

**INTERNAL AUDIT DIVISION** 

### **REPORT 2021/078**

Audit of the Multi-Country Office in Australia of the Office of the United Nations High Commissioner for Refugees

The Multi-Country Office supported the promotion and protection of the rights of persons of concern in the region. However, it needed additional guidance and support from the Regional Bureau to address protection risks in the region

27 December 2021 Assignment No. AR2021-141-01

#### Audit of the Multi-Country Office in Australia for the Office of the United Nations High Commissioner for Refugees

#### **EXECUTIVE SUMMARY**

The Office of Internal Oversight Services (OIOS) conducted an audit of the Multi-Country Office in Australia for the Office of the United Nations High Commissioner for Refugees (UNHCR). The objective of the audit was to assess the adequacy and effectiveness of the Office in managing its mandated activities. The audit covered the period from 1 January 2019 to 31 December 2020 and included a review of: (a) fair protection process and documentation; (b) favourable protection environment; (c) programme monitoring and reporting; (d) financial tracking, reporting and controls; and (e) cash-based interventions.

The Office was responsible for promoting and protecting the rights of its persons of concern (PoCs) in the region, but its operations were often constrained by complex political issues, limited capacities of governments in the region and restrictions due to the COVID-19 pandemic. Overall, there was a need for additional guidance and support from the Regional Bureau to improve protection of PoCs in the region.

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

- Develop procedures to guide staff in their monitoring responsibilities and thereby facilitate improvement of reception conditions for PoCs and their access to status determination procedures;
- Address: protection gaps related to statelessness and collect and validate related data on PoCs in the region; and risks arising from possible displacement due to climate change that may affect PoCs;
- Implement risk-based plans for monitoring programme implementation and strengthen performance monitoring and reporting by establishing realistic targets and ensuring results achieved are adequately supported; and
- Strengthen supervisory controls over financial and procurement functions and provide training to technical and financial approvers of transactions to ensure they are adequately supported.

UNHCR accepted the recommendations, has implemented one of them and has initiated actions to implement the remaining three. Actions needed to close the recommendations are included in Annex 1.

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#### Audit of the Multi-Country Office in Australia for the Office of the United Nations High Commissioner for Refugees

#### I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of the Multi-Country Office in Australia (hereinafter referred to as the Office) for the Office of the United Nations High Commissioner for Refugees (UNHCR).

2. The Office was established in 1983 to provide refugees, asylum seekers and other persons of concern (PoCs) with protection and humanitarian assistance. As part of UNHCR's regionalization and decentralization process in 2020, it was designated as a Multi-Country Office, with the responsibility of protecting and promoting refugee rights in the region covering Australia, New Zealand, Cook Islands, Federated States of Micronesia, Fiji, Kiribati, Marshall Islands, Nauru, Niue, Palau, Papua New Guinea, Papua New Guinea, Samoa, Solomon Islands, Tonga, Tuvalu and Vanuatu.

3. As of 31 October 2021, there were 165,748 reported PoCs in the region, with 84 per cent of them in Australia and New Zealand while 16 per cent (27,190) were in the Pacific Island countries. Australia, New Zealand and 6 of the 14 Pacific Island countries namely Papua New Guinea, Nauru, Samoa, Fiji, Solomon Islands and Tuvalu are signatories to the 1951 Convention and 1967 Protocol. However, the protection space in the region has been shrinking primarily due to increasingly strict government policies.

4. The Office's priority in Australia and New Zealand was to strengthen the favourable protection environment through advocacy and legislative support initiatives. Its priorities with regard to the Pacific Islands were to: (i) support governments in refugee status determination (RSD) procedures and development of national refugee policies; (ii) deliver capacity building interventions to governments on international refugee protection; and (iii) advocate for the expansion of the protection space for PoCs. It also distributed cash assistance and non-food items to PoCs on a limited scale.

5. The Office was headed by a Representative at the D-1 level. It had two professionals, four national officers, six general service staff, and four affiliate personnel. The Office was based in Canberra and UNHCR did not have any national offices or staff presence in the other locations. The Office recorded total expenditure of \$4.2 million in 2019 and 2020 as shown in Chart 1, with 90 per cent spent on salaries and administration costs, and 10 per cent on operations.



#### Chart 1: Expenditure in 2019 and 2020

Source: UNHCR Power BI Country Financial Reports

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 the Office in managing its mandated activities.

8. This audit was included in the 2021 risk-based work plan of OIOS at the request of the UNHCR Regional Bureau for Asia and the Pacific, considering its new role within the region.

9. OIOS conducted this audit from March to May 2021. The audit covered the period from 1 January 2019 to 31 December 2020. Based on an activity-level risk assessment, the audit covered: (a) fair protection process and documentation; (b) favourable protection environment and government relations; (c) programme monitoring and reporting; (d) financial tracking, reporting and controls; and (e) cash-based interventions (CBIs).

10. The audit methodology included: (a) interviews with key personnel, (b) review of relevant documentation, (c) analytical review of data, including financial data from Managing for Systems, Resources and People (MSRP), the UNHCR enterprise resource planning system, and performance data from FOCUS, the UNHCR results-based management system, and (d) sample testing of controls through the review of 38 payment vouchers worth \$328,694. The audit was conducted remotely due to travel restrictions caused by COVID-19.

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

#### III. AUDIT RESULTS

#### A. Fair protection process and documentation

Need to strengthen reception conditions and access to status determination processes

12. The governments in the region were responsible for ensuring that the conditions of reception arrangements of PoCs met international standards as they waited for their status to be determined. The Office monitored the conditions under which PoCs were held in detention centres and where gaps were identified, made recommendations to respective authorities to improve them. In the region, most governments were responsible for RSD, apart from some Pacific Island countries where UNHCR assessed refugee status claims. In Fiji, Papua New Guinea and Vanuatu, while governments were responsible for RSD, UNHCR provided guidance and assistance to national officials undertaking the process. For instance, in Fiji, the immigration authorities conducted registration interviews followed by RSD assessments conducted by the Office. The Office spent \$1.26 million on fair protection processes in the period under audit.

13. For 2019 and 2020, the Office had included in its work plan the objectives of improving: (a) reception conditions for arriving and detaining PoCs; and (b) the quality and access by PoCs to status determination procedures. However, the Office informed that due to capacity constraints (including a 23 per cent vacancy rate) and the COVID-19 pandemic, it was challenged in meeting these objectives. The Office was working on increasing its capacity to achieve its objectives by filling vacancies, using affiliate workforce personnel and internally diverting resources from core positions such as external relations.

#### Reception conditions

14. Normally, asylum seekers arriving by sea to Australia were held in a detention facility and later transferred to locations under an offshore transfer arrangement with Papua New Guinea and Nauru. As of 31 December 2020, there were 1,513 persons in immigration detention facilities, 1,276 of whom were in Australia. Also, 426 of these PoCs had been in detention centres for more than two years, with the other 1,087 for up to two years.

15. As part of the Office's plan to improve reception conditions, it conducted on-site visits to detention centres in Australia and four visits to centres in Papua New Guinea, but none to Nauru as visas were not granted for UNHCR officials despite repeated requests. In 2020, the COVID-19 pandemic impacted the ability of the Office to conduct visits due to travel restrictions and no access was permitted to centres in Australia. However, from previous years' visits and reports of other humanitarian actors, OIOS noted that those residing in centres were provided limited access to communal or outdoor facilities. Also, although hotels were temporarily repurposed as alternative detention centres for short periods, many PoCs stayed in government facilities for long periods, which had a negative impact on their health and wellbeing.

16. The Office had identified the risk of inadequate reception conditions in its risk register and developed treatment plans to address them including advocating with governments in the region for better conditions in centres. However, the Office informed of the continuing challenges experienced in interacting with governments to improve conditions. Following the audit, the Office drafted a detention centre monitoring plan aimed at strengthening its oversight over centres. It anticipated that the plan would be implemented once the COVID-19 restrictions are lifted.

#### Refugee status determination

17. The Office conducted: (a) advocacy on policy developments to mitigate protection risks to PoCs; (b) provided training and capacity building to governments on refugee policy; and (c) reviewed immigration legislation alongside the Pacific Immigration Development Community.

18. The timely processing of RSD applications in Australia was impacted by its restrictions to the 1951 Convention on the definition of refugees as well as other requirements, including access to legal representation, which increased the risk of refoulement. While the Office has continually advocated for fair and efficient asylum procedures, certain groups of PoCs were unable to access the territory due to restrictions in legislation. The Office reported that this had impacted more than 1,200 PoCs in the country. In New Zealand, RSD procedures were aligned to international law and the Office had supported a national review of RSD procedures to be implemented in late 2020. However, due to the COVID-19 situation, the implementation of the resultant recommendations was delayed, but OIOS was advised that they have now been implemented. The Office maintained open and positive relations with key government officials, particularly in promoting fair and efficient RSD procedures.

19. OIOS was informed that the Office's effectiveness in improving access by PoCs to RSD was constrained by complex political and regional influences. However, the Office had not developed and thus implemented procedures to guide its engagement with relevant stakeholders on reception, RSD and detention monitoring. Instead, the Office followed the standard UNHCR global policy on detention monitoring in situations where PoCs were deprived of their liberty and RSD procedural standards, which did not reflect the unique context in the region. Consequently, there was a need for the Office to develop regional-specific guidance to assist staff in responding effectively to the unique risks the Office was facing.

#### (1) The UNHCR Multi-Country Office in Australia should develop procedures to guide staff in their monitoring responsibilities and thereby facilitate improvement of: (i) reception

conditions for persons of concern upon their arrival and during their detention; and (ii) their access to status determination procedures.

UNHCR accepted recommendation 1 and stated that the UNHCR Office in Australia had developed standard operating procedures on registration and RSD to ensure compliance with global standards. These documents were informed by mapping of the practices in all Pacific region countries and shared with the Regional Bureau for Asia for review.

#### **B.** Favourable protection environment and government relations

#### Restrictive protection risks in the region needed to be addressed

20. The Office's strategic engagement priorities (2019-2021) for Australia, New Zealand and the Pacific Islands included supporting the development of national policy legislation for a protection environment favourable to PoCs. The Office received limited cooperation from the governments in the region, which had an impact on the support being provided. In this regard and in support of the Office, the UNHCR Assistant High Commissioner for Protection visited Australia in February 2021 and held meetings with staff and operational partners on the UNHCR's mandate and shared responsibility of governments to protect PoC rights.

#### Statelessness

21. The Governments of Australia and New Zealand and civil society actors made six and two pledges respectively at the Global Refugee Forum in February 2019. However, there had been limited progress in achieving the six actions of the Global Action Plan to End Statelessness (2014-2024). The slow progress impacted governments' ability to: (a) identify stateless people for protection; (b) resolve existing situations of statelessness and prevent the emergence of new cases; (c) ensure birth registration to prevent statelessness; and (d) improve quantitative and qualitative data on stateless populations.

22. The Office did not have reliable data on the number of PoCs (including stateless individuals) in the Pacific Island countries for planning its protection interventions. The Office informed that it had not yet negotiated data sharing agreements with governments due to the small number of PoCs in the Pacific Island countries and lack of adequate systems in place by governments and their capacity to collate and provide relevant data. The Office was also unable to fully implement capacity building activities of immigration/customs/border officials so they could identify and provide legal assistance to individuals with statelessness risks in some Pacific Island countries.

#### Climate change

23. Pacific Island countries were most at risk of having displacements caused by rising sea levels. However, the impact of climate change and natural disaster displacement within the region were ranked as medium risk in the risk register, with related activities not prioritised in the Office's operations plan. At the country level, plans to assess, identify, monitor and respond to risks of displacements due to climate change and related disasters in 2020 were not implemented due to limited resources.

24. The Office's February 2020 scoping paper on "UNHCR climate change and sudden-onset disaster displacement in Pacific Island countries" outlined four possible areas of work on climate change and disaster displacement in the 16 Pacific Island countries. However, the Office needed guidance from the Regional Bureau on its role in responding to the high assessed risk of disaster and climate-related displacement issues. Moreover, the Office's limited involvement in climate change and natural disaster

response planning sessions at the regional level was a missed opportunity to influence policy regarding the protection of PoCs in such situations.

(2) The UNHCR Multi-Country Office in Australia, in collaboration with the Regional Bureau of Asia and Pacific, should develop an action plan to address: (i) protection gaps related to statelessness and collect and validate related data on persons of concern in the region; and (ii) risks arising from possible displacement due to climate change that may affect persons of concern.

UNHCR accepted recommendation 2 and stated that as part of the 2022 planning, the Office had fully elaborated outputs related to protection gaps in statelessness, refoulement, and climate-change related displacement. A mapping exercise to establish UNHCR entry points to policy and operational cross-border disaster and climate-elated displacement issues in the Pacific was drafted and refined further after discussions with UNHCR Headquarters in September 2021. This exercise would inform a Plan of Action for the Pacific in 2022 under UNHCR's Strategic Framework for climate action. Furthermore, the UNHCR Division of International Protection entered into a partnership with an operational partner on statelessness in consultation with the Office. The joint workplan includes collaboration on a 3-year project to increase qualitative and quantitative data on statelessness in Australia. Additionally, the Office converted the GL-5 position from the solutions team into a GL-7 Senior Information Management Associate to enhance data management and quality, including collaboration with states. The Bureau trained the incumbent on stateless data reporting on 13 December 2021.

#### C. **Programme monitoring and reporting**

#### Programme monitoring and reporting needed strengthening

25. The Office selected 33 impact indicators and 34 output indicators for monitoring and reporting performance in FOCUS. For 2019, the Office did not meet 46 and 53 per cent of its output and impact indicators respectively. Performance reduced further in 2020, with only 27 and 52 per cent of its impact and output indicators reported as achieved. Aspects under which targets were not met for Australia and New Zealand in 2020 included: (a) the Office's supervision of their RSD processes; (b) the number of RSD advocacy interventions conducted; (c) capacity building of Government RSD staff; and (d) provision of commentaries on legal acts and drafts. For Papua New Guinea and other Pacific Island countries in the region, targets were not met regarding: (a) number of stateless persons identified; (b) percentage of PoCs in need submitted for resettlement; and (c) extent to which asylum seekers had access to RSD procedures.

26. The Office attributed its underperformance to factors beyond its control, including countries in the Pacific region not prioritizing programme implementation due to more pressing national priorities, restricted resettlement quota from the third countries, and limited staff capacity as well as restrictions due to COVID-19 lockdown. Nevertheless, the Office had not taken steps to adjust its targets to make them more realistic in the context of its operating environment and to measure them more realistically.

27. In planning its monitoring activities, the Office's monitoring did not consider that most of the indicators that were not achieved related to issues in the Pacific Island countries where UNHCR is not present and thus prioritize them accordingly. Therefore, the Office needed to reinforce its monitoring to identify and address protection risks to PoCs. For instance, out of the 68 programme performance missions conducted by the Office in the audit period, 47 (69 per cent) were in Australia and New Zealand and only 21 (31 per cent) were in the Pacific Island countries. The frequency of monitoring visits was not guided by risk assessments of relevant countries, with less monitoring conducted in countries that had limited national capacity and no UNHCR presence.

28. OIOS' review of FOCUS identified eight indicators that had significantly higher results than established targets (within a range of 103 to 600 per cent) in 2019. For instance, targets related to: (a) the number of advocacy interventions made was 378 per cent; and (b) the number of persons trained was reported at 600 per cent. Considering the large variances between established targets and actuals achieved, there was a need for the Office to review the reasonableness of targets set and check accuracy of performance achieved, as it was not always adequately supported. The Office explained that it collected data used for its monitoring from different channels, including regional governments, the United Nations Country Teams, non-governmental organizations, media, and legislative and judicial proceedings within the region. However, the Office did not have processes for verifying and validating the accuracy of this data prior to consolidating it for reporting in FOCUS. Complete and accurate data is needed for establishing future realistic targets for programme performance measurement and decision making.

# (3) The UNHCR Multi-Country Office in Australia should (i) implement risk-based plans for monitoring programme implementation; and (ii) strengthen performance monitoring and reporting by establishing realistic targets and by validating and supporting results achieved prior to reporting them in FOCUS.

UNHCR accepted recommendation 3 and provided copies of an impact and performance monitoring plan for 2021 and a risk-based priority mission plan for 2022. It also stated that to strengthen data collection and performance monitoring and COMPASS based reporting, the Office, in June 2021, had: (i) relocated the post of the Protection Officer (P-3) to Port Moresby, Papua New Guinea and upgraded the Senior Protection Assistant position (GS-5) in Canberra to a Senior Information Management Associate (GS-7).

#### **D.** Financial tracking, reporting and controls

Need to strengthen oversight over financial management and review the Office structure

29. The Office processed 1,142 payment vouchers worth \$2.5 million in the audit period. It conducted monthly bank reconciliations and prepared monthly and end-of-year reports to UNHCR Headquarters in a timely manner. The audit reviewed a sample of 38 purchase orders totalling \$328,694 to assess the adequacy and effectiveness of controls over procurement and payment processing in MSRP.

30. Controls needed to be strengthened, as the Office had one staff member (national Finance Associate) responsible for maintaining accounting records, supporting payment of cash-based initiatives, collecting quotations, evaluating bids, receiving low-value purchases, and maintaining petty cash. This meant that functions were not adequately segregated, and there was insufficient evidence of supervisory review. For instance, the technical approvers and bank signatories did not review supporting documents prior to approving transactions for payment in MSRP. The audit noted that 6 of the 38 purchase orders reviewed totalling \$39,504 did not have supporting documents.

31. The Office also had a long outstanding item dating from 2012 from the closed Papua New Guinea Country Office. The then Papua New Guinea operation transferred PGK 69,602 (\$28,761) to the Department of Provincial and Local Government Affairs for supporting the West Papuan refugees in the country. The Office stated that this money was not used for intended activities. Despite repeated reminders sent to the Papua New Guinea Government, the money was never refunded. Whilst the audit was in progress, the Office, with the help of the Regional Bureau for Asia and the Pacific, initiated the process to resolve this open item through recovery and/or write-off. Thus, OIOS has not made any recommendation on the issue.

## (4) The UNHCR Multi-Country Office Australia should strengthen supervisory controls over financial and procurement functions and provide training to technical and financial approvers of transactions to ensure they are adequately supported.

UNHCR accepted recommendation 4 and stated that to enable better segregation of duties and strengthen the supervisory review of transactions, the Office, effective from 1 April 2022, would upgrade the Finance Associate (GL6) position to GL-7 and create a Senior Administrative Associate position (GL-5). A refresher course for staff involved in approving and processing financial transactions had been arranged in order to strengthen their financial management capacity.

#### E. Cash based interventions

The Office improved the monitoring arrangements over the CBI programme

32. In 2019-2020, the Office disbursed \$76,470 under the CBI programme to 19 individuals in Papua New Guinea, Fiji and Samoa. Since UNHCR had no presence in the Pacific Islands countries, the distribution of cash was done through third parties including other United Nations agencies. The type of assistance included monthly welfare assistance, education bursaries, citizenship fees, and self-reliance grants. OIOS review of 25 CBI vouchers totalling \$28,930 showed that the Office: (i) was unable to verify documents provided as part of eligibility assessments due to the COVID-19 travel restrictions; (ii) did not conduct any on-site distribution monitoring of CBI programme beneficiaries to ensure proper programme implementation; and (iii) had contrary to its standard operating procedures, effected payments to PoCs when their refugee status was under appeal. While the audit was in progress, the Office obtained the beneficiary documents, attested them, and strengthened monitoring controls by ensuring third-party reports on cash support disbursement. Therefore, no recommendations are made in this regard.

#### **IV. ACKNOWLEDGEMENT**

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

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

#### STATUS OF AUDIT RECOMMENDATIONS

#### Audit of the Multi-Country Office in Australia for the Office of the United Nations High Commissioner for Refugees

| Rec.<br>no. | Recommendation  | Critical <sup>1</sup> /<br>Important <sup>2</sup> | C/<br>O <sup>3</sup> | Actions needed to close recommendation   | Implementation<br>date <sup>4</sup> |
|-------------|---|---|----------------------|--|-------------------------------------|
| 1           | The UNHCR Multi-Country Office in Australia<br>should develop procedures to guide staff in their<br>monitoring responsibilities and thereby facilitate<br>improvement of: (i) reception conditions for persons<br>of concern upon their arrival and during their<br>detention; and (ii) their access to status determination<br>procedures.   | Important   | С                    | Action completed   | Implemented.                        |
| 2           | The UNHCR Multi-Country Office in Australia, in collaboration with the Regional Bureau of Asia and Pacific, should develop an action plan to address: (i) protection gaps related to statelessness and collect and validate related data on persons of concern in the region; and (ii) risks arising from possible displacement due to climate change that may affect persons of concern. | Important   | Ο                    | Receipt of evidence of a plan of action that<br>addresses: (i) climate change risks in the Pacific<br>in 2022 under UNHCR's Strategic Framework<br>for climate action; and (ii) protection gaps related<br>to statelessness in the region. | 31 December<br>2022                 |
| 3           | The UNHCR Multi-Country Office in Australia<br>should (i) implement risk-based plans for monitoring<br>programme implementation; and (ii) strengthen<br>performance monitoring and reporting by establishing<br>realistic targets and by validating and supporting<br>results achieved prior to reporting them in FOCUS.  | Important   | 0                    | Receipt of evidence of realistic performance<br>targets and procedures to validate the results<br>reported in COMPASS  | 31 December<br>2022                 |
| 4           | The UNHCR Multi-Country Office Australia should<br>strengthen supervisory controls over financial and<br>procurement functions and provide training to<br>technical and financial approvers of transactions to<br>ensure they are adequately supported.   | Important   | Ο                    | Receipt of evidence that the Finance Associate<br>post has been upgraded and a Senior<br>Administrative Associate installed.   | 1 April 2022                        |

<sup>&</sup>lt;sup>1</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>&</sup>lt;sup>2</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>&</sup>lt;sup>3</sup> Please note the value C denotes closed recommendations whereas O refers to open recommendations. <sup>4</sup> Date provided by UNHCR in response to recommendations.

## **APPENDIX I**

## **Management Response**

#### **Management Response**

#### Audit of the Multi-Country Office in Australia for the Office of the United Nations High Commissioner for Refugees

| Rec.<br>no. | Recommendation   | Critical <sup>5</sup> /<br>Important <sup>6</sup> | Accepted?<br>(Yes/No) | Title of<br>responsible<br>individual                                       | Implementation<br>date | Client comments  |
|-------------|--|---|-----------------------|---|------------------------|--|
|             | The UNHCR Multi-Country Office in<br>Australia should develop procedures to<br>guide staff in their monitoring<br>responsibilities and thereby facilitate<br>improvement of: (i) reception conditions<br>for persons of concern upon their arrival<br>and during their detention; and (ii) their<br>ccess to status deermination procedures. | Important   | Accepted              | Senior<br>Protection<br>Officer /<br>Senior Durable<br>Solutions<br>Officer | Fully<br>Implemented   | <ul> <li>The Office welcomes the adjustment to the Recommendation taking into account the progress update of 5 October 2021. Comprehensive action was taken to close the draft Recommendation between July and December 2021 as follows, supporting the fulfilment of the current formulation of the Recommendation:</li> <li>Action: A detention plan of action has been finalised along with guidance documents.</li> <li>Action: <ul> <li>Registration Standard Operating Procedures have been developed and shared with the Bureau for review on 11 June 2021. Training on Registration SoPs was conducted on 13 and 16 August 2021.</li> <li>Refugee Status Determination Procedures have been shared with the Bureau, finalized and currently being implemented. A training on the SoPs was</li> </ul> </li> </ul> |

<sup>&</sup>lt;sup>5</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>&</sup>lt;sup>6</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.

| Rec.<br>no. | Recommendation   | Critical <sup>5</sup> /<br>Important <sup>6</sup> | Accepted?<br>(Yes/No) | Title of<br>responsible<br>individual                    | Implementation<br>date | Client comments  |
|-------------|--|---|-----------------------|--|------------------------|--|
|             |  |   |                       |  |                        | <ul> <li>conducted on 17 September 2021.</li> <li>A plan of action plan has been drafted to ensure compliance with 2020 RSD standards and updated on regular basis (including anti-fraud measures)</li> <li>A mapping of the practices and point of contact in each Pacific country was undertaken to inform the document.</li> </ul>  |
|             |  |   |                       |  |                        | <ul> <li>Actions <ul> <li>A fraud action plan was prepared and updated since the last report with actions taken including:</li> <li>Training on RSD (completed, see above)</li> <li>Training on Registration (completed, see above)</li> <li>Training on Data protection was conducted for all staff on 10-11 August 2021</li> <li>Anti-Fraud SoPs were developed</li> <li>Registration and RSD SoPs developed (see above)</li> <li>Review of the file management procedure was completed on 23 July 2021</li> </ul></li></ul> |
| 2           | The UNHCR Multi-Country Office in<br>Australia, in collaboration with the<br>Regional Bureau of Asia and Pacific,<br>should develop an action plan to address: (i) | Important   | Accepted              | Deputy<br>Representative,<br>Senior Durable<br>Solutions | 31 December<br>2022    | The Office has implemented the Recommendation as follows:<br><i>Actions:</i> As part of the 2022 planning  |
|             | protection gaps related to statelessness and   |   |                       | Officer, Senior  |                        | exercise, the Office fully elaborated  |

| Rec.<br>no. | Recommendation   | Critical <sup>5</sup> /<br>Important <sup>6</sup> | Accepted?<br>(Yes/No) | Title of<br>responsible<br>individual | Implementation<br>date | Client comments   |
|-------------|--|---|-----------------------|---------------------------------------|------------------------|---|
|             | collect and validate related data on persons<br>of concern in the region; and (ii) risks<br>arising from possible displacement due to<br>climate change that may affect persons of<br>concern. |   |                       | Protection<br>Officer                 |                        | outputs related to protection gaps<br>identified by the auditors in all areas<br>mentioned including statelessness,<br>refoulement, and climate change<br>related displacement.   |
|             |  |   |                       |                                       |                        | Actions: A mapping exercise to<br>establish UNHCR entry points to<br>policy and operational cross-border<br>disaster and climate related<br>displacement issues in the Pacific was<br>drafted and refined further to<br>discussions with Headquarters in July<br>2021. Based on feedback and further<br>consultation with partners, findings<br>were presented and accepted by the<br>Office management in September<br>2021. This exercise will inform a Plan<br>of Action for the Pacific in 2022 as<br>envisaged under Objective 2.3.8<br>under UNHCR's Strategic<br>Framework for Climate Action. |
|             |  |   |                       |                                       |                        | The Office contributed to a draft<br>report led by the Division of<br>International Protection " <i>The Nexus</i><br>between Climate Change,<br>Displacement and Statelessness: The<br>Role of UNHCR" which concluded<br>that displacement and the risk of<br>statelessness is not unique to, or<br>inevitable for small-island States<br>affected by sea-level rise.   |
|             |  |   |                       |                                       |                        | With respect to the second part of the Recommendation (collect and validate data on persons of concern  |

| Rec.<br>no. | Recommendation | Critical <sup>5</sup> /<br>Important <sup>6</sup> | Accepted?<br>(Yes/No) | Title of<br>responsible<br>individual | Implementation<br>date | Client comments  |
|-------------|----------------|---|-----------------------|---------------------------------------|------------------------|--|
|             |                |   |                       |                                       |                        | <i>in the region</i> ) the following action has been taken to resolve data gaps:   |
|             |                |   |                       |                                       |                        | <ul> <li>PoCs data in the Pacific, including stateless refugees, is recorded in ProGres as per the Registration SOPs. This includes data on Stateless refugees;</li> <li>Persons at risk of statelessness are not PoCs unless so determined. The mapping exercise for the Pacific mentioned in the draft DAR of June 2017 at para.43 and evidenced as part of the Audit at that time, took stock of the circumstances/gaps that may lead to risk of statelessness including factors such as gender discrimination and birth registration.</li> </ul> |
|             |                |   |                       |                                       |                        | • The Division of International<br>Protection entered into a<br>partnership with Peter McMullin<br>Centre on Statelessness in<br>consultation with the Office. The<br>joint workplan includes<br>collaboration on a 3-year project<br>to increase qualitative and<br>quantitative data on statelessness<br>in Australia.   |
|             |                |   |                       |                                       |                        | • A GL5 position from the solutions team was converted into a GL7 Senior Information   |

| Rec.<br>no. | Recommendation   | Critical <sup>5</sup> /<br>Important <sup>6</sup> | Accepted?<br>(Yes/No) | Title of<br>responsible<br>individual   | Implementation<br>date | Client comments   |
|-------------|--|---|-----------------------|---|------------------------|---|
|             |  |   |                       |   |                        | Management Associate to<br>enhance data management and<br>quality, including in<br>collaboration with states. The<br>incumbent was trained by the<br>Bureau on stateless data<br>reporting on 13 December 2021.<br>We thereby consider this part of the<br>recommendation fully implemented.  |
| 3           | The UNHCR Multi-Country Office in<br>Australia should (i) implement risk-based<br>plans for monitoring programme<br>implementation; and (ii) strengthen<br>performance monitoring and reporting by<br>establishing realistic targets and by<br>validating and supporting results achieved<br>prior to reporting them in FOCUS. | Important   | Yes                   | Deputy<br>Representative,<br>Senior<br>Protection<br>Officer,<br>Senior Durable<br>Solutions<br>Officer | 11 October 2021        | The Office has developed an impact<br>monitoring plan and performance<br>monitoring plan for 2021 as per 2021<br>planning/implementation guidance<br>using the Performance Monitoring<br>Plan DI (Option 1) template. From<br>2022 onwards the Office will use the<br>Monitoring & Evaluation module of<br>Compass.<br>While MCO's efforts (including   |
|             |  |   |                       |   | 31 December<br>2022    | while MCO's efforts (including<br>missions) have not been equally<br>targeted to the 16 countries under its<br>area of responsibility, the balance of<br>efforts is in line with where PoCs are<br>mostly located. As of 30 June 2021,<br>out of the 27,048 PoCs reported as<br>being in a Pacific Island country,<br>25,974 were in PNG (including<br>14,000 IDPs). Out of the remaining<br>1,074 PoCs in other Pacific<br>countries, 887 were medically<br>evacuated to Australia. As a result<br>there were 184 persons remaining in<br>Pacific island countries. As of 30<br>June 2021, there were 138,085 PoCs |

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|-------------|---|---|-----------------------|---------------------------------------|------------------------|---|
|             |   |   |                       |                                       |                        | in AUL and 2,495 in NZL. Due to<br>this significant imbalance of PoCs<br>spread across the Pacific, MCO<br>protection efforts have been in line<br>with where the majority of PoCs are<br>located.  |
|             |   |   |                       |                                       |                        | The Office has strengthened data<br>collection and performance<br>monitoring and FOCUS/COMPASS<br>reporting through 1) the relocation of<br>P3 Protection Officer to Port<br>Moresby, Papua New Guinea in June<br>2021; 2) upgrading the GS5 Senior<br>Protection Assistant position in<br>Canberra to a GS7 Senior<br>Information Management Associate<br>in June 2021; 3) and will create a new<br>GL5 Senior Admin Assistant position<br>and upgrade the current GL6 Finance<br>Associate position to GL7 effective<br>01.04.2022<br>The Office has also developed a<br>risked-based priority mission plan for |
| 4           | The UNHCR Multi-Country Office<br>Australia should strengthen supervisory<br>controls over financial and procurement<br>functions and provide training to technical | Important   | Yes                   | Deputy<br>Representative              | 15 September<br>2021   | 2022, with the support of Regional<br>Bureau for Asia and the Pacific.<br>With technical support from the<br>Bureau, all staff with roles under the<br>Delegation of Authority Plan<br>(DOAP) participated in a refresher   |
|             | and financial approvers of transactions to<br>ensure they are adequately supported.   |   |                       |                                       | 1 April 2022           | training webinar on 15 September<br>2021 to ensure that staff<br>can effectively perform their roles,<br>and to strengthen financial<br>management capacity.  |

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|-------------|----------------|---|-----------------------|---------------------------------------|------------------------|---|
|             |                |   |                       |                                       |                        | The Office created an additional GL5 Snr Administrative Associate position effective 1 April 2022 to enable better segregation of duties and strengthen supervisory review of transactions. |