (c) define an action plan to elaborate on coordinated advocacy approaches towards a more balanced yearly distribution of quotas and less restrictive selection criteria.	Important	O	Submission to OIOS of evidence of the review carried out on the PGRN process and report.	31 January 2021
2	The UNHCR Division of International Protection should enhance existing corporate tools to adequately display and track information on resettlement quotas per resettlement country and region, country operation or multi-country office, and country of origin.	Important	O	Submission to OIOS of evidence of the rollout of a tool or of enhancements to the RSR to adequately display and track information on resettlement quotas.	31 December 2021
3	The UNHCR Division of International Protection should: (a) review the current staffing benchmarks to determine if they are still relevant and complete taking into consideration current operational environments; and (b) in coordination with regional bureaux, ensure that country operations staffing levels are in line with established benchmarks and exceptions are appropriately justified.	Important	O	Submission to OIOS of: (a) a copy of the revised staffing benchmarks; and (b) evidence, through provision of a few examples of submissions to the PGRN report, of staffing capacity analysis documented adequately.	31 December 2021
4	The UNHCR Division of International Protection, in coordination with regional bureaux should: (a) update,	Important	O	Submission to OIOS of: (a) a copy of the revised baseline SOPs on resettlement and evidence of	31 March 2021

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[11] 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.

[12] 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.

[13] Please note the value C denotes closed recommendations whereas O refers to open recommendations.

[14] Date provided by UNHCR in response to recommendations.

STATUS OF AUDIT RECOMMENDATIONS

Audit of resettlement practices at the Office of the United Nations High Commissioner for Refugees

Rec. no.	Recommendation	Critical[11]/ Important[12]	C/ O[13]	Actions needed to close recommendation	Implementation date[14]
	streamline and consolidate existing guidance on resettlement, and ensure that it reinforces the need for effective coordination between resettlement and other protection areas; and (b) deliver adequate training/sensitization on the revised guidance.			the webinars held to sensitize on the revised SOPs; and (b) confirmation of the suitability of the revised SOPs and new tools in reinforcing effective coordination between resettlement and other protection areas.	
5	The UNHCR Division of International Protection, in conjunction with the Global Data Service and/or the Population Registration and Identity Management Eco-System (PRIMES) Executive Committee, should: (a) develop and implement audit, operational and performance reporting functionalities in proGres v4, ensuring the field and the Division's engagement in the development of business requirements and testing; and (b) ensure adequate data migration processes from proGres v3 to v4.	Important	O	Submission to OIOS of evidence that: (a) adequate audit, operational and performance reporting functionalities/standard reports are developed in proGres v4; and (b) enhanced data migration procedures from proGres v3 to v4 are developed	31 December 2021
6	The UNHCR Division of International Protection should: (a) in consultation with regional bureaux analyse the different approaches to decentralization of resettlement activities that highlight weaknesses and strengths to the integrity and efficiency of processes, and share guidance and best practices; and (b) develop guidance on standard messaging and communication protocols with resettlement countries.	Important	O	Submission to OIOS of: (a) copies of the comparative analysis carried out on the different approaches to regionalization and resulting guidance/best practices shared with the regional bureaux; and (b) evidence of the standard messaging and communication protocols with resettlement countries defined on the regionalization.	31 June 2021
7	The UNHCR Division of International Protection should: (a) define the requirement for country operations to periodically monitor cases pending processing and on hold in the revised baseline standard operating procedures on resettlement; and (b) in coordination with regional bureaux implement adequate oversight to ensure such cases are dealt with in a timely manner and involved parties are kept informed.	Important	O	Submission to OIOS of a copy of the revised SOPs on resettlement including procedures for operations and bureaux to periodically monitor cases pending processing and on hold.	31 March 2021

APPENDIX I

Management Response

Management Response

Audit of resettlement practices at the Office of the United Nations High Commissioner for Refugees

Rec. no.	Recommendation	Critical[15]/ Important[16]	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	The UNHCR Division of International Protection should: (a) assess the effectiveness of the Projected Global Resettlement Needs (PGRN) process and streamline it after consultation with stakeholders; (b) address the gaps in the PGRN report in terms of full disclosure of criteria used by operations to assess resettlement needs, use of up-to-date data for projections, required contributions of multi-country offices, and impact of resettlement; and (c) define an action plan to elaborate on coordinated advocacy approaches towards a more balanced yearly distribution of quotas and less restrictive selection criteria.	Important	Yes	Director DIP	Consultation with Bureaus and key operation: 15 Sept 2020 – 31 January 2021 Revised PGRN instructions by 31 January 2021	UNHCR accepts the recommendation in full. The underlying intention to make the necessary adjustments to ensured continued respect for the PGRN process with necessary adjustments is appreciated. The pace of progress on its various component elements will be tagged to corresponding activities in the existing cycle of RST planning activities. For this reason, we have provided specific dates for self-contained aspects within an overall timeframe of 31 December 2021 to show overall progress on the consolidated raft of measures contained in the recommendation. A 2017 survey exercise involving States and UNHCR colleagues on the usefulness of the current PGRN process provides a helpful reference for the further assessment encouraged by sub-recommendation (a)

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[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.

Rec. no.	Recommendation	Critical[15]/ Important[16]	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						DIP will organize consultations with UNHCR Bureaus and key operations, to evaluate the effectiveness of the process and identify / address potential gaps, including the use of criteria to assess resettlement needs. These will inform revised PGRN instructions to UNHCR Bureaus and Operations by 31 January 2021. DIP will continue to pursue consistent and coherent advocacy through regular bilateral meetings with States, as well as through multi-lateral fora, including the Priority Situations Core Group (PSCG), the ATCR, Working Group on Resettlement and will additionally participate in relevant State and intra-State events and processes specific to RST. The framework of the 3 Year Strategy on Resettlement and Complementary Pathways, with the active participation of States and a wide range of RST interlocutors, provides a helpful structure for advocacy that utilizes consistent messages from the HC and other senior managers, Regional Directors and Country Representatives, on the fundamental challenges of limited and often overly conditioned RST opportunities available to refugees in need. An overview of existing and systematically utilized advocacy

Rec. no.	Recommendation	Critical[15]/ Important[16]	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						opportunities across the range of regular resettlement fora is attached for reference.
2	The UNHCR Division of International Protection should enhance existing corporate tools to adequately display and track information on resettlement quotas per resettlement country and region, country operation or multi-country office, and country of origin.	Important	Yes	Director DIP	December 2021	An expansion of the existing RSR platform is considered the best means to meet this recommendation. DIP will pursue the necessary technical discussions to define the technical requirements and related budget. Considering that DIP did not factor such activities into the 2021 planning process we have set a realistic implementation date that provides sufficient time to identify/re-prioritize available funding to ensure that the corresponding work can be reasonably pursued in 2021.
3	The UNHCR Division of International Protection should: (a) review the current staffing benchmarks to determine if they are still relevant and complete taking into consideration current operational environments; and (b) in coordination with regional bureaux, ensure that country operations staffing levels are in line with established benchmarks and exceptions are appropriately justified.	Important	Yes	Director DIP	31 Dec 2021	The process of reviewing current processing benchmarks needs to be closely linked to the PGRN revision and be aligned to overall UNHCR planning processes. For this reason, an indicative implementation date of 31 December 2021 is provided with the full understanding, as per recommendation 1, of ongoing progress on the specific components of the recommendation.

As will be the case for the PGRN process review, DIP will organize consultations with Bureaus to review the variable criteria for staffing benchmarks, by 31 January 2021 to feed into the PGRN/ACTR in mid-2021. |

Rec. no.	Recommendation	Critical[15]/ Important[16]	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
4	The UNHCR Division of International Protection, in coordination with regional bureaux should: (a) update, streamline and consolidate existing guidance on resettlement, and ensure that it reinforces the need for effective coordination between resettlement and other protection areas; and (b) deliver adequate training/sensitization on the revised guidance.	Important	Yes	Director DIP	31 March 2021	The process to revise the Baseline SOPs has begun and should be finalized by the end of the calendar year. The SOP webinars, addressed to dedicated RST aa well as other areas of protection as identified by OIOS, will be organized and recorded between 15 Jan and 31 March 2021.
5	The UNHCR Division of International Protection, in conjunction with the Global Data Service and/or the Population Registration and Identity Management Eco-System (PRIMES) Executive Committee, should: (a) develop and implement audit, operational and performance reporting functionalities in proGres v4, ensuring the field and the Division's engagement in the development of business requirements and testing; and (b) ensure adequate data migration processes from proGres v3 to v4.	Important	Yes	Director DIP	31 December 2021	UNHCR accepts this recommendation in full and acknowledges the multiple technical and operational aspects which make the designation of a single implementation date challenging, specifically with reference to the completion of the data migration operation by operation. DIP will continue to discharge its role in the PRIMES Executive Committee to ensure full understanding of and follow up to the content and rationale of the OIOS Audit recommendations. A revision of the proGres software was completed in Q2-Q3 2020 which confirmed the need for changes in the proGres tool to allow for the improvement of monitoring capacity. This procurement process is expected to be completed by Q4 of 2020. With regards to performance and operational functionalities, continued work is ongoing in relation to

Rec. no.	Recommendation	Critical[15]/ Important[16]	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						designing, developing and implementing required dashboard and monitoring reports.
						Enhanced data migration procedures from proGres v3 to v4 continue to be developed. The quality of the migrated resettlement data in v4 relies on the data migration scripts transforming the resettlement case data from v3 event records to v4 case records, and on the quality of the data in v3.
						Data cleanup is ongoing. Data migration scripts have been updated considering observations on specific issues encountered during each data migration. For resettlement specifically a set of integrity checks were introduced, including proGres v3 to proGres v4 Resettlement Migration Quality Check Script and RST Quality Analysis Excel
						To facilitate the transfer of the most relevant RST related data from within existing v3 data operations are prioritizing active and recently closed cases. All Event data from proGres v3 is available in the Legacy Event Log in proGres v4. The user can view the data in v4, however, they will not all exist as proGres v4 resettlement case records.

Rec. no.	Recommendation	Critical[15]/ Important[16]	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
6	The UNHCR Division of International Protection should: (a) in consultation with regional bureaux analyse the different approaches to decentralization of resettlement activities that highlight weaknesses and strengths to the integrity and efficiency of processes, and share guidance and best practices; and (b) develop guidance on standard messaging and communication protocols with resettlement countries.	Important	Yes	Director DIP	June 2021	DIP will organize consultations with Bureaus and key operations to compare the different regionalization processes and discuss the strengths and weaknesses of Bureau approaches to date discussed. A model approach will be developed based on best practices.

A dedicated meeting of the PSCG will be organized to share the information with States on the optimum model for decentralization of specific resettlement activities. |
| 7 | The UNHCR Division of International Protection should: (a) define the requirement for country operations to periodically monitor cases pending processing and on hold in the revised baseline standard operating procedures on resettlement; and (b) in coordination with regional bureaux implement adequate oversight to ensure such cases are dealt with in a timely manner and involved parties are kept informed. | Important | Yes | Director DIP | 31 March 2021 | The revised SOPs in response to Recommendation 4 will be the vehicle to include the periodic monitoring of processing and hold cases. |