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Programme questions: evaluation

Evaluation of the Office of Human Resources Management

Report of the Office of Internal Oversight Services

Summary

The Office of Internal Oversight Services (OIOS) assessed the relevance, efficiency and effectiveness of human resources management as supported by the Department of Management prior to the restructuring implemented on 1 January 2019. While the primary focus of the evaluation was on the Office of Human Resources Management, other parts of the Department engaged in human resources management activities were also included in the scope of the assessment. The evaluation was conducted using surveys, interviews, document and policy reviews, direct observation, secondary data analyses and a benchmarking review.

The Department of Management, primarily through the Office of Human Resources Management, has provided critical support to the Organization in human resources management in a complex, fluid and highly regulated environment characterized by continuous organizational reforms, shifting and competing priorities and resource constraints. This has stretched its capacity to provide strategic leadership and a client orientation in the human resources area. To be fully effective, human resources management requires a successful partnership between the Department of Management-Office of Human Resources Management and the programme managers directly responsible for administering human resources activities.

Within this complex environment, the Office has had the challenging task of formulating human resources policies for an increasing number of broadly defined goals and requirements. The current policy framework does not facilitate the achievement of the Organization's goals, primarily because the framework is voluminous, fragmented, outdated and, at times, contradictory. New policy issuances were often not communicated in a timely manner and there was no mechanism for

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** E/AC.51/2019/1.



ensuring policy changes were responsive and coherent. Both clients and staff perceived the framework and its implementation as focusing more on compliance than on results.

Primarily because of an outdated delegation of authority framework, lack of a central repository and over-reliance on institutional memory, clients were unclear about the human resources authorities delegated to them. This contributed to a lack of clarity and inconsistency in the interpretation of delegation of authority across departments and offices of the Secretariat, which in turn contributed to inefficiencies. Furthermore, the Office of Human Resources Management has not systematically monitored the use of the authorities that have been delegated.

The Secretariat talent management framework, comprising four components – workforce planning, selection and recruitment, performance management, and learning and career development – has seen some progress in its implementation. This has included, for example, developing tools and guides for workforce planning; piloting testing modalities for candidate filtering; closing knowledge gaps on performance management; and offering opportunities for online learning. However, shortcomings remained in each of the four components, and integration between them was lacking.

OIOS makes seven important recommendations to the Department of Management-Office of Human Resources Management:

- Support the ongoing simplification and streamlining of policies project
- Strengthen the procedure for promulgating new or revised administrative issuances
- Establish a clear delegation of authority through a new framework
- Further strengthen workforce planning
- Strengthen the components/requirements within the selection and recruitment policy
- Recognize and enhance the Secretariat human resources community by establishing a certified training programme
- Introduce specific measures to enhance its overall client orientation

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I. Introduction and objective

1. The Inspection and Evaluation Division of the Office of Internal Oversight Services (OIOS) identified the Department of Management for evaluation on the basis of a risk assessment designed to identify Secretariat programme evaluation priorities. The Committee for Programme and Coordination selected the programme evaluation of the Department of Management for consideration at its fifty-ninth session, to be held in June 2019 (see [A/72/16](#)). The General Assembly endorsed the selection in its resolution [72/9](#).

2. The general frame of reference for OIOS is set out in General Assembly resolutions [48/218 B](#), [54/244](#) and [59/272](#), and in Secretary-General's bulletin [ST/SGB/273](#), which authorizes OIOS to initiate, carry out and report on any action that it considers necessary to fulfil its responsibilities. Evaluation by OIOS is provided for in the Regulations and Rules Governing Programme Planning, the Programme Aspects of the Budget, the Monitoring of Implementation and the Methods of Evaluation.¹

3. The overall evaluation objective was to assess the relevance, efficiency and effectiveness of human resources management as supported by the Department of Management. While the primary focus of the evaluation was on the Office of Human Resources Management, other parts of the Department engaged in human resources management activities were also included in the scope. The evaluation topic emerged from a programme-level risk assessment described in the evaluation inception paper.² The evaluation was conducted in conformity with the norms and standards for evaluation in the United Nations system.³

4. The comments of the Department of Management were sought on the draft report and taken into account. The formal response of the Department is included in the annex to the present report.

II. Background

A. Mandate and roles

5. The mandates of the Department of Management derive from the Charter of the United Nations,⁴ General Assembly resolutions,⁵ the Financial and Staff Regulations and the Regulations and Rules Governing Programme Planning, the Programme Aspects of the Budget, the Monitoring of Implementation and the Methods of Evaluation. The overall objective of the Department is to ensure the full implementation of legislative mandates and compliance with United Nations policies and procedures in order to provide an effective management culture throughout the Organization.⁶

¹ [ST/SGB/2016/6](#), regulation 7.1: (a) To determine as systematically and objectively as possible the relevance, efficiency, effectiveness and impact of the Organization's activities in relation to their objectives; and (b) to enable the Secretariat and Member States to engage in systematic reflection, with a view to increasing the effectiveness of the main programmes of the Organization by altering their content and, if necessary, reviewing their objectives.

² See IED-17-006, IED-OIOS inception paper, "Programme evaluation of the Department of Management", 5 June 2017.

³ Reissued by the United Nations Evaluation Group in 2016.

⁴ Specifically, Articles 8, 17, 97, 100 and 101.

⁵ The two most recent General Assembly resolutions on human resources management were resolutions [71/263](#) and [72/254](#).

⁶ Section 29 of the proposed programme budget for the biennium 2016–2017 ([A/70/6 \(Sect. 29\)](#)).

6. The Department of Management plays three key roles:

(a) **Policy and procedural formulation and enforcement**, assisting the Secretary-General in formulating and ensuring compliance with policies, rules and regulations emanating from the General Assembly;

(b) **Administrative support services**, providing administrative support services to departments across the areas of finance, programme planning, budgeting, monitoring and reporting, information technology, human resources and central support;⁷

(c) **Strategic guidance and direction**, leading Secretariat reform initiatives.

B. Leadership and structure

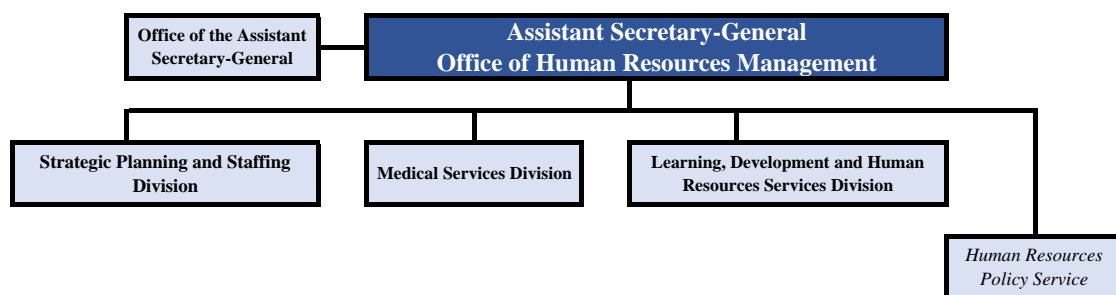
7. The Department of Management is led by an Under-Secretary-General who is supported by four Assistant Secretary-Generals responsible for central support services; human resources management; programme planning, budget and accounts; and information and communications technology.

C. Human resources management

8. The Office of Human Resources Management is the central authority for human resources management. The Office is responsible for developing and implementing policies, programme procedures and supporting systems on staff selection, career development, conditions of service, performance management and staff health. Figure I shows the structure of the Office.

Figure I

Organization chart of the Office of Human Resources Management⁸



Resources

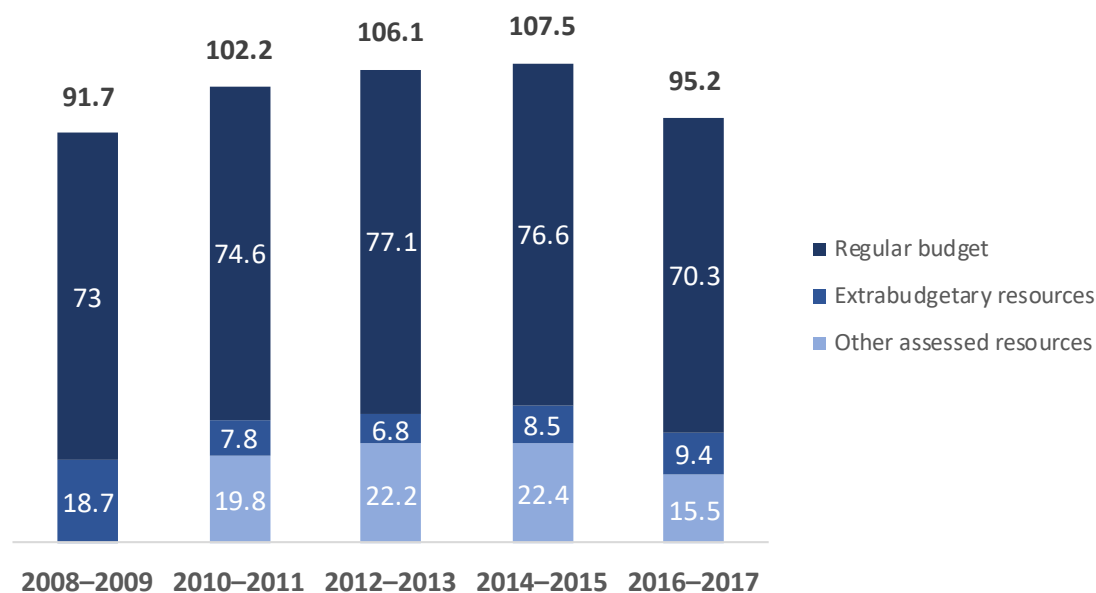
9. The financial and post resources of the Office of Human Resources Management remained stable in the bienniums 2010–2011 to 2016–2017, as shown in figures II and III. Changes from 2012–2013 to 2016–2017 concerned resources allocated to the human resources information systems component created in 2010–2011; this moved to the Office of Information and Communications Technology in the biennium 2016–2017.

⁷ Peacekeeping and special political missions are primarily supported by the Department of Field Support (ST/SGB/2010/2).

⁸ The organization chart shows the divisions and the Human Resources Policy Service.

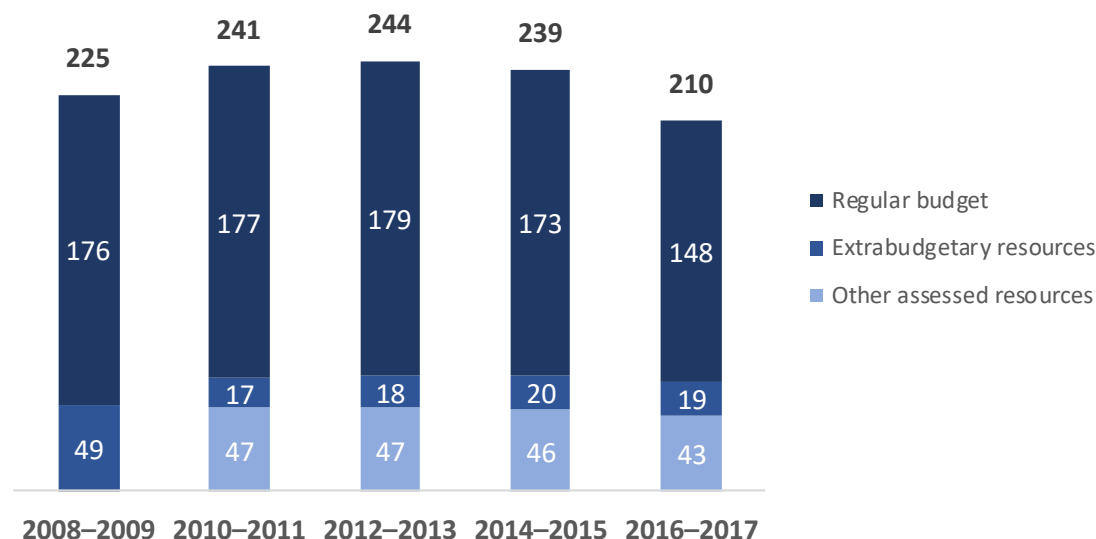
Figure II
Financial resources of the Office of Human Resources Management, 2008–2017

(Millions of United States dollars)



Source: Proposed programme budget of the Office of Human Resources Management (A/64/6 (Sect. 28C), A/66/6 (Sect. 29C), A/68/6 (Sect. 29C), A/70/6 (Sect. 29C) and A/72/6 (Sect. 29C)).

Figure III
Post resources of the Office of Human Resources Management, 2008–2017



Source: Proposed programme budget of the Office of Human Resources Management (A/64/6 (Sect. 28C), A/66/6 (Sect. 29C), A/68/6 (Sect. 29C), A/70/6 (Sect. 29C) and A/72/6 (Sect. 29C)).

10. In 2016 the Secretary-General introduced an updated human resources management framework (A/71/323).

11. In managing talent, the framework was aimed at integrating four elements of human resources: workforce planning; selection and recruitment; performance management; and learning and career development (ibid.).

III. Methodology

12. The evaluation focused on the following four questions:⁹

(a) To what extent are the activities undertaken by the Department of Management in human resources aligned with its overall mandate?

(b) To what extent are current structural arrangements, with regard to playing both a policy and service provider role in the human resources area, efficient?

(c) How efficient has the Department been in providing policies and services, particularly in the human resources area?

(d) How effective has the Department been in ensuring the Organization has the staff it needs to achieve its goals?

13. The scope of the evaluation excluded peacekeeping and special political missions, as well as the managed mobility system, for which a separate review mandated by the General Assembly in its resolution 68/265 was under way. The evaluation preceded the restructuring of the Department of Management implemented on 1 January 2019.

14. The evaluation employed the following qualitative and quantitative data collection methods. All evaluation results were triangulated with multiple data sources.

(a) **Interviews**, conducted in person or by telephone, with Department of Management staff, clients and other entities, as shown in table 1;

Table 1
Interviews

| <i>Number of interviews</i> | <i>Type of interviewee</i> |
|-----------------------------|---|
| Staff | |
| 39 | Department of Management staff |
| Clients | |
| 14 | Offices away from Headquarters: United Nations Office at Geneva, United Nations Office at Vienna and United Nations Office at Nairobi |
| 12 | Executive offices of Headquarters-based Secretariat entities |
| 8 | Secretariat entities and units outside of Headquarters |
| 5 | Regional commissions |
| Other | |
| 9 | Non-Secretariat entities |
| 5 | Regional groups of the Bureau of the Fifth Committee |

(b) **Web-based surveys** conducted in mid-2017 of:

⁹ Efficiency is defined as the timeliness and cost-effectiveness of human resources activities; and effectiveness is defined as the extent to which objectives have been achieved.

- (i) A non-random sample of Secretariat managers (manager survey);¹⁰
- (ii) All 34 heads of departments/offices;¹¹
- (c) **Mission** to the United Nations Office at Geneva;
- (d) **Document review** of academic journals and prior reports on past United Nations reforms;
- (e) **Analysis** of human resources data from HR Insight, Umoja and other sources provided by the Office of Human Resources Management;
- (f) **Direct observation** of three meetings with the Department of Management and executive offices in New York;
- (g) **Analysis** of data on exceptions and discretionary actions compiled from information provided by executive offices, offices away from Headquarters and regional commissions;
- (h) **Analysis** of Secretary-General's bulletins and administrative instructions related to human resources in force as at 31 December 2017, including an in-depth review of the temporary appointment policy;
- (i) **Secondary data analysis** of past evaluations, audits, budget information and Department of Management programme performance reports;
- (j) **Benchmarking** to compare talent management frameworks in the United Nations Development Programme (UNDP) and the World Bank.¹²

15. For the purpose of this evaluation, interviewed Department of Management-Office of Human Resources Management clients will refer to executive offices, offices away from Headquarters, regional commissions and other Secretariat entities and units. Surveyed clients will refer to heads of departments/offices.

IV. Evaluation results

A. Continuous reforms and shifting priorities have changed the focus of the Department of Management-Office of Human Resources Management and stretched its capacity to provide strategic leadership and support to the Organization in human resources management

Successive organizational reforms and evolving mandates have shifted the focus of the Office of Human Resources Management over different bienniums

16. Since the late 1990s, the Department of Management has been tasked with leading the implementation of continuous organizational reforms and Secretariat-wide initiatives in human resources management. Some recent initiatives included Inspira, contractual arrangements and harmonization of conditions of service, Umoja, the managed mobility system, the new common system compensation package, and the system-wide gender parity strategy. An OIOS evaluation of the Office of Human Resources Management in 2008 found that continuous reform efforts had

¹⁰ The survey was sent to 1,916 staff who had been both a hiring or programme manager in an Inspira-based recruitment process since 2013, and a first reporting officer in the 2016–2017 performance cycle; 834 responded, for a 44 per cent response rate.

¹¹ The survey was sent to 34 heads of departments/offices; 19 responded, for a 56 per cent response rate.

¹² The benchmarking was conducted by human resources expert consultants.

overburdened the Office and diminished its planning and policy development capacity.¹³ Interviews conducted with Department of Management-Office of Human Resources Management clients and Department of Management staff confirmed that, 10 years later, the Office remained overwhelmed with multiple priorities. The Office provided critical human resources support to the Organization in a complex environment that was fluid and highly regulated; it also relied on an effective partnership with programme managers for the delivery of human resources activities.

17. Since the biennium 2004–2005, with the exception of the Medical Services Division, the Office of Human Resources Management underwent restructuring to support the implementation of reform initiatives, repositioning parts of the Office and changing objectives and expected accomplishments. In particular, the policy, strategic planning and staffing components changed significantly from the 2008–2009 biennium to the 2014–2015 biennium. For example, the multipronged objectives were replaced with single ones in 2012–2013. Regarding expected accomplishments, processing of appeals was added in 2010–2011, while facilitating voluntary mobility, and providing data and reports to intergovernmental bodies, were added in 2012–2013. Monitoring of delegated authority in human resources and workforce planning were dropped as expected accomplishments in 2014–2015.¹⁴

Overall resource levels within the Office of Human Resources Management have not increased with the greater workload of leading organizational reforms

18. Some reform initiatives, including the managed mobility system, the common system compensation package and the system-wide gender parity strategy, have been implemented within existing resources. During this time, the overall resource levels of the Office remained mostly constant. Of the 23 OHRM staff interviewed, 15 stressed the challenge of tackling a growing list of priorities without concurrent resource increases.

The Department of Management-Office of Human Resources Management provided insufficient strategic leadership to align its various human resources initiatives

19. While greater workload associated with organizational reform was not accompanied by corresponding resource increase, as noted above the leadership of the Department of Management in these initiatives was not always sufficiently strategic. Only 6 out of 19 heads of departments/offices surveyed rated the Department's overall strategic leadership on human resources management as good, and interviews with representatives of executive offices, offices away from Headquarters and regional commissions confirmed this. The Office experienced a critical internal leadership vacuum when leadership was needed to guide the large-scale initiatives reshaping the human resources management system of the Organization. The unexpected departure of the former Assistant Secretary-General for Human Resources Management in October 2016 created a high-level gap for approximately 10 months; this also overlapped with a transition at the level of the Under-Secretary-General. Out of the 39 Department of Management staff interviewed, 16 stated that the Department conducted its business without an overarching vision to provide coherence to its work.

20. The Department of Management-Office of Human Resources Management has not been perceived as sufficiently client oriented. Only 7 out of 19 heads of departments/offices surveyed reported being satisfied with the overall human resources management support provided by the Department-Office, and

¹³ In-depth evaluation of the Office of Human Resources Management (A/63/221).

¹⁴ OIOS analysis of proposed biennial programme budgets of the Office of Human Resources Management from 2004–2005 to 2016–2017.

representatives of executive offices and regional commissions interviewed did not rate the support provided by the Department-Office on critical human resources functions very highly, as shown in table 2. In addition, 11 of 20 representatives of executive offices, offices away from Headquarters and regional commissions interviewed highlighted a lack of client orientation in some human resources areas, with 4 of them attributing it to heavy workloads related to continuous reform initiatives. Of the 39 Department staff interviewed, 14 also felt that client focus was missing in the work of the Department-Office.

Table 2

Clients did not rate the Department of Management-Office of Human Resources Management support highly

| <i>Human resources function</i> | <i>Rating</i> | | |
|---|---------------|-------------|-------------|
| | <i>Poor</i> | <i>Fair</i> | <i>Good</i> |
| Department-Office support with recruitment | 7 | 3 | 4 |
| Department-Office support with staff performance | 2 | 5 | 8 |
| Department-Office support with staff learning and development | 2 | 6 | 5 |

Source: OIOS interviews with executive offices and regional commissions.

B. The human resources policy framework does not facilitate the achievement of the human resources goals of the Organization

The Office of Human Resources Management has been responsible for formulating human resources policies for a growing number of broadly defined goals and requirements

21. The General Assembly has established a variety of principles, goals and considerations for Secretariat human resources management, reflecting the diverse interests of Member States. These include:

- (a) Equitable geographical distribution;¹⁵
- (b) Equality of the two working languages;¹⁶
- (c) Command of the official language(s) spoken in the country of residence;¹⁷
- (d) Equal treatment of candidates with equivalent educational backgrounds;¹⁸
- (e) Adequate representation of women from developing countries;¹⁹
- (f) Equal treatment of internal and external candidates;²⁰
- (g) Representation of developing countries.²¹

22. In its resolution [68/252](#), the General Assembly reaffirmed the role of the Fifth Committee in carrying out an appropriately thorough analysis of human and financial resources and policies and approving them.²² The Office had the challenging task of

¹⁵ General Assembly resolution [71/263](#), para. 8.

¹⁶ *Ibid.*, para. 10.

¹⁷ General Assembly resolution [71/263](#), para. 11.

¹⁸ General Assembly resolution [71/263](#), para. 7.

¹⁹ General Assembly resolution [71/263](#), para. 20.

²⁰ General Assembly resolution [68/265](#), para. 10.

²¹ General Assembly resolution [67/255](#), para. 47.

²² General Assembly resolution [68/252](#), para. 4.

developing detailed policy proposals for consideration and approval by Member States and, once approved, formulating administrative issuances to interpret and operationalize the principles and goals of the resolutions.

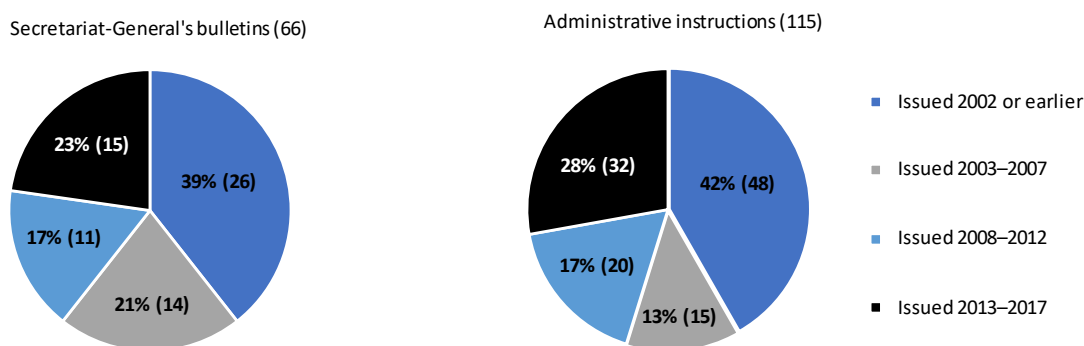
The human resources policy framework was voluminous, fragmented, outdated and contained gaps and contradictions

23. The human resources policy framework was large and fragmented. At the end of 2017 there were 66 Secretary-General's bulletins and 115 administrative instructions related to human resources.²³ The 115 administrative instructions totalled 639 pages, averaging 7 pages each. Some staff rules or topics were covered by a Secretary-General's bulletin and a corresponding administrative instruction, while others were addressed by only one type of issuance. In other instances, multiple Secretary-General's bulletins and/or administrative instructions covered the same topic. In addition, the Under-Secretary-General for Management and the Assistant Secretary-General for Human Resources Management have issued several inter-office memorandums establishing additional guidelines, further compounding the fragmentation of the policy framework.

24. The policy framework was also outdated; 31 per cent of the 66 Secretary-General's bulletins and 41 per cent of the 115 administrative instructions were at least 15 years old, as shown in figure IV. Many contained provisions that were unaligned with or contradicted more recent rules. For example, ST/AI/401 on personnel arrangements for OIOS, issued in 1995 and last amended in 2003, stipulates that the Under-Secretary-General for OIOS has the authority to appoint, promote and terminate contracts of his/her staff. Secretary-General's bulletin ST/SGB/2015/1 on delegation of authority in the administration of the Staff Regulations and Staff Rules, issued in 2015, states, however, that the Secretary-General has this authority for staff at the D-2 level and above. The contradictions often occurred owing to not revising the provisions in existing issuances when a new policy introduced a new or revised rule.

Figure IV

A total of 39 per cent of Secretary-General's bulletins and 42 per cent of administrative instructions on human resources were issued more than 15 years ago



Source: OIOS analysis of human resources-related Secretary-General's bulletins and administrative instructions in force as at 31 December 2017.

²³ These represent Secretary-General's bulletins and administrative instructions that are listed under the category of human resources in the indexes to administrative issuances.

25. Department of Management-Office of Human Resources Management clients also identified gaps in the policy framework. The executive offices, offices away from Headquarters and regional commissions identified 17 areas that were critical to their operations where no administrative instructions or guidelines existed, or where existing administrative instructions were obsolete. These included, among others, retrenchment and downsizing, and temporary assignments, for which the main policy (ST/AI/404 on assignment to and return from mission detail, issued in 1995) was outdated.

The policy framework required significant interpretation and judgment, thus resulting in administrative inefficiency and inconsistent application

26. The policy framework contained two types of irregular actions: discretionary actions and exceptions to staff rules, which only the Assistant Secretary-General for Human Resources Management has the authority to make. Of the original and revised 41 administrative instructions issued from 2003 to 2017, 28 (68 per cent) contained at least one discretionary action. Six staff of the Department of Management volunteered there were too many discretionary actions and exceptions, creating the risk of these irregular actions becoming the norm.

27. Both Department of Management-Office of Human Resources Management clients and Department of Management staff considered human resources policies to be too complicated. Only 7 of 19 heads of departments/offices surveyed thought that the Office of Human Resources Management provided clear organizational policy and guidelines on human resources management, and over half of the representatives of the executive offices, offices away from Headquarters and regional commissions interviewed (11 out of 20) expressed the opinion that human resources rules and policies were complex, confusing and/or difficult to understand. Of the 39 Department of Management staff interviewed, 14 voiced the same opinion, attributing this to several factors, including intergovernmental decisions reflecting diverse Member State interests, the requirement to consult staff representatives, the influence of the administration of justice system, and the Office of Human Resources Management itself putting in place measures to prevent abuse.

28. Understanding and interpreting this complex policy framework was thus a major challenge. Policy interpretation and exercise of discretionary actions largely relied upon the knowledge and individual judgment of human resources practitioners throughout the Organization. Certain cases were referred to multiple authorities, from an executive office or local human resources office to one or more units in an office away from Headquarters and/or the Office of Human Resources Management. Within the Office, policy interpretation responsibilities were diffused. Representatives of 10 executive offices, offices away from Headquarters and regional commissions and 8 Department of Management staff interviewed stated that policy interpretation and review of requests for exceptions required a considerable amount of time and resources. The process was said to slow down operations and affect delivery of programmatic mandates. Six heads of departments/offices surveyed expressed concern about unclear, inconsistent and/or conflicting policy interpretation; representatives of five executive offices, offices away from Headquarters and regional commissions also noted a lack of transparency in the approval processes for discretionary actions and exceptions.

Clients and staff perceived that the framework and its implementation focused disproportionately on compliance rather than results, and did not adequately respond to operational needs

29. Both Department of Management-Office of Human Resources Management clients and Department of Management staff interviewed stated that the human resources policy framework and its implementation were overly focused on compliance. More than half of representatives of the executive offices, offices away from Headquarters and regional commissions (11 out of 20) and 8 of the 39 Department of Management staff indicated that the Office focused excessively on processes and strict compliance with rules to the detriment of actively finding efficient and effective ways of supporting mandate delivery.

30. Clients also described a lack of responsiveness to operational needs. Over half the heads of departments/offices (10 out of 19) surveyed noted human resources policies did not meet their specific operational needs: the policy framework was seen as lacking adequate flexibility to support diverse mandates in very different operational settings. In addition, nearly half of representatives of the executive offices, offices away from Headquarters and regional commissions interviewed (9 out of 20) felt that the Office of Human Resources Management did not adequately take into consideration the inputs they provided on policy development and revision from the implementer perspective.

There was no mechanism for ensuring policy changes were responsive and coherent

31. No mechanism existed for making policy changes in response to common practice. The administration of temporary appointments was a notable example. The administrative instruction on the administration of temporary appointments (ST/AI/2010/4/Rev.1) only allowed initial appointments of less than one year, even when temporary vacancies of up to two years may be created for mission assignments or special leave, and initial appointments could be renewed “exceptionally” for up to another year. Data collected from the executive offices, offices away from Headquarters and regional commissions showed that during the 12-month period from October 2016 to September 2017, at least 525 temporary appointments were exceptionally renewed beyond 364 days in accordance with the administrative instruction. At least 15 requests for extensions over 729 days, all coming from the Department of Management, and at least 84 requests for a reduced break-in-service before starting a new temporary contract, were approved as exceptions to the Staff Rules. However, the Office of Human Resources Management did not monitor discretionary actions, including renewal of temporary appointments beyond 364 days, and lessons learned from using discretionary actions and exceptions did not trigger policy revisions. A 2017 OIOS audit similarly found that policy development and revisions were not evidence-based.²⁴

32. A mechanism for identifying gaps and facilitating coherence within the human resources policy framework was lacking; the 2017 OIOS audit reported no proper framework to review and monitor gaps in policies and procedures. The process for promulgating new administrative issuances did not involve a systematic review of the existing policies to check for measures that were inconsistent with the new policy or detrimental to its goals.²⁵

²⁴ OIOS audit of the process of promulgating administrative issuances in the United Nations Secretariat (report 2017/064), 29 June 2017.

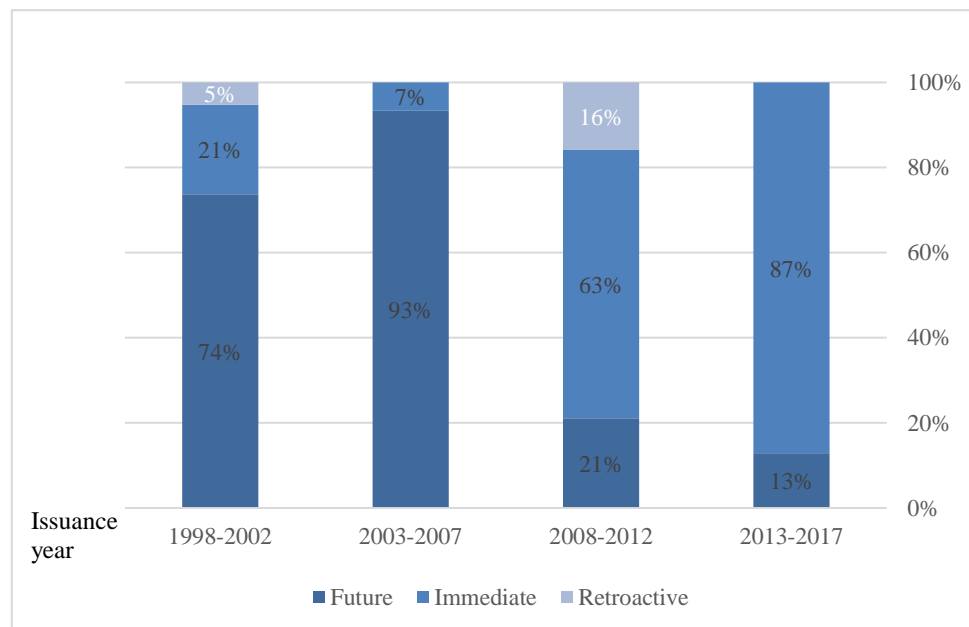
²⁵ Workflow on the promulgation of human resources related administrative issuances (Secretary-General’s bulletins, administrative instructions and information circulars), 10 November 2017, received from the Policy and Conditions of Service Section of the Human Resources Policy Service.

Human resources policies and procedures were increasingly issued with little preparation time for implementation and with limited communication

33. New or revised policies and procedures were increasingly issued without preparation time for those implementing them or for affected staff (see figure V).

Figure V

Administrative instructions are increasingly issued with immediate enforcement



Source: OIOS analysis of human resources related administrative instructions in force as at 31 December 2017.

34. The Office of Human Resources Management had not communicated new or existing policies and procedures to staff in a timely manner. The 2017 OIOS audit found that information circulars were not consistently used to communicate key rules, policies and procedures to staff. The coverage and timeliness of iSeek news articles on human resources policies and procedures were also inadequate. In 2017, the Office posted 29 global and 9 New York-specific articles on iSeek that covered human resources topics. Only six of them featured policies or procedures. The new administrative instruction on unsatisfactory conduct and investigations, issued on 26 October 2017 with immediate enforcement, was not announced on iSeek until 3 January 2018. Some Department of Management-Office of Human Resources Management clients and Department of Management staff interviewed also noted a lack of adequate explanations of policy rationale, including in communicating policy interpretation and decisions regarding discretionary actions and exceptions.

Resources devoted to human resources policy development were limited

35. The Human Resources Policy Service within the Office of Human Resources Management was headed by a Chief at the D-1 level reporting to the Assistant Secretary-General, unlike the other three units within the Office, which were each headed by a director at the D-2 level. The Policy and Conditions of Service Section, which was responsible for policy development, amendment, guidance and interpretation and servicing of the International Civil Service Commission and intergovernmental meetings, had six Professional posts (1 P-5, 4 P-4 and 1 P-2) and

three General Service posts in 2017.²⁶ With its small staff, the Section was overwhelmed with implementing changes mandated by the General Assembly and supporting reforms.

C. The delegation of authority framework on human resources has lacked clarity and contributed to inefficiencies, and there has been little monitoring

The delegation of authority framework has not been updated

36. The framework for delegation of authority was outdated, despite several efforts to update it. Its main administrative instruction was promulgated in 1989 and has not been significantly revised since then. A guidebook on delegation of authority was started in 2005 but not completed, and a comprehensive review submitted by the Office of Human Resources Management to the Executive Office of the Secretary-General in 2011 resulted in the promulgation of a Secretary-General's bulletin in 2015 that covered only the authority retained by the Secretary-General.

Clarity and consistency have been lacking, leading to inefficiencies

37. Department of Management-Office of Human Resources Management clients were unclear about the human resources authorities delegated to them. This result had also been reported in the 2008 OIOS evaluation of the Office of Human Resources Management and was still a concern. Of the 27 staff of executive offices, offices away from Headquarters and regional commissions who commented on this issue during interviews, 20 reported they were unclear on the authorities delegated to them. Some examples of where clarity was lacking included the special post allowance, appointments at the D-2 level, and confusion on the roles for executive offices and the Office within the former Umoja Headquarters Deployment Group. This view was also shared at a higher level, with 4 out of 19 heads of departments/offices survey respondents mentioning the shortcomings of the delegation of authority framework and the need for revision, simplification and increased accountability. The 2017 OIOS audit described how Office of Human Resources Development officers themselves were not clear about their own delegated authority and did not receive adequate guidance from senior staff in the Office.

38. The lack of a central repository on delegations has further contributed to lack of clarity. Out of 311 delegated decisions derived from the Staff Regulations and Rules,²⁷ 33 per cent were disseminated by memorandum and facsimile. The Office of Human Resources Management maintained only printed copies of these individual memorandums and the numerous written communications responding to specific clarification requests, which made fast and easy retrieval challenging. Thus, the Office and its clients needed to search manually through past correspondence to confirm existing arrangements of delegations. Compounding this challenge was significant reliance on institutional memory on past decisions taken; when staff left, there was a risk of losing their knowledge, especially if information on delegation of authority was in personal emails and files and not passed to new staff.

39. Inconsistencies in the delegation of authority have led to inefficiencies. For example, according to [ST/AI/2013/4](#), the Office of Human Resources Management

²⁶ Excluding one P-3 and one General Service post belonging to the Section that were being temporarily loaned to other parts of the Office of Human Resources Management from May 2016 to December 2017.

²⁷ Working document as at 10 September 2017 provided by the Office of Human Resources Management on 20 November 2017.

should clear the reengagement of former or retired staff as consultants or individual contractors. However, the United Nations Office at Geneva indicated that several entities, including itself, the United Nations Conference on Trade and Development and the Office for the Coordination of Humanitarian Affairs field offices, exercised full delegation on the administration of consultants and individual contractors, and that the Office at Geneva had not sought clearance from the Office of Human Resources Management for the reengagement of former or retired staff as consultants or individual contractors. Another example of inconsistency on delegation of authority between New York-based entities and offices away from Headquarters was on the approval for outside occupation or employment of staff. The lack of clarity produced significant administrative back-and-forth between the Office of Human Resources Management and clients, resulting in inefficiency owing to the length of time needed to reach agreement. Two heads of departments/offices surveyed also volunteered that the delegation of authority was too centralized.

The Office of Human Resources Management did not systematically monitor the use of delegated authority

40. Furthermore, the Office of Human Resources Management has not sufficiently monitored the exercise of delegations of authority across the Organization and responsibility for the monitoring of delegated authorities was diffused within the Office. The Office only facilitated self-monitoring by departments and offices of a set of indicators through HR Insight and the human resources management scorecard dashboard. Despite the implementation of Umoja, human resources reporting was limited and business intelligence reports, which could support the monitoring function by providing trends and comparison of practices across the Secretariat, were not yet available. The 2017 OIOS audit also noted that the Department of Management-Office of Human Resources Management lacked a monitoring information system that would enable it to detect unauthorized exceptions.

D. The Office of Human Resources Management has made progress on individual components of talent management, but shortcomings remained and integration was lacking

The Office of Human Resources Management developed the basic tools for and supported implementation of workforce planning pilots, but workforce planning has not gained traction in the Secretariat

41. The Office of Human Resources Management developed the tools to implement workforce planning, including a draft methodology in 2014 and a revised planning user guide in 2017. These tools meet industry standards: they comprehensively lay out the process and information in a straightforward manner and follow a model similar to other international organizations, including the World Bank. For example, the Secretariat process involves classifying the workforce into critical, core, support and misaligned roles or roles that need review; if critical positions are left vacant, there is a risk to effective programme delivery. The World Bank similarly identifies “mission critical” positions that are key to programme delivery. To gather lessons on good practices in applying workforce planning, the Office supported the implementation of a pilot project in the Medical Services Division and 14 peacekeeping missions. The pilot project was demonstrated to be useful in identifying areas where skills upgrading would be needed to keep the workforce in line with future needs.

42. Despite this progress, however, uptake in the rest of the Secretariat has been minimal.²⁸ The Secretary-General has expressed a desire to see a robust workforce planning process mainstreamed into each United Nations entity, but apart from the pilot project in the Medical Services Division and limited workforce planning concerning positions where staff were retiring as part of mobility exercises for the Political, Peace and Humanitarian Network, no other pilot has been conducted in a non-field environment. Interviews with staff involved in the pilots and other Department of Management senior staff revealed four possible explanations for this: workforce planning was not perceived by programme managers as an essential element of broader strategic planning; responsibility for promoting workforce planning was not at a sufficiently senior level; dedicated resources within the Office of Human Resources Management were lacking; and managers ultimately did not have the authority to implement all recommendations from the planning, such as creation, elimination or movement of posts or redeployments of staff to other areas of the Secretariat.

Recruitment and selection policies, processes and practices have not fully supported the hiring of the best talent for the Organization

43. The length of the recruitment timeline continued to be a challenge. The Organization was far from the target of 120 days.²⁹ Overall timelines for non-roster recruitment increased from 220 days in 2014 to 254 days in 2016.³⁰ In the senior managers' compacts, a target for this stage of the process was set to be 55 days for departments and offices with partial delegation of authority, while those with full delegation had a target of 83 days for all the steps under their authority.³¹ In 2016, no single office or department achieved its targets. Furthermore, the 24 entities for which data were available on iSeek reported an increase in the number of days under their authority between 2015 and 2016.³² Recruitment from rosters achieved the 120-day target, and 95 per cent of manager survey respondents viewed rosters as useful. However, the majority of recruitment continued to be non-roster: only 21 per cent of manager survey respondents said they had used it in their last recruitment.

44. Department of Management-Office of Human Resources Management clients reported that lengthy timelines had negatively affected the delivery of work and recruitment of the best candidates. In interviews, staff in the regional commissions, offices away from Headquarters and Department of Management stated that recruitment was a time-intensive process that ultimately detracted from their substantive work. In the manager survey, a majority (89 per cent) stated lengthy recruitment had affected their ability to deliver work programmes to some or a large extent. They volunteered that prolonged recruitment exercises had prevented the Organization from hiring the best candidates, who often accepted other job offers because of the delays.

45. Overall, the executive offices and regional commissions did not consider the Office of Human Resources Management to be effective in supporting recruitment; of 14 staff that responded to this question, half (7) rated that support as poor. In an attempt to further facilitate recruitment, in 2013 the Office implemented a pilot project using Internet-based pre-selection tests with the goal of reducing timelines

²⁸ Excluding the Department of Field Support, which was using workforce planning, and the Department of Safety and Security, which included workforce planning as a 2017 priority.

²⁹ The target of 120 days was set by the Secretary-General in his report contained in document [A/55/253](#) (dated 1 August 2000) and [A/55/253/Corr.1](#) in the context of the old selection system.

³⁰ Data from HR Insight. In document [A/71/323](#), 239 days were reported for 2015.

³¹ These targets only applied to selections under [ST/AI/2010/3](#).

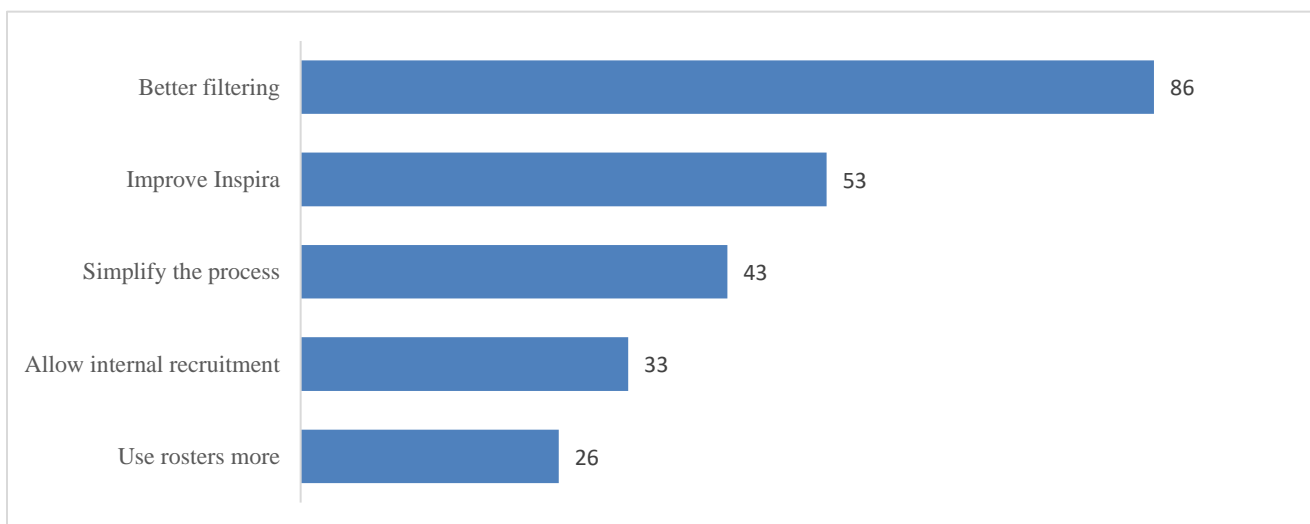
³² OIOS analysis of iSeek senior managers' compacts and assessments for 2015–2016.

under the authority of managers.³³ An internal assessment concluded that the test had reduced the pool of applicants by 89 per cent and recruitment times by around 30 days.³⁴

46. Figure VI shows surveyed managers' suggestions on the recruitment process. In their most recent recruitment, they reported receiving, on average, more than 100 screened-in personal history profiles for review; for P-3 positions, the average was 176.³⁵ In interviews with representatives of executive offices, offices away from Headquarters and regional commissions, there was concurrence that the in-built eligibility filtering mechanisms in Inspira did not work and the number of candidates they received was excessive. They stated the burden of candidate assessment was compounded by painstaking procedures required by the Office of Human Resources Management, such as providing justification on why each applicant was not selected, even for candidates clearly not meeting basic requirements.³⁶

Figure VI

Various improvements volunteered by managers concerning recruitment (out of 485 managers who volunteered a suggestion)



Source: OIOS manager survey.

47. Managers responding to the survey stated they thought the requirement of opening all vacancies to both internal and external candidates was not always the best selection approach. A benchmarking study by the Joint Inspection Unit (JIU/REP/2012/4) found the Secretariat was the only entity of the United Nations system, apart from the United Nations Children's Fund, that excluded an initial scan of internal talent.³⁷ UNDP and the Office of the United Nations High Commissioner for Refugees (UNHCR), for example, initially post all vacancies except for entry-

³³ The pilot was implemented in 2015 on 11 job openings in the Management and Administration Network; a modified version was used for staff selection and managed mobility in the Political, Peace and Humanitarian Network.

³⁴ Assessment project report on the piloting of unproctored Internet-based ability testing in the United Nations staff selection system, 15 March 2016.

³⁵ This number was less than quoted in A/71/323: "hiring managers are required to review from 200 to 400 applications for positions at the P-3 level and up to 800 for positions at the P-4 level."

³⁶ Starting in December 2017, hiring managers were no longer required to give ratings in the areas of academics, work experience or language, or provide comments for applicants.

³⁷ The previous staff selection system (ST/AI/2002/4) included an initial period of 15 or 30 days to consider internal lateral moves or promotions.

level posts internally, and fill them through internal promotion, transfer or reassignment, undertaking external recruitment exceptionally for specific categories or skills when there are no suitable internal candidates.

Despite initiatives to improve performance management, the system continued to be viewed as mechanical and devoid of meaning

48. The Office of Human Resources Management made strides in closing knowledge gaps related to performance management, and its support in this area was rated the most highly. In interviews, representatives of executive offices, offices away from Headquarters and regional commissions highlighted the utility of the coaching and online videos on how to conduct difficult conversations. The Performance Management and Development Learning Programme for Managers and Supervisors, with a 78 per cent participation rate,³⁸ was provided during interviews as an example of a training programme of good quality. The human resources portal, launched in 2015, offered a wealth of information on performance management. The data was comprehensive and organized by role with dedicated guidance for staff members, first reporting officers, heads of departments/offices and others. The learning catalogue offered options on different topics of performance management, such as setting performance goals, the midpoint review and addressing performance issues.

49. Compliance rates with e-performance were high across the Secretariat, with an average of 90 per cent reported in 2016–2017.³⁹ There were, however, variances among entities and by staff category. In 2014, completion of e-performance was included in the senior managers' compacts with a target of 100 per cent; in 2016, of the 32 Secretariat entities reporting on the compacts, 15 had a completion rate of between 90 and 100 per cent. In the assessment of senior managers' compacts of 2016, the Department of Management, with 60 per cent, was one of the entities with the lowest rate of completion.⁴⁰ By category, General Service staff had the highest completion rate with 93 per cent and staff at the director level had the lowest with 74 per cent.

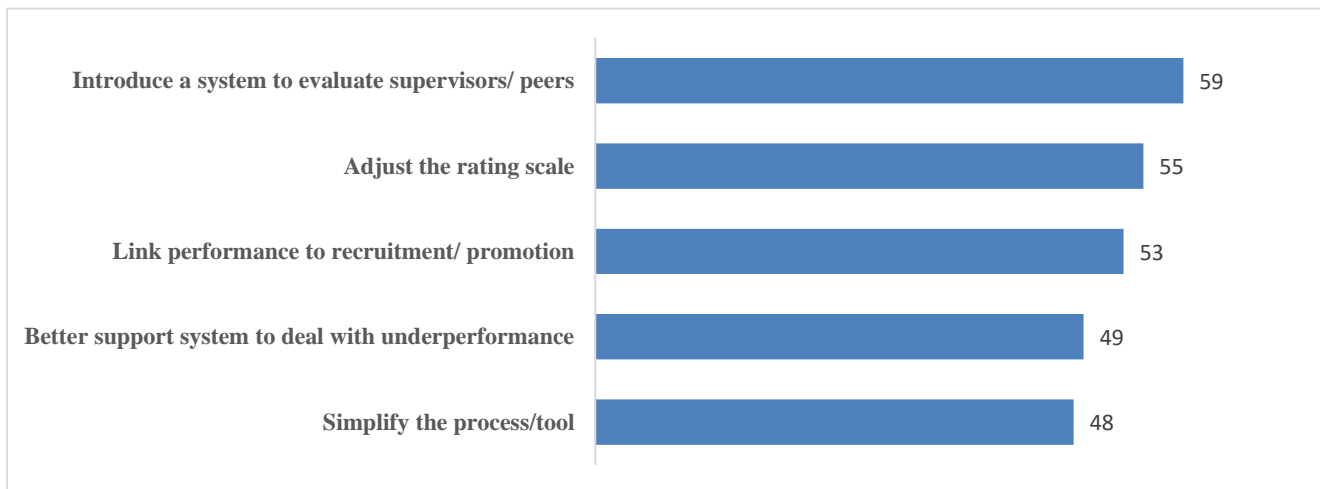
50. The performance management system itself was assessed poorly by its users. In interviews with Secretariat entities and units outside of Headquarters, offices away from Headquarters and Department of Management staff, the three most frequently mentioned concerns included the lack of linkages between performance management and other components of talent management such as recruitment or career development, managers' perception of it being a mechanical system, resulting in not taking it seriously, and an active avoidance of dealing with underperformance. In the manager survey, respondents suggested several improvements to the performance management system, shown in figure VII. Human resources practice in other organizations, including the World Bank, has been to move away from a formalized performance system and instead promote a culture of continuous feedback.

³⁸ OIOS manager survey.

³⁹ Office of Human Resources Management, performance management overview, 2016–17 cycle, September 2017.

⁴⁰ Based on 32 departments/offices reporting in senior compact assessments in 2016. The completion rate for the Department of Management, according to HR Insight, increased to 75 per cent in 2017.

Figure VII
Changes volunteered by programme managers for improving performance management (out of 434 managers who volunteered a suggestion)



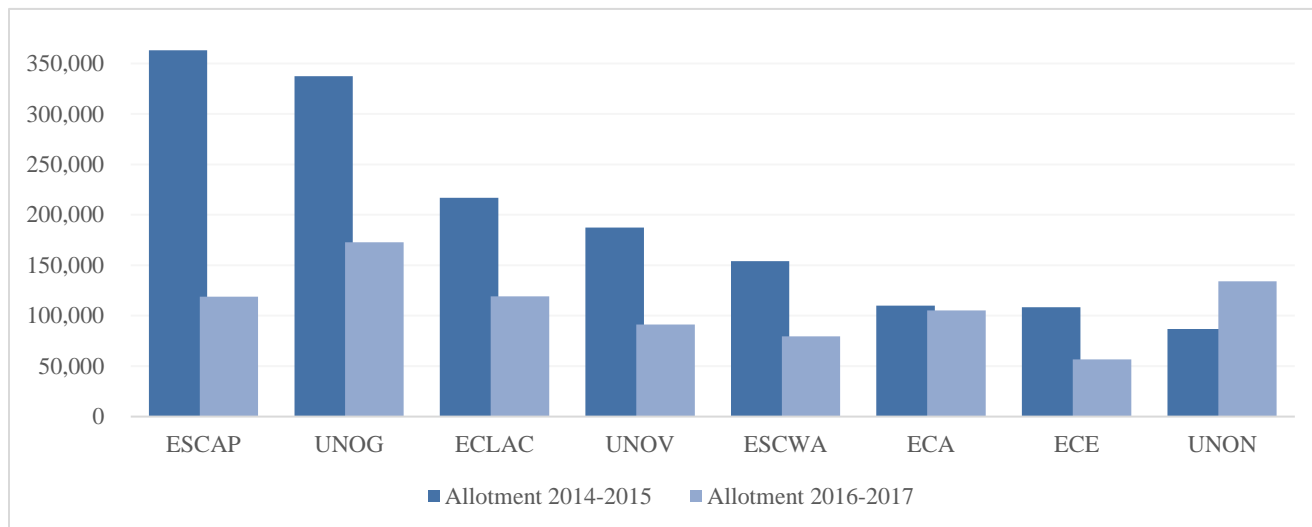
Source: OIOS manager survey.

Investments in the training and development of Secretariat staff have been low, although the Department of Management has introduced cost-effective delivery options

51. Responsibility for development and delivery of learning was dispersed among Secretariat entities. The Office of Human Resources Management was responsible for corporate programmes and for disbursing the resources for decentralized learning programmes, which had been decreasing, as shown in figure VIII. The Office also noted that its learning budget had been utilized for some other priority areas over the past two bienniums, directly affecting the resources allocated for staff development. More than half of the executive offices and regional commissions (8 out of 15) considered the investment in learning and staff development in the Secretariat to be inadequate. In interviews with Department of Management staff, 15 of the 34 respondents specified that the budget for learning activities was too low.

Figure VIII

Training funding decreased from 2014 to 2017 in all but one of the offices away from Headquarters and regional commissions



Abbreviations: ECA, Economic Commission for Africa; ECE, Economic Commission for Europe; ECLAC, Economic Commission for Latin America and the Caribbean; ESCAP, Economic and Social Commission for Asia and the Pacific; ESCWA, Economic and Social Commission for Western Asia; UNOG, United Nations Office at Geneva; UNON, United Nations Office at Nairobi; and UNOV, United Nations Office at Vienna.

52. The Office of Human Resources Management has made efforts to strengthen staff learning despite these budget constraints. For example, the Office has introduced cost-effective learning options such as Lynda, an online learning platform that is provided free of charge to staff and is accessible regardless of duty station; its use increased from 3,700 active users in August 2016 to 9,955 in January 2018.⁴¹

53. Nevertheless, opportunities for enhancement remained, particularly with regard to management and human resources training. The Management Development Programme, which is administered by the Office of Human Resources Management and is aimed at mid-level managers, will be phased out in 2018,⁴² while in contrast, in UNHCR and UNDP, management and leadership development ranks high on the learning agenda and both organizations have management certification programmes for staff at the P-3/P-4/P-5 level. On human resources, 11 Department of Management staff interviewed cited the need to recognize human resources as a separate profession and therefore provide certification and/or learning opportunities to ensure staff working in this area have the competencies needed. UNDP, for example, provides a structured online programme to its human resources practitioners.

Staff felt unsupported in outlining a career path in the Secretariat

54. Department of Management-Office of Human Resources Management clients did not believe the Secretariat provided adequate career development for staff. The career support programme provided all Secretariat staff with coaching and development support. In the survey of heads of departments/offices, however, career development was the human resources function rated the lowest, with 9 out of 19

⁴¹ Pilot checkpoint August 2016 (https://hr.un.org/sites/hr.un.org/files/Pilot_Checkpoint_Lynda_Aug2016.pdf). 2018 data point provided in an email communication with the Department of Management in January 2017.

⁴² A new modality which was not yet finalized will replace the Management Development Programme.

regarding it as poor or very poor. Of particular note in this regard was the young professionals programme: staff recruited through this system were selected through a demanding and rigorous process,⁴³ yet their career development was not always championed. The managed reassignment programme for staff recruited through the young professionals programme⁴⁴ has the goal of providing this group with orientation, training, mobility and career support, yet the rationales for staff movement decisions made by the Office of Human Resources Management through the managed reassignment programme were not shared with managers.⁴⁵ In addition, in the period from July 2014 to June 2015, only 4 out of 143 young professional programme staff at the P-2 level were promoted to P-3, and in the period from July 2015 to June 2016, no P-2 young profession programme staff out of 184 such staff were promoted to P-3.⁴⁶ In the 2017 Young United Nations initiative global ideas survey,⁴⁷ more career development support was cited as the most important area for human resources reform.

55. The Secretariat does not compare favourably with other international organizations and for-profit companies on career development. Many of these organizations devote a considerable amount of time to identifying designated high performers.⁴⁸ The World Bank and UNDP policies, for example, state that staff have a duty to develop themselves, but that the organization has the responsibility to communicate clearly the knowledge, skills, abilities and experience required for career progression. Furthermore, the World Bank identifies internal talent and develops high performing individuals in anticipation of promotion.

The individual components of the talent management framework were not integrated

56. Despite the talent management model, the four components of the talent management framework discussed above were not well linked. Workforce planning was not used for targeted recruitment to meet organizational needs, recruitment and career development were not tied to performance, and learning largely occurred in a vacuum. As one example, more than one third of managers surveyed (38 per cent) acknowledged they had not used prior performance appraisals in their most recent recruitment because the information was not deemed useful and/or they did not know the information was available. Similarly, performance information was not used for career development and information on a staff member's training and development efforts was not typically assessed when considering their career progression. The Office of Human Resources Management reported that to better link learning with organizational priorities, it had undertaken in 2017 a comprehensive learning needs assessment so as to better identify priorities and cross-cutting needs to make more strategic use of resources for delivering learning. Furthermore, the Office indicated that it was working on developing a new management and leadership model, which would better link performance management expectations with supportive learning programmes and would be reflected in the recruitment processes.

⁴³ In 2011 there were 34,000 total applicants, of which 96 passed the written and oral tests.

⁴⁴ As well as the national competitive examination and the General Service to professional category examination.

⁴⁵ [ST/AI/2001/7/Rev.2](#), para. 5.3, established that the matching exercise under the managed reassignment programme would be conducted with a view to maximizing the number of reassignments, taking into account the preferences expressed by the staff member and the hiring manager, as well as human resources organizational priorities.

⁴⁶ Analysis of data from Umoja.

⁴⁷ The survey was developed by Young United Nations Agents for Change, a network of young professionals working across the system.

⁴⁸ An exception in the Department of Field Support Field Personnel Division was a programme introduced in 2015 aimed at grooming candidates with high potential.

V. Conclusion

57. Effective human resources management begins with the recognition that it is not embodied in robust policy statements, but that it starts at the top as an overarching commitment viewed as foundational to organizational success. Given the complexity and magnitude of its work, as well as the goals it seeks to attain, this is especially critical for the United Nations Secretariat. With a vast workforce spread globally across multiple regions, and a myriad of programmes encompassing normative, operational and research work, the United Nations needs to ensure that it has the staff it needs, with the right skills and the necessary professional profiles. This has never been truer than with the introduction of the 2030 Agenda for Sustainable Development, as the United Nations must ensure that it has the competencies and capacity needed to support Member States in their achievement of the Sustainable Development Goals.

58. Human resources management in the Secretariat has been characterized by a dynamic environment in which priorities have shifted and reform has been continuous. The Office of Human Resources Management provided critical human resources support to the Organization in a complex environment that is fluid and highly regulated. In Article 101, the Charter states that the paramount consideration in the employment of the [Secretariat] staff shall be the necessity of securing the highest standards of efficiency, competence, and integrity. That same article also requests that due regard be paid to the importance of recruiting the staff on as wide a geographical basis as possible; subsequent organizational reforms have also placed an emphasis on gender balance and mobility.

59. Compounding these shifting priorities has been the multitude of human resources policies, many outdated and difficult to understand, as well as a talent management framework that has lacked cohesion and direction. A focus on compliance at the expense of flexibility, as well as an approach that has at times lacked adequate consultation as well as sufficient consideration to the needs of the field, has resulted in a human resources environment that has often stifled more than enabled staff to deliver their work programme and achieve results.

60. The Secretary-General has embarked on an ambitious reform agenda that introduces a new paradigm for human resources management to achieve greater clarity, focus and results. Many of the issues identified as needing attention and corrective action in this evaluation are being addressed in the reform effort, including the updating, streamlining and simplification of policies, greater empowerment and accountability of managers through enhanced clarification and delegation of authority, and heightened consideration of and support for the needs of the field.

61. Member States expressed general agreement with the reform framework at the end of 2017, and stressed that the main purpose of any such reform should be better performance of the Organization. Any steps taken to enhance human resources management must thus be linked and mutually reinforcing so they come together for enhanced delivery of the Organization's mandates. The staff of the United Nations Secretariat have always been and will always be its most valuable asset, an asset that must be valued and supported in order to perform the invaluable work of the Organization.

VI. Recommendations

Recommendation 1 (result B, paras. 23–25, 31, 32 and 35)

62. The Department of Management-Office of Human Resources Management should support the ongoing simplification and streamlining of policies project by incorporating the following components:

- (a) Assessment of existing policy gaps;
- (b) Review of the overall policy framework to eliminate redundancy and ensure cohesion;
- (c) Identification of resource requirements for policy development, review, revision and communication.

Indicator of achievement: A streamlined human resources policy framework that takes into account all of the components in (a)–(c) above.

Recommendation 2 (result B, paras. 26–28, 33 and 34)

63. The Department of Management-Office of Human Resources Management should strengthen the procedure for promulgating new or revised administrative issuances by:

- (a) Undertaking a regular review of the use of discretionary actions and exceptions to identify needs for policy development or revision;
- (b) Reviewing existing policies to check for measures that are inconsistent with new or revised policies;
- (c) Identifying the necessary preparatory work for implementation;
- (d) Issuing timely communications to staff, including concerning the policy rationale.

Indicator of achievement: Revised procedure for promulgating new or revised issuances integrating the issues in (a)–(d) above.

Recommendation 3 (result C, paras. 36–40)

64. The Department of Management-Office of Human Resources Management should strengthen human resources management by establishing clear delegation of authority through a new framework that includes the strengthening of monitoring and reporting.

Indicator of achievement: A framework for delegation of authority that includes monitoring and reporting.

Recommendation 4 (result D, paras. 41 and 42)

65. The Department of Management-Office of Human Resources Management should further strengthen workforce planning by undertaking an information campaign led by senior management of the Office of Human Resources Management to reintroduce the workforce planning model to departments and offices, including communicating specific benefits gained when undertaking such planning.

Indicator of achievement: Information campaign conducted for workforce planning.

Recommendation 5 (result D, paras. 46 and 47)

66. Within the existing parameters of General Assembly mandates, **the Department of Management-Office of Human Resources Management should strengthen the components/requirements within the selection and recruitment policy by aligning them with good human resources practice.**

Indicator of achievement: Proposal for changes to the current selection and recruitment policy for discussion during the seventy-third session of the General Assembly.

Recommendation 6 (result D, para. 53)

67. **The Department of Management-Office of Human Resources Management should recognize and enhance the Secretariat human resources community as a separate and critical organizational profession by, inter alia, establishing a certified training programme.** The training should lead to a certification for all human resources practitioners and include Secretariat-specific training and broader human resources theory and practice.

Indicator of achievement: An established human resources training programme.

Recommendation 7 (cross-cutting and result A, paras. 16 and 19)

68. **The Department of Management-Office of Human Resources Management should introduce specific measures to enhance its overall client orientation,** including a strategy for better identifying client needs, including the conduct of regular client satisfaction surveys, and effectively managing their expectations.

Indicator of achievement: Client orientation strategy.

(Signed) Heidi Mendoza
Under-Secretary-General for Internal Oversight Services
March 2019

Annex*

Comments received from the Department of Management

Further to your memorandum of 6 March 2018 on the above-mentioned subject, I am confirming the Office of Human Resources Management's acceptance of the recommendations contained in the draft report (IED-18-006) subject to our comments. I am also providing the attached management response – the recommendation action plan.**

Please also find attached the refined and final documentation of our informal comments on the OIOS draft response.**

I would like to take this opportunity to thank you and your staff for the work undertaken to produce this report.

* In the present annex, the Office of Internal Oversight Services sets out the full text of comments received from the Department of Management. The practice has been instituted in line with General Assembly resolution [64/263](#), following the recommendation of the Independent Audit Advisory Committee. The comments have been reproduced as received.

** On file with the Office of Internal Oversight Services.