



# **INTERNAL AUDIT DIVISION**

## **REPORT 2022/035**

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### **Audit of conduct and discipline function in the United Nations Interim Force in Lebanon and related regional entities**

**While the entities had implemented measures to manage conduct and discipline, there was a need to improve risk management efforts and properly record and assess all reports of alleged misconduct timely**

**2 August 2022  
Assignment No. AP2021-672-01**

# **Audit of conduct and discipline function in the United Nations Interim Force in Lebanon and related regional entities**

## **EXECUTIVE SUMMARY**

The Office of Internal Oversight Services (OIOS) conducted an audit of the conduct and discipline function in the United Nations Interim Force in Lebanon (UNIFIL) and related regional entities. The objective of the audit was to assess the effectiveness of measures implemented by the entities to manage conduct and discipline in the missions. The audit covered the period from 1 January 2018 to 28 February 2022 and included: (i) prevention of misconduct; (ii) enforcement of standards of conduct; and (iii) remedial actions.

The Regional Conduct and Discipline Section (RCDS) in UNIFIL supports, in an integrated framework, the UNIFIL Head of Mission and Force Commander and heads of nine other missions in the region on conduct and disciplinary issues. The entities had implemented several measures to manage conduct and discipline including awareness raising and training, provision of welfare activities and supporting of victims. However, there was a need to improve risk management efforts and to properly record and assess all reports of alleged misconduct in a timely manner.

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

- Strengthen awareness training to ensure guidance on local customs and practices cover risks related to domestic workers and that all newly recruited staff attend the training;
- Ensure RCDS improves its risk management by developing and implementing alternative methods to assess risks of client missions when field visits cannot be conducted and that risks are specific to each mission's circumstances to enable appropriate mitigating responses to be developed;
- Strengthen the confidential reporting mechanism in RCDS to ensure that all allegations of misconduct from the nine regional entities are centrally recorded so that they can be addressed consistently;
- Review allocation of responsibilities in RCDS to ensure that staff are deployed across conduct and discipline functions so that the Section is able to assess allegations of misconduct in a timelier manner;
- Implement a revised communication strategy for RCDS that incorporates building the confidence of staff members in the system for addressing misconduct; and
- Assess the impact of public awareness campaigns to prevent sexual exploitation and abuse and other forms of misconduct and revise the related public information strategy as necessary.

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

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# **Audit of conduct and discipline function in the United Nations Interim Force in Lebanon and related regional entities**

## **I. BACKGROUND**

1. The Office of Internal Oversight Services (OIOS) conducted an audit of the conduct and discipline function in the United Nations Interim Force in Lebanon (UNIFIL) and related regional entities.
2. The core values and principles to be observed by staff are enshrined in the Charter of the United Nations and Standards of Conduct for the International Civil Service<sup>1</sup>. Additional guidance for United Nations field staff is also included in the policy on “Accountability for Conduct and Discipline in Field Missions”<sup>2</sup>.
3. Misconduct refers to breaches of the standards of conduct of the United Nations or failure to comply with the standards of conduct expected of an international civil servant. There are two categories of misconduct: (i) serious misconduct; and (ii) misconduct. Serious misconduct includes sexual exploitation and abuse (SEA), serious and complex fraud, abuse of authority, conflict of interest, any case where there is a risk of loss of life, serious criminal acts, gross mismanagement and waste of substantial resources.
4. The United Nations has a three-pronged strategy to address misconduct: prevention of misconduct, enforcement of United Nations standards of conduct, and remedial action. The Department of Management Strategy, Policy and Compliance is responsible for enforcing the United Nations Standards of Conduct in peacekeeping missions and special political missions and works closely with the Departments of Peace Operations and Peacebuilding and Political Affairs. The Head of Mission, assisted by the Chief of Staff as appropriate, has overall responsibility for maintaining discipline in the field mission. S/he also ensures that information or complaints about possible misconduct are promptly examined and, if necessary, forwarded for investigation.
5. The Regional Conduct and Discipline Section (RCDS) in UNIFIL supports, in an integrated framework, the UNIFIL Head of Mission and Force Commander (HoM/FC) and heads of other missions in the region on conduct and disciplinary issues affecting their staff. These missions are the United Nations Disengagement Observer Force (UNDOF), the United Nations Peacekeeping Force in Cyprus (UNFICYP), the United Nations Truce Supervision Organization (UNTSO), the United Nations Special Coordinator for the Middle East Peace Process (UNSCO), the Office of the United Nations Special Coordinator for Lebanon (UNSCOL), the United Nations Support Mission in Libya (UNSMIL), the Office of the Special Envoy of the Secretary-General for Yemen (OESGY), the Office of the Special Envoy of the Secretary-General for Syria (OSES) and the United Nations Mission in Support of the Hudaydah Agreement (UNMHA).
6. RCDS assists in managing the risks related to conduct and discipline to identify, prevent and respond to misconduct; provides training to peacekeeping personnel on United Nations rules and conduct; designs and implements policies to deter violations of local laws and United Nations regulations and rules; develops and implements measures to raise awareness among the host population; and ensures that all existing policies, procedures and guidelines for dealing with misconduct are appropriately communicated to mission personnel.

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<sup>1</sup> <https://icsc.un.org/Resources/General/Publications/standardsE.pdf>

<sup>2</sup> <https://conduct.unmissions.org/documents-standards>

7. RCDS is headed by a Chief at the P-5 level who reports to the HoM/FC. The chief is supported by four international (2 P-4 and 1 P-3) staff members, one national officer and two military staff officers and by focal points appointed by the heads of the respective missions.
8. Comments provided by UNIFIL are incorporated in italics.

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

9. The objective of the audit was to assess the effectiveness of measures implemented by UNIFIL and related regional entities to manage conduct and discipline in the missions. The audit focused on the three-pronged strategy for addressing conduct and discipline issues in peace operations and addressed three main audit questions:

- a) To what extent have the missions established adequate measures to prevent misconduct?
- b) To what extent have the missions established effective mechanisms for reporting, recording and timely addressing cases of misconduct?
- c) To what extent have the missions taken adequate remedial action in cases of substantiated misconduct?

10. This audit was included in the 2021 risk-based work plan of OIOS due to the immediate and detrimental consequences of some types of misconduct on the victims and other stakeholders. It was also due to the high operational and reputational consequences that conduct and discipline matters may bear to the United Nations.

11. OIOS conducted this audit from October 2021 to April 2022. The audit covered the period from 1 January 2018 to 28 February 2022. Based on an activity-level risk assessment, the audit covered higher and medium risks areas which included: prevention of misconduct, enforcement of standards of conduct and remedial action.

12. The audit methodology included: (a) interview with key personnel, (b) review of relevant documentation, and (c) analytical review of data.

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

## **III. AUDIT RESULTS**

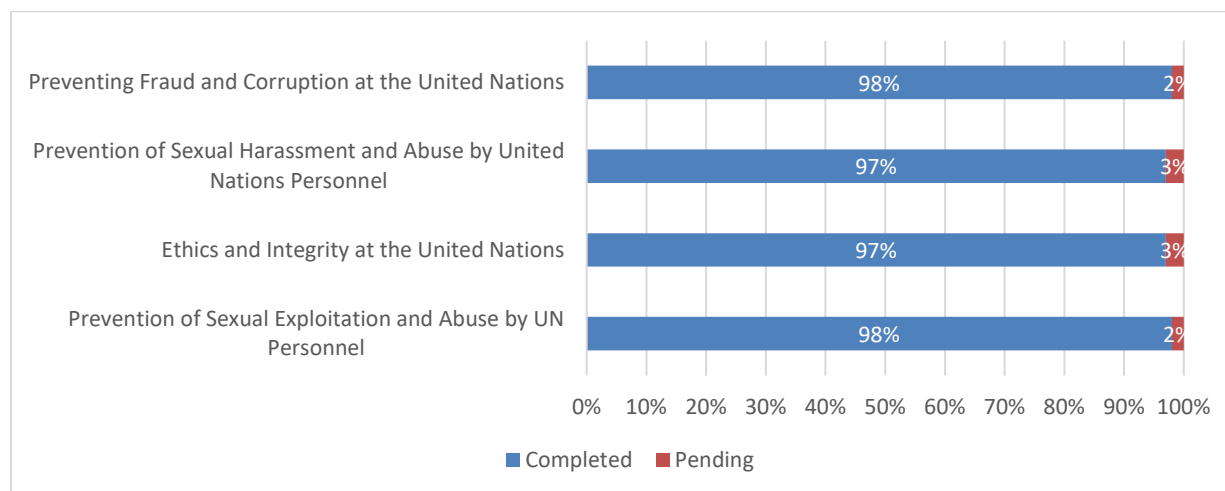
### **A. Prevention of misconduct**

#### Awareness raising and training

14. RCDS communicates and promotes shared values and behavioural expectations mainly through awareness raising and training. As part of the awareness raising efforts, RCDS posted broadcast messages on the UNIFIL intranet and published a video of the HoM/FC speaking on behavioural issues. RCDS also developed and disseminated brochures and leaflets during staff induction trainings to raise awareness on prevention and reporting SEA and displayed posters at various military positions. RCDS also supported the entities for which it has oversight by assisting their focal points in developing broadcast messages and posters.

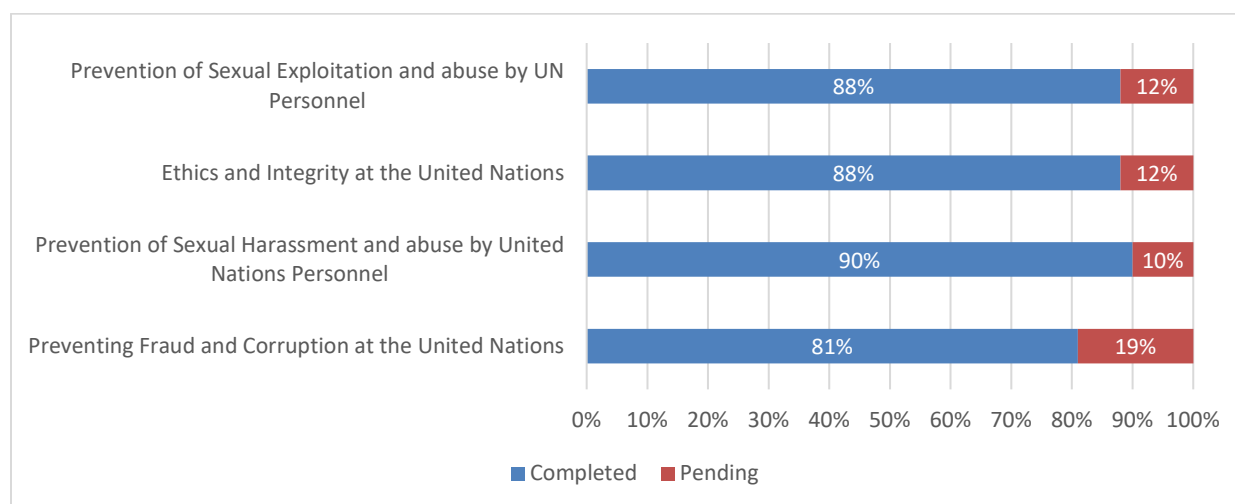
15. There are four mandatory training courses related to ethics and integrity for staff at all levels. Completion rates for these courses are published on management dashboards and the requirement to ensure staff complete them is included in senior managers’ compacts. As of March 2022, an average of 97.5 per cent of staff in UNIFIL and 86.5 per cent of staff in other regional entities had completed the mandatory courses as indicated in Figures 1 and 2.

**Figure 1**  
**Mandatory training compliance as of March 2022 – UNIFIL**



Source: Management dashboard mandatory training data

**Figure 2**  
**Mandatory training compliance as of March 2022 – Other regional entities**



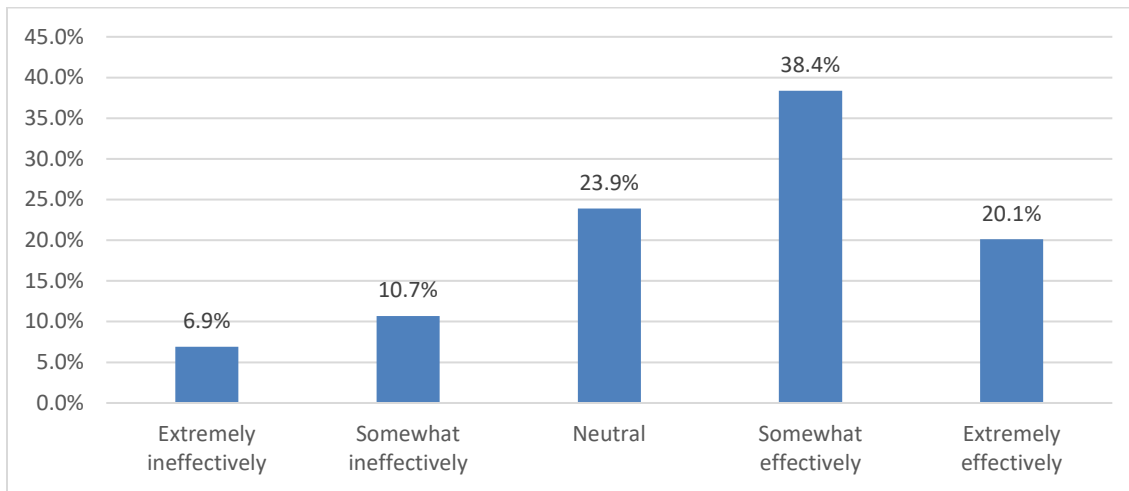
Source: Management dashboard mandatory training data

16. In addition, the UNIFIL Integrated Mission Training Centre and RCDS jointly conducted mandatory induction training to improve the awareness of UNIFIL personnel. The training covered topics such as the applicable standards of conduct in UNIFIL, the need to respect local practices and culture, personal security and safety for United Nations staff, SEA, reporting and addressing misconduct, and what constitutes misconduct and serious misconduct. However, the induction training for civilian staff did not cover some local customs, which could give employers almost complete control over the lives of domestic

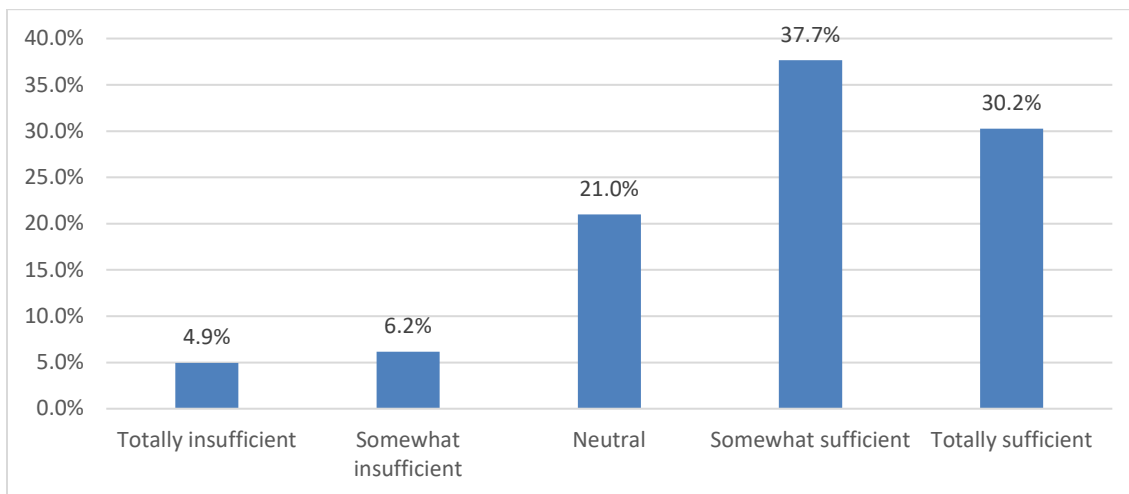
workers, making them vulnerable to all forms of exploitation and abuse. Abuse of domestic workers was also highlighted as a risk factor in the regional risk register, along with non-compliance with private financial obligations. RCDS explained that this was not addressed because the hiring of domestic workers is considered a personal matter. There is a risk that UNIFIL staff would inadvertently perpetuate harmful practices if adequate guidance is not included in the awareness training.

17. Approximately 59 per cent of UNIFIL staff who responded to the OIOS accountability survey conducted in 2020 believed that the standards of ethics and integrity were communicated somewhat or extremely effectively, while the remainder were either neutral or believed that they were communicated somewhat or extremely ineffectively. Sixty-eight per cent of staff felt that training on ethical standards and integrity was sufficient, while 24 per cent were either neutral or felt that it was somewhat or totally inadequate.

**Figure 3**  
Staff perception of how effectively the standards on ethics and integrity are communicated



**Figure 4**  
Staff perception of the degree to which ethics and integrity training has been sufficient



18. A review of the Mission's training records for the period January 2018 to February 2022 showed discrepancies between the number of newly recruited military and civilian personnel who attended mandatory induction training on conduct and discipline and the records maintained by RCDS. This was because RCDS did not have a process to crosscheck the list of participants of the mandatory induction training with the list of newly recruited staff.

**(1) UNIFIL should strengthen awareness training conducted by the Regional Conduct and Discipline Section by ensuring that they: (a) expand guidance on local customs and practices included in the mandatory induction course for staff to cover risks related to domestic workers; and (b) verify that all newly recruited staff attend the training.**

*UNIFIL accepted recommendation 1 and stated that the induction briefing and other related training materials would be revised to reflect risks related to domestic workers under the local customs and practices that may have implications in upholding United Nations standards of conduct, i.e., the “Kafala”, with its possible risks associated with SEA and failing to honour private legal obligations. Also, RCDS would collaborate with the Human Resources Section and Integrated Mission Training Centre to ensure that all newly recruited staff attend induction.*

Improvements needed in the risk management process

19. RCDS carried out risk management activities by conducting field visits, analyzing cases of misconduct at each mission and producing a regional risk register. Field visits to UNIFIL military positions included discussions with the respective contingent commanders and assessment of the social conditions in these positions, while visits to the other regional entities involved assessing the risks of the respective missions. RCDS stated that site visits should ideally be conducted at least once a year. However, during the audit period, RCDS only conducted 20 out of 48 expected visits to military positions, and 8 out of 27 expected visits to the regional entities. RCDS attributed the lower number of visits to the COVID-19 pandemic, problems in obtaining visas and security concerns (see Table 1); however, alternative methods were not developed to conduct risk assessments. OIOS noted that while the pandemic had a negative impact on the Section's ability to conduct site visits, this could not be attributed to the period prior to it, namely 2018 and 2019. Failure to conduct regular site visits could result in risks not being properly identified.

**Table 1**  
**Site visits undertaken by RCDS to regional entities**

No	Mission	Site visits undertaken	Details
1	UNSMIL	2018, 2019	Could not go to Tripoli due to security reasons.
2	UNDOF	None	No site visit conducted during audit period as RCDS officers were denied entry into the host country. Last site visit undertaken in 2017.
3	UNFICYP	2018, 2019	-
4	UNTSO	2017	No site visit conducted during the audit period. Visits were scheduled for 2019 but did not materialize due to visa issues
5	UNSCO	2017	No site visit conducted during the audit period. Visits were scheduled for 2019 but did not materialize due to visa issues
6	UNSCOL	2021	Visits conducted on average twice a year during the audit period
7	UNMHA	2021	First site visit undertaken during 2021 as Mission was added to RCDS portfolio in 2020.
8	OESGY	2021	First site visit undertaken during 2021 as Mission was added to RCDS portfolio in 2020.
9	OSES	2020	New mission, included in 2020.

20. The latest regional risk register was developed in 2020 and RCDS advised that they were working on the 2022 regional risk register. The 2020 risk register showed that risks had been properly identified; however, they were arbitrarily applied to all missions, even though the register contained a provision to



indicate which risks were applicable to which mission. For example, traffic offences due to drink-driving were classified as high risk for all missions, even though this risk was low for UNMHA and OSESGY due to the ban on alcohol in the host country and the fact that there had been no cases of drink-driving at both missions for over four years. In addition, some host countries had national laws setting alcohol limits for driving while others do not. This should be a factor in assessing the risks for drink-driving.

21. Inadequate identification and assessment of the specific risks of each mission may result in implementing mitigating actions that do not apply to that mission, resulting in inefficient use of resources. For example, resources may be used for zero tolerance of drink-driving campaigns, when the focus should have been on other more relevant risks.

**(2) UNIFIL should ensure the Regional Conduct and Discipline Section improves its risk management by: (a) developing and implementing alternative methods to assess risks of client missions when field visits cannot be conducted; and (b) assessing and categorizing risks specific to each mission to enable appropriate mitigating responses.**

*UNIFIL accepted recommendation 2 and stated that it would develop a plan for oversight field visits to ensure all regional footprints are covered and explore creative ways to undertake misconduct risk assessments/management remotely to cater for unforeseen impediments to travelling. Additionally, UNIFIL would develop misconduct risk action plans reflecting the realities and specific needs of each mission, as well as a regional misconduct risk register.*

The Mission vetted all newly onboarded personnel

22. To prevent the re-employment of persons who have been guilty of any form of proven misconduct in the past, in particular sexual harassment and SEA, UNIFIL and related entities conducted mandatory vetting of candidates who were eligible for recruitment. All international civilian staff recruited by UNIFIL during the audit period were vetted by DMSPC at the request of the Mission. For national staff, there was one external recruitment and the staff member was vetted by the Security Section.

Welfare activities in UNIFIL and related entities were satisfactory

23. RCDS is an ex officio member of the UNIFIL Welfare and Recreation Committee. The Committee was required to meet once a quarter but only held 3 out of 16 meetings expected during the audit period due to: the absence of a Chairperson for the Committee for over seven months, preparation of new standard operating procedures and the COVID-19 pandemic. Discussions with RCDS staff and the UNIFIL Welfare Coordinator indicated that welfare and recreation activities were adequate for Mission staff. The camp had a gymnasium, two swimming pools, tennis and squash courts and some restaurants. The Mission also organized occasional activities such as cultural evenings and sporting activities as part of the recreational activities for staff. In addition, due to the nature of the duty station, staff also had access to recreational activities outside the camp.

24. Also, RCDS indicated in its reports on visits to military sites that social and recreational activities were adequate at all sites visited. Recreational facilities included internet and satellite facilities, gymnasiums, canteens with television rooms, organized social events and communal shopping. There were also places of worship for Christian, Muslim and Buddhist faith communities. Although the Mission had not evaluated the impact of its welfare and recreation programme, RCDS felt that it was successful due to the low number of cases of misconduct compared to other missions. Welfare and recreation activities are funded by the Post Exchange (PX), which contributes 2 per cent of its monthly net profits. During the audit period, \$144,726 was allocated to the welfare programme. The funds were used for lifeguard training, purchase of sports equipment and costs related to sports competitions.

25. Interviews with focal points of regional entities revealed that the social and recreational activities were adequate. In UNFICYP, UNSCOL, UNSCO and UNTSO, the environment was similar to UNIFIL where staff had access to recreational activities outside the work environment. In missions where movement was restricted, such as UNDOF, staff had access to fitness and entertainment facilities in the areas where they lived.

## **B. Enforcement of standards of conduct**

### Need to capture all allegations centrally

26. RCDS had established adequate mechanisms in UNIFIL for the confidential reporting of allegations of misconduct, including private rooms, a dedicated telephone line and a dedicated UNIFIL email address to which two staff members, including the Chief, had access. RCDS also had institutional working arrangements with other sections including Security, Transport, the Force Provost Marshal, the Military Personnel Unit (J1) and the Force Conduct and Discipline Officer to deal with and manage incidents involving Mission staff that may or may not constitute misconduct.

27. In the other nine regional entities, the focal points were responsible for receiving and assessing complaints or reports of alleged misconduct. However, there were no corresponding arrangements for dedicated email addresses and telephones, private rooms or institutional sharing of information about possible misconduct within the missions. Therefore, focal points in these missions received allegations of misconduct in person, on their personal emails and telephones, which were not recorded in the Case Management Tracking System. As a result, newly appointed focal points, alternative focal points and RCDS did not have access to historical information on allegations.

28. Focal points in three missions reported that most of the allegations reported to them were administrative in nature. Therefore, they dealt with them at the mission level with no consultations with RCDS, as required by 2013 Advisory on Conduct & Discipline in Field Missions. RCDS had not prioritized the central receipt of allegations in the institutions concerned, leaving the initial assessment of allegations to the personal discretion of the focal points. As a result, missions had no certainty that all allegations of misconduct were properly recorded for further processing and investigation, if necessary.

29. In addition, in six of the nine missions, conduct and discipline focal points also held senior management positions such as chiefs of staff and chiefs of mission support. There was a risk that they may be perceived as inaccessible by some staff due to their seniority, or as conflicted to process some categories of complaints or allegations. RCDS commented that as part of the introductory meetings for its newly appointed Chief, the Section would consult and engage with the respective missions to prepare generic terms of reference for conduct and discipline focal points, including their ideal profile. Therefore, OIOS does not make a recommendation on this issue.

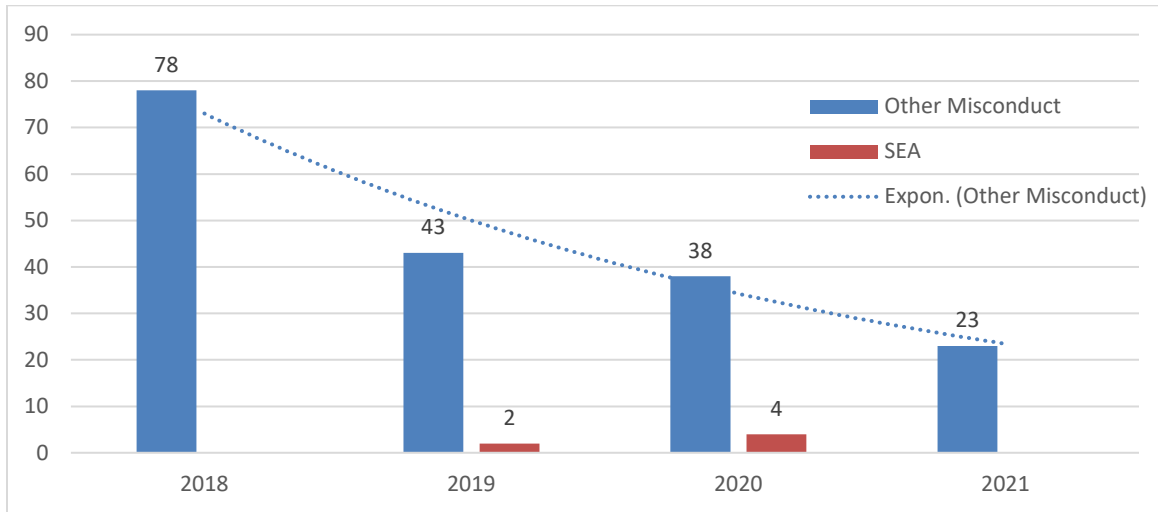
**(3) UNIFIL should strengthen the confidential reporting mechanism for the Regional Conduct and Discipline Section to ensure that all allegations of misconduct from the nine regional entities are centrally recorded so that they can be addressed consistently.**

*UNIFIL accepted recommendation 3 and stated that it would engage the other regional missions to: (a) ensure that private/confidential space is available to receive complaints; and (b) create localized shadow databases for entry of short summaries of allegations of misconduct to ensure that institutional memory is retained and to facilitate handing over from outgoing to incoming conduct and discipline focal points.*

Need to improve timelines for assessment of allegations

30. RCDS received 188 allegations of misconduct during the audit period, 6 of which were related to SEA. There was an overall decrease in the number of reported allegations over the period, as shown in Figure 5.

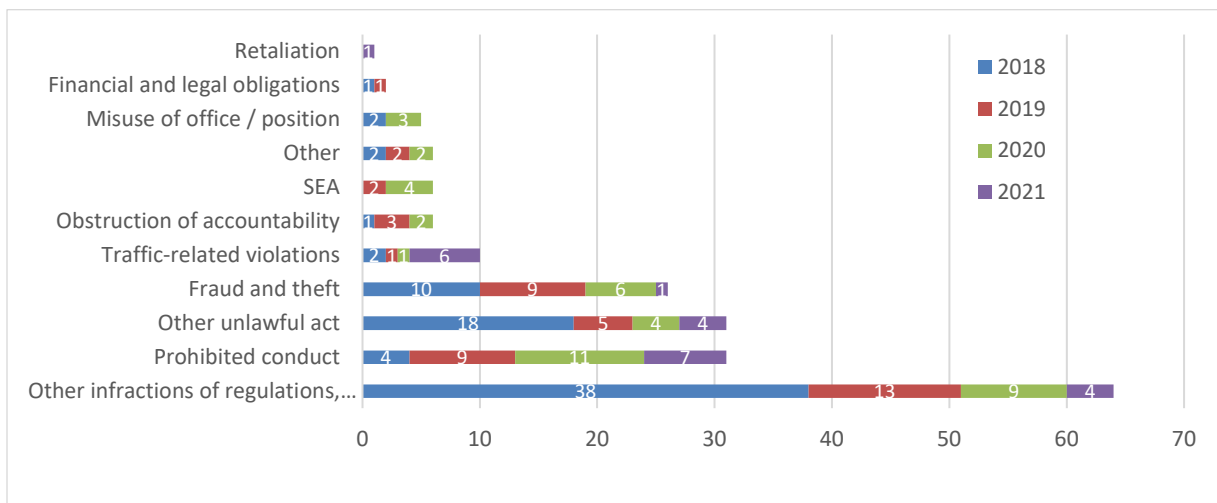
**Figure 5**  
Number of allegations reported to RCDS in 2018-2021



Source: Case Management Tracking System data

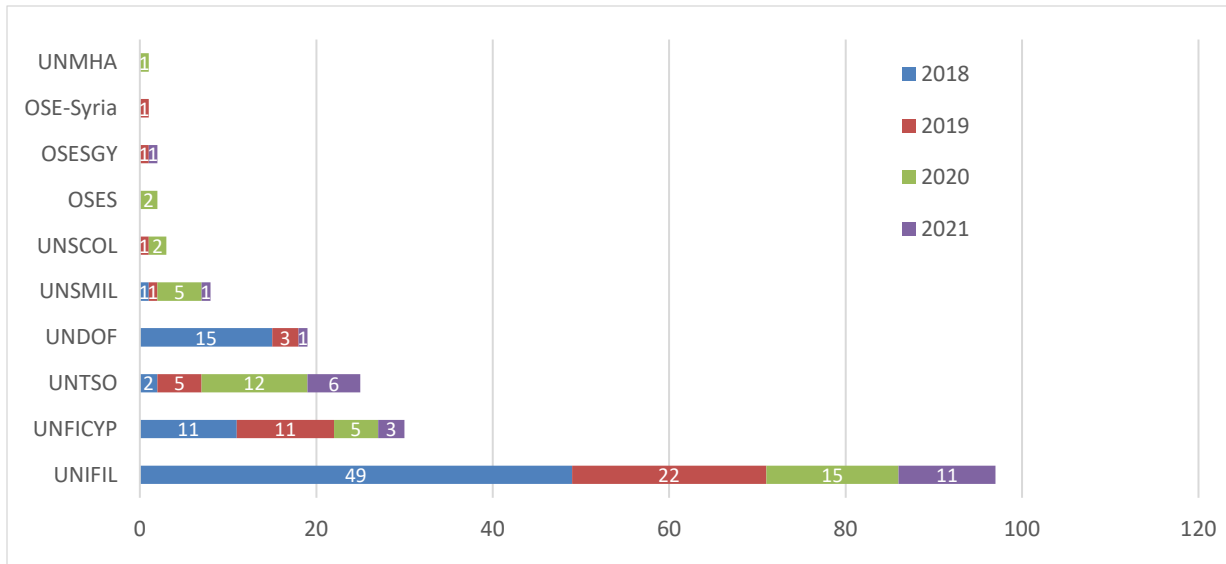
31. Violations of regulations, rules and administrative instructions including prohibited conduct were reported more frequently and together accounted for 50 per cent of allegations in all missions (see Figure 6). Unlawful acts and fraud and theft were the other main types of misconduct, accounting for 30 per cent. The other types accounted for less than 10 per cent and SEA for 3 per cent. At the mission level, UNIFIL accounted for more than 51 per cent of allegations, while allegations from UNFICYP, UNTSO and UNDOF accounted for approximately 10 per cent, as shown in Figure 7.

**Figure 6**  
Prevalence of reported types of misconduct in UNIFIL and regional entities in 2018-2021



Source: OIOS analysis of Case Management Tracking System data on reported allegations

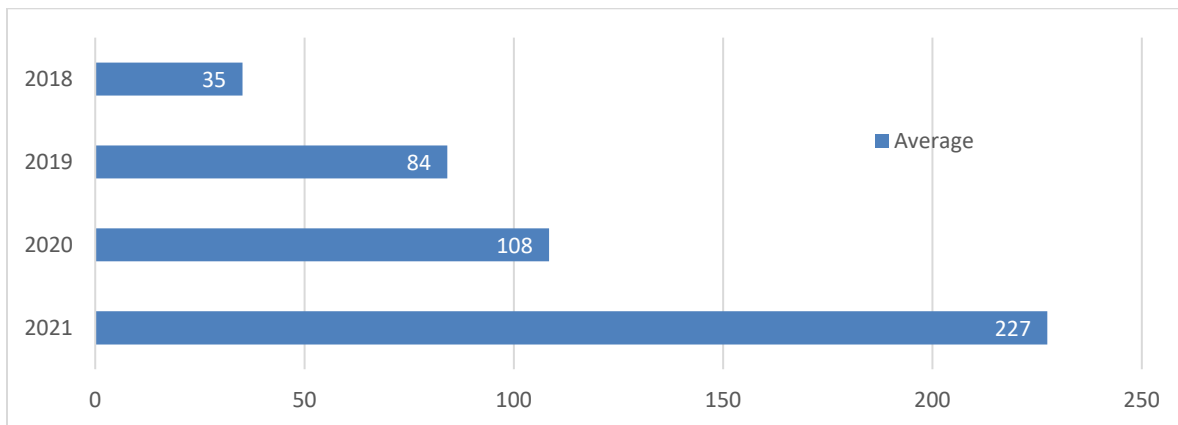
**Figure 7**  
**Number of allegations in UNIFIL and regional entities reported to RCDS in 2018-2021**



Source: Case Management Tracking System

32. During the audit period, RCDS took an average of 111 days to assess allegations before referring them for investigation or action, as opposed to the recommended period of 7 days. In 2021, the average was 227 days as indicated in Figure 8.

**Figure 8**  
**Average number of days for completion of assessment of allegations in 2018 - 2021**



Source: RCDS caseload data

33. This was due to the method of allocation of responsibilities in RCDS, which had implemented a functional division of duties, with staff assigned to the separate pillars of prevention, enforcement and reporting activities. Due to the absence of staff from UNIFIL because of the pandemic in 2020 and 2021, only one staff member was responsible for receiving, processing and assessing allegations and following up with investigating entities. This placed an enormous burden on the staff member who had to process all allegations in a timely manner. As a result, RCDS took an exceptionally long time to complete the assessment of allegations before forwarding them to investigating entities for further processing.

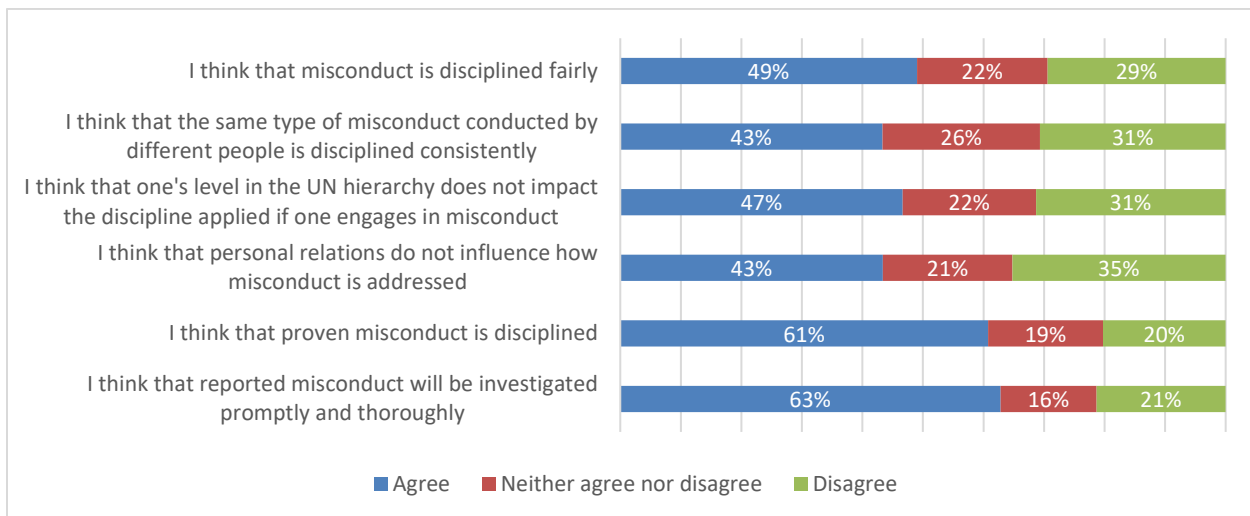
**(4) UNIFIL should review the allocation of responsibilities in the Regional Conduct and Discipline Section to ensure that staff are deployed across conduct and discipline functions so that the Section is able to assess allegations of misconduct in a timelier manner.**

*UNIFIL accepted recommendation 4 and stated that RCDS was already reviewing the functions and capacities of conduct and discipline officers and had started in-house capacity building sessions to enhance cross-cutting capacities for efficient handling and management of allegations/cases of misconduct.*

Need to improve confidence in the system of addressing wrongdoing

34. The OIOS evaluation of organizational culture in peacekeeping operations<sup>3</sup> in 2020 revealed that staff at various levels felt that a culture of impunity was widespread, with senior leaders and managers not adequately enforcing accountability for performance and misconduct. In the 2020 OIOS survey on the accountability system in the United Nations, the majority of UNIFIL staff believed that reported misconduct would be investigated promptly and thoroughly (63 per cent) and that proven misconduct would be disciplined (61 per cent). However, a significant number of staff felt, or were neutral to the view that personal relationships (56 per cent) influenced the way misconduct was handled and that hierarchy and power dynamics (53 per cent) influenced the way discipline was enforced in the Mission as shown in Figure 9. (The response rates from the nine regional entities to the same survey were very low, therefore OIOS did not analyze their results). During the audit period, 85 of the 188 allegations received were substantiated, 37 were closed as being unsubstantiated, 6 were closed without action and 60 were still under review. Mission management addressed substantiated allegations through reprimand, censure, sanction, separation or repatriation.

**Figure 9**  
**UNIFIL staff perceptions of how misconduct is addressed**



Source: 2020 OIOS survey data on the accountability system in the United Nations

35. Although UNIFIL had improved in most areas of the 2021 Staff Engagement Survey<sup>4</sup>, the Survey revealed that staff felt that management did not trust them or that staff at all levels who engage in unethical

<sup>3</sup> Evaluation of the organizational culture in peacekeeping operations (A/75/803)

<sup>4</sup> Since 2017, the Secretariat has conducted global biennial surveys to measure the levels of engagement or emotional commitment that staff members have to the Organization and its goals

behaviour were equally held accountable. Fifteen per cent of respondents were also not confident that United Nations staff would be protected from retaliation for reporting misconduct or cooperating with an authorized audit or investigation. Interviews with UNIFIL staff representatives in the field revealed that staff were concerned about the excessively long timeframes for assessing and investigating cases once an allegation of misconduct had been made.

36. RCDS indicated that this was due to a lack of confidence among staff in the system of addressing misconduct, and a resulting inertia to volunteer information that could lead to a more expeditious assessment of allegations.

**(5) UNIFIL should implement a revised communication strategy for the Regional Conduct and Discipline Section that incorporates building confidence among staff members in the system of addressing misconduct.**

*UNIFIL accepted recommendation 5 and stated that RCDS would engage the HoM/FC to enhance the awareness of UNIFIL personnel on: (a) the United Nations whistleblower policy; (b) confidentiality in handling allegations of misconduct and the extent to which information may be shared with staff members about an investigation or action taken pursuant to ST/AI/2017/1; and (c) the report of the Secretary-General on his practice in disciplinary matters and cases of possible criminal behavior. RCDS would also prepare a one-page summary on the disciplinary process and steps that follow upon receipt of a complaint.*

RCDS was following up on outstanding allegations

37. RCDS had implemented a tracking system to help identify long pending cases and contacted the concerned investigating bodies every three to six months to follow up on the status of investigations. As of February 2022, RCDS had 60 pending cases for eight missions, of which 44 had been pending for more than a year including 31 for more than two years. The time taken to complete investigations was not entirely within the control of RCDS and depended on factors such as the nature of the allegation, the ease of gathering evidence, including the availability of witnesses and the prioritization by the investigating body. Therefore, OIOS did not make a recommendation.

## **C. Remedial action**

The victim assistance mechanism was adequate

38. The United Nations Comprehensive Strategy on Assistance and Support to Victims of Sexual Exploitation and Abuse by United Nations and Related Personnel calls on the United Nations system to assist in a coordinated manner, persons whose needs arise directly from an incident of sexual exploitation or abuse. Such assistance may include medical care, psychosocial support, legal assistance and immediate material needs such as food, clothing and safe shelter.

39. RCDS participated in the United Nations country team network (UNCT) to implement a mechanism to assist victims through the establishment of a Protection from SEA (PSEA) network in Lebanon. UNTSO, UNSCO and UNFICYP were yet to establish a fully functional PSEA network as they did not have formal referral pathways among United Nations entities or a joint action plan funded centrally, as was the case in Lebanon. Restrictions on staff movement and interaction with local communities in UNDOF, UNSCO, UNSMIL, OSES, OSESGY and part of UNTSO areas of operation meant that RCDS and its focal points in these missions did not have active PSEA activities through UNCTs in these areas. RCDS attended all 50 meetings of the PSEA network held during the audit period and offered assistance to

victims in two SEA cases in UNIFIL and OSESGY, but both victims refused this assistance without explanation. In one case of possible SEA, RCDS was unable to locate the alleged victim despite considerable efforts.

40. OIOS concluded that RCDS, in collaboration with UNCT, had established an adequate victim assistance mechanism.

#### Community awareness raising activities needed improvement

41. In 2016, UNIFIL's Office of Strategic Communications and Public Information (SCPI), in consultation with RCDS, developed a communications strategy to combat SEA by United Nations personnel. The strategy included activities such as creating a dedicated corner on the Mission's public website to SEA, communicating on social media to reinforce messages from the Secretary-General and the Head of Mission on the issue, sending multimedia messages reiterating policies relevant to UNIFIL and the local community, and conducting outreach in collaboration with the Civil Affairs Division to reinforce the Mission's policy on transparency and accountability in combating SEA. This strategy also included a section on SEA in a local magazine with contact information for reporting misconduct.

42. However, the strategy has not been revised over time to take into account new and emerging issues such as the new categories of vulnerable populations resulting from the economic crisis affecting the country since 2019. Also, RCDS did not have a similar strategy in the other regional entities. In addition, UNIFIL did not conduct community outreach activities as the Mission felt that SEA was not as widespread compared to other missions, and out of respect for the local culture where such matters are not openly discussed. There was also no functioning community-based grievance mechanism in Lebanon, although the economic crisis and the COVID-19 pandemic posed additional risks to vulnerable populations in the country. RCDS had relied on the PSEA network to find ways to build community-based grievance mechanisms. However, this was delayed due to funding constraints of participating entities that prevented the appointment of a dedicated PSEA coordinator.

43. As a result, there was no effective system in place to raise public awareness of United Nations standards of conduct, how to report misconduct and assistance available to victims. As UNIFIL did not evaluate and assess the impact of its communication strategy, it was not possible to determine whether these measures were effective in preventing misconduct. Moreover, the strategy focused only on SEA and not on misconduct as a whole, thus presenting it as the only type of misconduct that can be reported by members of the public. UNIFIL did not receive any allegations of SEA or other types of misconduct from the PSEA network during the audit period.

**(6) UNIFIL should assess the impact of its public awareness campaigns to prevent sexual exploitation and abuse and other forms of misconduct and revise the related public information strategy as necessary.**

*UNIFIL accepted recommendation 6 and stated that RCDS would collaborate with the Division of Political and Civil Affairs, Gender Affairs and other relevant sections/units with footprints in the community to conduct outreach on the United Nations' zero tolerance policy on SEA, taking into context both the cultural and political sensitivities.*

#### **IV. ACKNOWLEDGEMENT**

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

*(Signed)* Muriette Lawrence-Hume  
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Office of Internal Oversight Services



## STATUS OF AUDIT RECOMMENDATIONS

## Audit of conduct and discipline function in the United Nations Interim Force in Lebanon and related regional entities

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	C/ O <sup>7</sup>	Actions needed to close recommendation	Implementation date <sup>8</sup>
1	UNIFIL should strengthen awareness training conducted by the Regional Conduct and Discipline Section by ensuring that they: (a) expand guidance on local customs and practices included in the mandatory induction course for staff to cover risks related domestic workers; and (b) verify that all newly recruited staff attend the training.	Important	O	Receipt of the revised induction briefing materials and evidence of a mechanism established to verify that all newly recruited staff attend induction training.	30 November 2022
2	UNIFIL should ensure the Regional Conduct and Discipline Section improves its risk management by: (a) developing and implementing alternative methods to assess risks of client missions when field visits cannot be conducted; and (b) assessing and categorizing risks specific to each mission to enable appropriate mitigating responses.	Important	O	Receipt of the plan for oversight field visits, mission risk action plans and a regional misconduct risk register.	31 December 2022
3	UNIFIL should strengthen the confidential reporting mechanism for the Regional Conduct and Discipline Section to ensure that all allegations of misconduct from the nine regional entities are centrally recorded so that they can be addressed consistently.	Important	O	Receipt of evidence of implementation of the localized databases to record misconduct cases.	30 April 2023
4	UNIFIL should review the allocation of responsibilities in the Regional Conduct and Discipline Section to ensure that staff are deployed across conduct and discipline functions so that the Section is able to assess allegations of misconduct in a timelier manner.	Important	O	Receipt of evidence that RCDS staff are deployed across conduct and discipline functions.	31 March 2023
5	UNIFIL should implement a revised communication strategy for the Regional Conduct and Discipline	Important	O	Receipt of evidence of implementation of the revised communication strategy.	31 October 2022

<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>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.

<sup>7</sup> Please note the value C denotes closed recommendations whereas O refers to open recommendations.

<sup>8</sup> Date provided by UNIFIL in response to recommendations.

## STATUS OF AUDIT RECOMMENDATIONS

## Audit of conduct and discipline function in the United Nations Interim Force in Lebanon and related regional entities

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	C/ O <sup>7</sup>	Actions needed to close recommendation	Implementation date <sup>8</sup>
	Section that incorporates building confidence among staff members in the system of addressing misconduct.				
6	UNIFIL should assess the impact of its public awareness campaigns to prevent sexual exploitation and abuse and other forms of misconduct and revise the related public information strategy as necessary.	Important	O	Receipt of the results of UNIFIL's assessment of its public awareness campaign on SEA and other forms of misconduct and a revised public information strategy, if needed.	30 November 2022

# **APPENDIX I**

## **Management Response**

## Management Response

### Audit of conduct and discipline function in the United Nations Interim Force in Lebanon and related regional entities

Rec. no.	Recommendation	Critical <sup>9</sup> / Important <sup>10</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	UNIFIL should strengthen awareness training conducted by the Regional Conduct and Discipline Section by ensuring that they: (a) expand guidance on local customs and practices included in the mandatory induction course for staff to cover risks related domestic workers; and (b) verify that all newly recruited staff attend the training.	Important	Yes	IMTC/RCDS staff with support from leadership /Focal Points of regional entities	30 November 2022	Induction briefing and other related training materials will be revised to reflect risk related to domestic workers under the local customs and practices that may have implications in upholding UN standards of conduct, i.e., the “Kafala” with its possible risks associated with sexual exploitation and abuse and failing to honor private legal obligations. The RCDS will collaborate with Human Resources and IMTC to ensure that all newly recruited staff attend induction.
2	UNIFIL should ensure the Regional Conduct and Discipline Section improves its risk management by: (a) developing and implementing alternative methods to assess risks of client missions when field visits cannot be conducted; and (b) assessing and categorizing risks specific to each mission to enable appropriate mitigating responses.	Important	Yes	Chief RCDS	31 December 2022	The RCDS will develop a plan for oversight field visits to ensure all regional footprints are covered and also explore creative ways to undertake misconduct risk assessments/management remotely to cater for unforeseen situations that create impediments to travelling. Additionally, UNIFIL will develop misconduct risk action plans reflecting the realities and specific needs of each mission plus a regional misconduct risk register.
3	UNIFIL should strengthen the confidential reporting mechanism for the Regional Conduct and Discipline Section to ensure that all allegations of	Important	Yes, but see comments	Conduct and Discipline Officers and RCDS Focal	30 April 2022	The RCDS will engage the other regional missions to ensure that (a) private/confidential space is available to receive complaints and (b) to create

<sup>9</sup> Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

<sup>10</sup> Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

Rec. no.	Recommendation	Critical <sup>9</sup> / Important <sup>10</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	misconduct from the nine regional entities are centrally recorded so that they can be addressed consistently.			Points in Regional entities		localized shadow databases for entry of short summaries of allegations of misconduct to ensure that institutional memory is retained and to facilitate handing over from out-going to incoming conduct and discipline Focal Points.
4	UNIFIL should review the allocation of responsibilities in the Regional Conduct and Discipline Section to ensure that staff are deployed across conduct and discipline functions so that the Section is able to assess allegations of misconduct in a timelier manner.	Important	Yes, but see comments	Chief, RCDS	31 March 2023	The RCDS is currently reviewing the functions and capacities of Conduct & Discipline Officers and has started in-house capacity building sessions to enhance cross-cutting capacities for efficient handling and management of allegations/cases of misconduct. <i>This process has already been initiated and will be on-going and OIOS should clarify what evidence will be considered sufficient to consider the recommendation fully implemented. It is suggested that progress in this regard can be evaluated as part of the e-Performance ending 31 March 2023.</i>
5	UNIFIL should implement a revised communication strategy for the Regional Conduct and Discipline Section that incorporates building confidence among staff members in the system of addressing misconduct.	Important	Yes, but see comments	Chief RCDS with support/approval from leadership of regional entities	31 October 2022	The RCDS will engage the HOM/FC Missions to enhance the awareness of UNFIL personnel on: (a) the UN Whistle blower policy, (b) the issues of confidentiality involved in handling allegations of misconduct as well as the extent to which information may be shared given with staff members about an investigation or action taken as permissible pursuant to ST/AI/2017/1 and (c) to enhance confidence in the system of administration of justice and change perception regarding lack of

Rec. no.	Recommendation	Critical <sup>9</sup> / Important <sup>10</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						confidence in the system of addressing misconduct through periodic broadcast of the report of the Secretary-General on his practice in disciplinary matters and cases of possible criminal behavior as well as a one pager summary on the disciplinary process and steps that follow upon receipt of a complaint.
6	UNIFIL should assess the impact of its public awareness campaigns to prevent sexual exploitation and abuse and other forms of misconduct and revise the related public information strategy as necessary.	Important	Yes, but see comments	Chief RCDS with support/approval from leadership of regional entities	30 November 2022	The RCDS will collaborate with Division of Political and Civil Affairs, Gender Affairs and any other relevant Section/Unit with footprints in the community to conduct its outreach on the UN Zero tolerance policy on SEA, taking into context both the cultural and political sensitivities.