



## INTERNAL AUDIT DIVISION

### REPORT 2014/027

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#### Audit of movement control operations in the United Nations Mission in Liberia

Overall results relating to the effective management of movement control operations in the United Nations Mission in Liberia were initially assessed as partially satisfactory. Implementation of five important recommendations remains in progress

FINAL OVERALL RATING: PARTIALLY  
SATISFACTORY

28 April 2014  
Assignment No. AP2013/626/08

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# AUDIT REPORT

## Audit of movement control operations in the United Nations Mission in Liberia

### I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted an audit of movement control operations in the United Nations Mission in Liberia (UNMIL).
2. In accordance with its mandate, OIOS provides assurance and advice on the adequacy and effectiveness of the United Nations internal control system, the primary objectives of which are to ensure (a) efficient and effective operations; (b) accurate financial and operational reporting; (c) safeguarding of assets; and (d) compliance with mandates, regulations and rules.
3. The Movement Control (MovCon) Section in UNMIL was responsible for the movement of passengers and cargo in support of the Mission's mandate. Its operations were governed by the Department of Peacekeeping Operations (DPKO)/Department of Field Support (DFS) Movement Control Manual. The MovCon Section was headed by a Chief at the P-4 level who was supported by 15 international staff, 5 United Nations volunteers, 20 national staff and 4 military staff officers. Its budget was \$6 million for each of the fiscal years 2012/13 and 2013/14. During the period from 1 July 2012 to 31 October 2013, UNMIL transported 49,940 passengers, 2,392 metric tons of cargo by air and 18,674 metric tons of cargo by sea.
4. Comments provided by UNMIL are incorporated in italics.

### II. OBJECTIVE AND SCOPE

5. The audit was conducted to assess the adequacy and effectiveness of UNMIL governance, risk management and control processes in providing reasonable assurance regarding the **effective management of movement control operations in UNMIL**.
6. The audit was included in the OIOS 2013 risk-based work plan because of the operational and financial risks relating to movement control operations.
7. The key controls tested for the audit were: (a) regulatory framework; and (b) coordinated management. For the purpose of this audit, OIOS defined these key controls as follows:
  - (a) **Regulatory framework** - controls that provide reasonable assurance that policies and procedures: (i) exist to guide movement control operations; (ii) are consistently implemented; and (iii) ensure the reliability and integrity of financial and operational information.
  - (b) **Coordinated management** - controls that provide reasonable assurance that effective coordination is in place with all sections and components of UNMIL to avoid potential overlaps in movement control operations.
8. The key controls were assessed for the control objectives shown in Table 1.

9. OIOS conducted this audit from September to November 2013. The audit covered the period from 1 July 2012 to 31 October 2013.

10. OIOS conducted an activity-level risk assessment to identify and assess specific risk exposures, and to confirm the relevance of the selected key controls in mitigating associated risks. Through interviews, analytical reviews and tests of controls, OIOS assessed the existence and adequacy of internal controls and conducted necessary tests to determine their effectiveness.

### III. AUDIT RESULTS

11. The UNMIL governance, risk management and control processes examined were assessed as **partially satisfactory** in providing reasonable assurance regarding the **effective management of movement control operations in UNMIL**. OIOS made seven recommendations in the report to address the issues identified. UNMIL established adequate procedures to guide staff in performing movement control functions, and controls over passenger bookings were working effectively. The MovCon Section in conjunction with DFS successfully coordinated with troop-/police-contributing countries the planning and execution of deployment, rotation and repatriation flights. However, UNMIL needed to ensure that: (a) non-UNMIL passengers signed the general release from liability form prior to boarding flights; (b) cargo was systematically screened by trained staff; (c) customs clearance of incoming shipments was completed in a timely manner; and (d) there were periodic inspections of cargo loaded onto and offloaded from the leased vessel.

12. The initial overall rating was based on the assessment of key controls presented in Table 1 below. The final overall rating is **partially satisfactory** as implementation of five important recommendations remains in progress.

**Table 1: Assessment of key controls**

Business objective	Key controls	Control objectives			
		Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules
Effective management of movement control operations in UNMIL	(a) Regulatory framework	Partially satisfactory	Partially satisfactory	Partially satisfactory	Partially satisfactory
	(b) Coordinated management	Partially satisfactory	Partially satisfactory	Partially satisfactory	Partially satisfactory
<b>FINAL OVERALL RATING: PARTIALLY SATISFACTORY</b>					

#### A. Regulatory framework

##### Controls over passenger bookings were adequate

13. The DPKO/DFS Movement Control Manual required all passengers travelling on United Nations air assets to have an approved movement of personnel form. Procedures required the form to be submitted to the MovCon Section at least 48 hours prior to the date of travel to allow for planning and efficient allocation of assets.

14. A review of passenger manifests and 1,139 out of 49,940 movement of personnel forms processed during the audit period indicated that the forms were properly completed, processed and approved. Passenger manifests were published in the UNMIL intranet the evening prior to the date of travel to enable passengers to confirm flights. To improve the process, in May 2013, UNMIL was implementing an electronic movement of personnel system and planned to introduce an electronic passenger manifest in due course. OIOS concluded that adequate controls over passenger bookings were in place and working as intended.

Non-United Nations passengers did not sign the general release from liability form

15. The MovCon Section was responsible for ensuring that each non-United Nations passenger, prior to boarding a United Nations aircraft, signed the general release from liability form (waiver) that was witnessed by a United Nations international staff member.

16. A review of travels made by 183 out of the 7,108 non-United Nations passengers during the audit period indicated that: 85 passengers did not sign the waiver; and of the 98 that signed waivers, 7 waivers were not witnessed by a United Nations international staff member. Moreover, a review subsequently conducted by the MovCon Section indicated that of the 7,108 non-United Nations passengers, only 385 signed waivers. This lapse resulted from a lack of procedures for checking, prior to travel, that each non-United Nations personnel had signed a waiver. The lack of waivers exposed the United Nations to risks of financial liability in the event of any injury or death occurring during flights.

**(1) UNMIL should implement procedures to ensure that all non-United Nations passengers, prior to travelling on any United Nations aircraft, sign the general release from liability form.**

*UNMIL accepted recommendation 1 and stated that administrative instructions supplemented by movement control instructions had been issued requiring a waiver to be signed by each non-United Nations passenger prior to the flight. Based on the action taken by UNMIL, recommendation 1 has been closed.*

Cargo movement processing and screening needed improvement

17. To initiate the movement of cargo, the DPKO/DFS Movement Control Manual required: (a) the requestor to submit an authorized cargo movement request form (CMR) to the MovCon Cargo Management Unit; and (b) all baggage to be screened by security personnel. To allow the request to be processed and prioritized, UNMIL required that: (a) CMRs be submitted to the MovCon Section two working days prior to the planned movement; and (b) unaccompanied cargo be delivered to the relevant airfield/airport by 4 p.m. on the last working day prior to the flight.

18. A review of cargo movement operations and 663 out of 9,446 CMRs submitted during the audit period indicated that signatures of relevant UNMIL authorizing officials and designated officials from non-UNMIL entities (United Nations funds and programmes, non-governmental organizations, etc.) were verified and authenticated against the specimen signatures on file. As UNMIL was of the view that this process was cumbersome, it was in the process of implementing an electronic signature system.

19. UNMIL had 15 movement control operational locations at 7 airports/airfields, 7 heliports in Liberia, and 1 airport in Accra, Ghana. A review of these locations indicated that due to resource constraints, UNMIL did not have adequate security measures and facilities at all locations for cargo screening:

- Movement control staff were deployed in six locations and contingent military air liaison officers in the remaining nine locations. These military officers had not been trained on movement control functions, including cargo screening, and these functions were not part of their normal responsibilities;
- UNMIL Integrated Security Section personnel were deployed in four locations only. Therefore, in other locations, security personnel were not screening cargo; and
- Only 3 of the 15 locations had warehouse space to receive unaccompanied cargo the day prior to the flight. In all other locations, cargo items were delivered on the day of flight up to 30 minutes before departure. Because of such a short window of time, the MovCon Section was unable to conduct adequate screening to ensure cargo items matched CMR descriptions.

20. As a result of the above conditions, there was a risk of not detecting unauthorized and dangerous goods even though OIOS did not identify any such case during the audit.

**(2) UNMIL should improve procedures for screening cargo at all movement control locations that process cargo by deploying appropriate levels of movement control and security staff, adequately training military officers assigned movement control and security functions, and ensuring that there is adequate time to check unaccompanied cargo against cargo movement requests.**

*UNMIL accepted recommendation 2 and issued administrative instructions on cargo movements, established a cargo operations cell, and stated that it planned to deploy additional personnel to sectors to ensure effective control and screening. Recommendation 2 remains open pending receipt of evidence that procedures have been implemented to ensure that adequate screening of cargo is done at all locations, including unaccompanied cargo against CMRs prior to loading.*

Delivery of cargo was not effectively monitored

21. The DPKO/DFS Movement Control Manual required space on mission transport assets to be allocated on priority basis and cargo delivery time to be based on established priorities. The Manual provided that indicative priorities should be used, such as: (a) priority 1 - mission essential items within 48 hours; (b) priority 2 - resupply within 7 days; (c) priority 3 - medium priority items within 14 days; (d) priority 4 - low priority items within 28 days; and (e) priority 5 - United Nations agencies/non-governmental organizations on space-available basis.

22. UNMIL established priority categories, including: (a) priority; (b) space available; and (c) others. However, UNMIL did not establish expected delivery times of cargo to be transported under these priority categories. A review of a sample of 663 CMRs indicated that 129 CMRs were ranked as priority, 484 were classified as space available and 50 were grouped as special, which referred to cargo on special reimbursable flights. However, due to staffing constraints, UNMIL had not established expected timelines for delivery per priority category and did not document on the CMR the time taken to transport cargo. UNMIL also did not have a system to monitor the effectiveness of movement of cargo, and whether it was delivered within reasonable timelines, as required by the DPKO/DFS Movement Control Manual.

**(3) UNMIL should establish expected delivery dates for cargo priority categories and implement a system to ensure cargo movements from loading point to final destination are recorded and systematically monitored.**

*UNMIL accepted recommendation 3 and stated that formal reporting systems had been developed and disseminated to sectors to ensure full follow-up of deliveries. Recommendation 3 remains open pending receipt of a copy of the expected delivery times of cargo per priority category and evidence of follow-up of deliveries/monitoring of the movement of cargo.*

Not all the required movement control reports were prepared

23. To monitor and report movement operations, the DPKO/DFS Movement Control Manual required the timely preparation of: (a) movement discrepancy reports; (b) lost/found baggage reports; (c) movement incident reports; and (d) movement completion reports.

24. A review of 38 out of the 127 deployment, rotation and repatriation flights during the audit period indicated that the MovCon Section had compiled and forwarded to DFS in a timely manner the movement completion reports for use in monitoring services provided by contractors and troop-/police-contributing countries. However, as UNMIL had not provided adequate guidance to staff, the MovCon Section did not prepare movement discrepancy reports, lost/found baggage reports and movement incident reports. These reports contained important information to track whether movement of passengers and cargo were transported as planned and any lost/found baggage was followed up to ensure appropriate action was taken.

**(4) UNMIL should provide concerned staff with adequate guidance on the preparation of required movement control reports such as movement discrepancy reports, lost/found baggage reports and movement incident reports to ensure that they are prepared in a timely manner to improve management oversight of movement control activities.**

*UNMIL accepted recommendation 4 and issued instructions for the completion of the requisite reports for effective monitoring and reporting of movement operations. Recommendation 4 remains open pending receipt of evidence of implementation of procedures to ensure movement discrepancy reports, lost/found baggage report and movement incident reports are prepared for movement operations.*

Customs clearance of incoming shipments needed to be improved

25. The Status of Forces Agreement signed on 4 December 2003 with the Government of Liberia allowed UNMIL to import items duty free for its exclusive and official use. The MovCon Section was responsible for obtaining and retaining tax exemptions, customs clearance documentations, and clearing of shipments from the ports of entry. The MovCon Section's key performance indicators for the custom clearance process was set at 15 days, including 7 days for transfer of incoming cargo from port of entry to UNMIL-designated locations and 8 days to finalize custom clearance and deliver the cargo to the Receiving and Inspection Unit.

26. A review of 61 of the 654 incoming shipments over the audit period indicated that performance timelines were not always met and important customs clearance documents were not maintained. For example:

- The average timeline for transferring incoming cargo from port of entry to UNMIL-designated movement control locations was 31 days instead of the expected 7 days and the delivery from the MovCon Section yard to the Receiving and Inspection Unit after the custom clearance process took an average of 46 days instead of the expected 8 days. These delays were mainly due to lack of oversight and inadequate follow-up with vendors by UNMIL to ensure that

shipping documents were received in a timely manner. Consequently, storage fees of \$16,037 were incurred; of which \$9,525 was paid by the vendor or the clearing agent and \$6,512 by UNMIL; and

- Certain shipping and customs documents pertaining to 55 of 61 duty free shipments were not available. UNMIL had also not implemented adequate procedures to monitor and ensure that clearing agents provided all original signed custom clearance documents. As a result, UNMIL was unable to track the status of its total duty free privileges in the period. Without the customs clearance documentation, UNMIL could also face challenges and questions from the Government resulting in delays or non-authorization to either export or dispose of the affected items.

**(5) UNMIL should strengthen the monitoring and follow-up of imported shipments to ensure that vendors provide all shipping documents in a timely manner to expedite the custom clearance process and clearing agents provide all signed original customs documents.**

*UNMIL accepted recommendation 5 and stated that close follow-up measures had been initiated and in coordination with the Procurement Section the process was being monitored. Based on the action taken by UNMIL, recommendation 5 has been closed.*

There was no documentation of risk assessment conducted pertaining to movement control operations

27. The work plan of the MovCon Section for fiscal years 2012/13 and 2013/14 required risk assessments of the Section's operations to be conducted every four months and for actions to be taken to mitigate any risks identified.

28. While the MovCon Section advised that the required risk assessments were conducted, the results and details of related mitigation actions were not documented for the period from November 2012 to October 2013. The MovCon Section also confirmed that no risk assessments of airport facilities had been done since October 2011. Without a formal risk management process, UNMIL was not able to identify and systematically address risks, as well as opportunities for improving movement control procedures and services provided.

**(6) UNMIL should document the results of the Movement Control Section risk assessments and subsequently monitor implementation of proposed mitigating actions to ensure identified risks are mitigated in a timely manner.**

*UNMIL accepted recommendation 6 and stated that the scope and definition of its risk assessments would be reviewed. Recommendation 6 remains open pending receipt of a copy of the results of risk assessments conducted and proposed mitigating actions.*

[REDACTED]

[REDACTED]

[REDACTED]



[Redacted]

[Redacted]

## **B. Coordinated management**

The Movement Control Section adequately coordinated its activities with other Mission components

31. The DPKO/DFS Movement Control Manual required the establishment of a Joint Movement Coordination Centre within the MovCon Section to be responsible for the overall planning and coordination of movements including deployments, rotations and repatriations of contingents, cargo and passengers.

32. During the audit period, the UNMIL Joint Movement Coordination Centre established adequate and effective coordination with United Nations headquarters and relevant UNMIL components for 3 troop deployments, 117 rotations and 7 repatriations. The Centre worked effectively to coordinate with: (a) the Transport and Movements Services of DFS to finalize rotation schedules; and (b) the UNMIL Joint Logistics Operations Centre to issue tasking orders for arranging transportation to move cargo and baggage from contingent locations to the airport. UNMIL military, police, Transport and Aviation Sections coordinated adequately their activities for the check-in of troops and their baggage, transport service to and from the airport and the arrangement of departure flights. OIOS concluded that adequate controls were in place and working as intended.

## **IV. ACKNOWLEDGEMENT**

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

*(Signed)* David Kanja  
Assistant Secretary-General for Internal Oversight Services

## STATUS OF AUDIT RECOMMENDATIONS

## Audit of movement control operations in the United Nations Mission in Liberia

Recom. no.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	C/ O <sup>3</sup>	Actions needed to close recommendation	Implementation date <sup>4</sup>
1	UNMIL should implement procedures to ensure that all non-United Nations passengers, prior to travelling on any United Nations aircraft, sign the general release from liability form.	Important	C	Action taken	Implemented
2	UNMIL should improve procedures for screening of cargo at all movement control locations that process cargo by deploying appropriate levels of movement control and security staff, adequately training military officers assigned movement control and security functions, and ensuring that there is adequate time to check unaccompanied cargo against cargo movement requests.	Important	O	Receipt of evidence that procedures have been implemented to ensure that adequate screening of cargo is done at all locations, including unaccompanied cargo against CMRs prior to loading	June 2014
3	UNMIL should establish expected delivery dates for cargo priority categories and implement a system to ensure cargo movements from loading point to final destination are recorded and systematically monitored.	Important	O	Receipt of a copy of the expected delivery times of cargo per priority category and evidence of follow-up of deliveries/monitoring of the movement of cargo	March 2014
4	UNMIL should provide concerned staff with adequate guidance on the preparation of required movement control reports such as movement discrepancy reports, lost/found baggage reports and movement incident reports to ensure that they are prepared in a timely manner to improve management oversight of movement control	Important	O	Receipt of evidence of implementation of procedures to ensure movement discrepancy reports, lost/found baggage report and movement incident reports are prepared for all movement operations	September 2013

<sup>1</sup> Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

<sup>2</sup> Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

<sup>3</sup> C = closed, O = open

<sup>4</sup> Date provided by UNMIL in response to recommendations

## STATUS OF AUDIT RECOMMENDATIONS

## Audit of movement control operations in the United Nations Mission in Liberia

Recom. no.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	C/ O <sup>3</sup>	Actions needed to close recommendation	Implementation date <sup>4</sup>
	activities.				
5	UNMIL should strengthen the monitoring and follow-up of imported shipments to ensure that vendors provide all shipping documents in a timely manner to expedite the custom clearance process and clearing agents provide all signed original customs documents.	Important	C	Action taken	Implemented
6	UNMIL should document the results of the Movement Control Section risk assessments and subsequently monitor implementation of proposed mitigating actions to ensure identified risks are mitigated in a timely manner.	Important	O	Receipt of a copy of the results of the risk assessments conducted and proposed mitigated actions	September 2014

# **APPENDIX I**

## **Management Response**



*Office of Special Representative of the Secretary General*

**Date:** 10 April 2014

**To:** Ms. Eleanor T. Burns  
Chief, Peacekeeping Audit Services  
Internal Audit Division, OIOS

**From:** Karin Landgren  
Special Representative of the Secretary-General  
UNMIL

A handwritten signature in blue ink, appearing to read 'Karin Landgren', positioned to the right of the 'From:' field.

**Subject:** Assignment no. AP2013/626/08 – UNMIL’s response to the draft report on audit of movement control operations in UNMIL

Thank you for providing us with the opportunity to comment on the above referenced audit.

Please see the comments of the mission to the audit in the attached matrix, as requested in your memorandum dated 27 March 2014 (attached). A Word version of the matrix is immediately provided to you via e-mail, while a hardcopy of the matrix and this signed memorandum will be delivered by Mail & Pouch.

Regards

cc:

Mr. Hubert Price, Director Mission Support, UNMIL  
Ms. Denise Wilman, Chief of Staff, UNMIL  
Mr. Francisco Rouillon, Chief Integrated Support Services, UNMIL  
Mr. Jacques Heynen, Chief Movement Control Section, UNMIL  
Mr. Bernard Philips, OIC Audit Focal Point, UNMIL  
Ms. Anna Halasan, Professional Practices Section, Internal Audit Division, OIOS

## Management Response

## Audit of movement control operations in the United Nations Mission in Liberia

Rec. no.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	UNMIL should implement procedures to ensure that all non-United Nations passengers, prior to travelling on any United Nations aircraft, sign the general release from liability form.	Important	Yes	Chief Movement Control Section	Implemented since September 2013	UNMIL developed an Administrative Instruction, dated 5 September 2013 (revised on 21 November 2013), supplemented by Movement Control Instructions, issued on 18 September 2013, requiring a waiver to be signed by each non-UN passenger prior to the flight. Movement Control Units are also required to submit daily all documents to the Passenger Booking Unit. Additionally, Military Air Liaison Officers deployed in the Area Of Responsibility as Movement Control staff have also been provided with appropriate training - organized by the Joint Movement Coordination Center - on the subject matter (Portfolio of evidence

<sup>1</sup> Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

<sup>2</sup> Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

## Management Response

## Audit of movement control operations in the United Nations Mission in Liberia

Rec. no.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						has been submitted to the OIOS resident auditors).
2	UNMIL should improve procedures for screening of cargo at all movement control locations that process cargo by deploying appropriate levels of movement control and security staff, adequately training military officers assigned movement control and security functions, and ensuring that there is adequate time to check unaccompanied cargo against cargo movement requests.	Important	Yes	Chief Movement Control Section	June 2014	UNMIL issued Administrative Instructions on Cargo Movements on 13 December 2013 (revised on 13 January 2014). In order to ensure the effective implementation of the Administrative Instructions, Movement Control Instructions were issued on 22 October 2013. Additionally, the Movement Control Joint Mission Coordination Center was reorganized, including the establishment of an Operations Cell in charge of Cargo operations in February 2014. Desk Officers at the Joint Mission Coordination Center and Movement Control Units in the field are actively coordinating and controlling the movement of assets. While UNMIL is finalizing the implementation of a centralized warehouse, Movement Control has put in place strict control

## Management Response

## Audit of movement control operations in the United Nations Mission in Liberia

Rec. no.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						measures at the various points of departure to monitor whatever is moved in the mission area. On the training of Military personnel (Air Liaison Officers), the current Training Package (2011 edition) covers this aspect of operations. Movement Control has requested - and the mission management has agreed to - the deployment of additional Movement Control personnel to key sectors (Zwedru, Harper, Gbargna & Greenville), which will be effective by June 2014. Reporting and cargo submission times were published to ensure the effective control and screening of cargo at all Movement Control Units (Portfolio of evidence has been submitted to the OIOS resident auditors).
3	UNMIL should establish expected delivery dates for cargo priority categories and implement a system to ensure cargo movements from loading point to final destination are recorded and systematically monitored.	Important	Yes	Chief Movement Control Section	Implemented since March 2014	UNMIL has developed a formal reporting system, which has been disseminated to the sectors



## Management Response

## Audit of movement control operations in the United Nations Mission in Liberia

Rec. no.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						to ensure a full follow-up of deliveries. Movement Control Units are required to complete, on daily basis, documents available on the Unit Share Drive and to submit those reports/documents, on monthly basis, to the Movement Control Management (Office of Movement Control). The processes and instructions were given at the Movement Control Quarterly meeting in March 2014 (Portfolio of evidence has been submitted to the OIOS resident auditors).
4	UNMIL should provide concerned staff with adequate guidance on the preparation of required movement control reports such as the movement discrepancy reports, lost/found baggage reports and movement incident reports to ensure that they are prepared in a timely manner to improve management oversight of movement control activities.	Important	Yes	Chief Movement Control Section	Implemented since September 2013	Movement Control Instructions were issued in September 2013 and revised in February 2014 to ensure the implementation of this recommendation. All these aspects are covered by the UNMIL Movement Control Standard Operating Procedure (Portfolio of evidence has been submitted



