



## **INTERNAL AUDIT DIVISION**

### **REPORT 2022/066**

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**Audit of operations in Nigeria for the Office of the United Nations High Commissioner for Refugees**

**The Representation needed to strengthen its coordination with key stakeholders, so they fund and support the delivery of services to persons of concern in line with the Global Compact on Refugees**

**28 November 2022**

**Assignment No. AR2022-111-01**

# **Audit of operations in Nigeria for the Office of the United Nations High Commissioner for Refugees**

## **EXECUTIVE SUMMARY**

The Office of Internal Oversight Services (OIOS) conducted an audit of the operations in Nigeria for the Office of the United Nations High Commissioner for Refugees (UNHCR). The objective of the audit was to assess whether the Representation in Nigeria was managing the delivery of services to persons of concern (PoCs) in a cost-effective manner and in line with UNHCR's policy requirements. The audit covered the period from 1 January 2020 to 31 December 2021 and included: (a) planning and resource allocation; (b) health; (c) food assistance; (d) livelihoods and self-reliance; (e) security from gender-based violence (GBV); and (f) procurement and contract management.

The Government of Nigeria has demonstrated its commitment but remains constrained in its capacity to implement the Global Compact on Refugees pledges centred around the provision of services to PoCs through its national systems. Inability to effectively mobilize funds from donors and insufficient support from humanitarian and development actors under the Global Compact on Refugees has impacted the Representation's delivery of services to PoCs.

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

- Strengthen strategic planning processes and implement an advocacy and coordination plan to increase the Government and donor support in finding sustainable protection solutions for PoCs.
- Implement an effective performance management system that measures progress in meeting strategic objectives and strengthen identification of key risks for mitigation.
- Update its strategy and related standard operating procedures (SOPs) to direct the cost-effective delivery of health services to PoCs; use lessons learned from the Refugee Health Insurance Scheme to improve related programmes; and recover excess payments effected under this scheme.
- Enhance controls over identification and distribution of cash for food to beneficiaries and review the modality used in effecting cash payments to reduce related costs.
- Conduct an impact assessment to inform its livelihoods strategy and SOPs and reinforce management oversight over related programmes.
- Update the GBV strategy and SOPs to drive and guide prevention, mitigation and response interventions and strengthen the collection and reporting of accurate data for programming and decision making.
- Strengthen compliance with UNHCR procurement guidance and ensure best value for money is obtained on purchases.
- Reinforce the due diligence conducted prior to delegating procurement to implementing partners, strengthen monitoring of purchases conducted by partners, and reduce amounts delegated to partners with identified fraud risks.

UNHCR accepted all recommendations and had initiated action to implement them. Actions required to close the recommendations are indicated in Annex I.

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# **Audit of operations in Nigeria for the Office of the United Nations High Commissioner for Refugees**

## **I. BACKGROUND**

1. The Office of Internal Oversight Services (OIOS) conducted an audit of the operations in Nigeria for the Office of the United Nations High Commissioner for Refugees (UNHCR).
2. The UNHCR Representation in Nigeria (hereinafter referred to as the ‘Representation’) was established in 1999 to provide refugees, internally displaced persons (IDPs) and other persons of concern (PoCs) with international protection and humanitarian assistance. As of 31 December 2021, Nigeria hosted 78,805 refugees and asylum seekers and an estimated 3.1 million IDPs. Ninety-five per cent of the refugees were from Cameroon and resided in the south-eastern part of the country. Forty-five per cent of these refugees resided in four refugee settlements (Adagom I, Adagom III, Okende and Ikyogen) and the rest in host community areas spread across four States. An estimated 2.2 million IDPs reside in the north-eastern part of the country in three states, with 43 per cent residing in about 300 camps and the rest in host community areas. As part of the IDP response, the Representation led the protection and co-led the camp management/shelter/non-food item clusters and assisted 599,528 of related PoCs in 2021.
3. The Representation operated in a challenging operating environment characterized by the restrictions caused by the COVID-19 pandemic and insurgencies and violence, particularly in the north-east. This not only impacted the implementation of key programme interventions such as livelihoods but also affected the Representation’s ability to meet PoCs in person and monitor projects directly. The Representation also faced resource constraints since Nigeria as a middle-income country attracted less funding from donors. As a result, the Representation was unable to meet the needs of PoCs.
4. The Representation was headed by a Representative at the D-1 level and, as of 24 February 2022, had 186 regular posts (49 professional and 137 national staff) and 28 affiliate workers. The Representative reported to the Director of the Regional Bureau for West and Central Africa (the Bureau). The Representation had a branch office in Abuja, two sub offices in Ogoja and Maiduguri and 15 field offices/units. The Representation recorded a total expenditure of \$47.9 and \$45.4 million in 2020 and 2021 respectively and this was nearly equally split between refugee and the IDP programmes. It also worked with 21 and 20 partners that implemented programme activities in 2020 and 2021 respectively, totaling about 70 per cent of the programme budget.
5. Comments provided by UNHCR are incorporated in italics.

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

6. The objective of the audit was to assess whether the Representation in Nigeria was managing the delivery of services to PoCs in a cost-effective manner and in line with UNHCR’s policy requirements.
7. This audit was included in the 2022 risk-based work plan of OIOS due to opportunities for UNHCR in Nigeria to advance the implementation of the Global Compact on Refugees (GCR) objectives and the relative high risks of operating in the country.
8. OIOS conducted this audit from April to July 2022. The audit covered the period from 1 January 2020 to 31 December 2021. Based on an activity-level risk assessment, the audit covered higher and medium risk areas and reviewed: (a) planning and resource allocation; (b) health; (c) food assistance; (d)

livelihoods and self-reliance; (e) security from gender-based violence (GBV); and (f) procurement and contract management. Through a review of the above-mentioned areas, OIOS drew conclusions on the effectiveness of performance, enterprise risk and partnership management in the Representation.

9. The audit methodology included: (a) interviews with key personnel; (b) review of relevant documentation; (c) analytical review of relevant data from the UNHCR enterprise systems; (c) sample testing of controls; and (d) visits to UNHCR offices in Abuja, Ogoja and Maiduguri and six partner offices; and (e) observation of programme activities in selected refugee and IDP settlements and sites in host community areas.

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

### **III. AUDIT RESULTS**

#### **A. Planning and resource allocation**

##### Need to strengthen strategic planning and coordination with key stakeholders to ensure PoCs access to sustainable solutions

11. The Representation only received about 50 per cent of its financial needs, and thus could not meet the needs of PoCs in different areas. For instance, the Representation could only afford to provide PoCs with food for the first three months of the year, with additional support provided after supplementary funding was received through resource mobilization later in the year. This called for strengthened strategic planning to prioritize the ever-increasing PoC needs as well as reinforced coordination with the host government and other agencies to meet those needs.

12. The Representation facilitated the government approval of a roadmap (2021-2025) to implement the GCR pledges made in 2019 which focuses on: (i) inclusion of PoCs in national development plans and budgets; (ii) strengthening the integrity of the asylum system; (iii) PoCs to access durable solutions; and (iv) addressing root causes of displacement in the region. The Government had by 2022 included PoCs in its development plans, and they enjoyed freedom to move and work. However, the Government's limited capacity to deliver services impacted PoCs' access to services offered under the national systems. For instance, its education and health facilities could not accommodate the doubling of populations in refugee hosting areas.

13. The Representation through its investment in infrastructure supported the Government's service delivery but it was not well coordinated and, in some instances, ineffective. For instance, the Representation constructed a school totaling \$22,000 which the Government did not recognize and thus did not allocate teachers to. In another school, attendance stood at less than 25 per cent because refugees could not afford to pay the nominal school fees charged.

14. Despite the expectation under the GCR that burdens and responsibilities for refugees would be shared, the Nigeria Humanitarian Response Plan only covered the north-east and no other crises such as the IDP situation in the north-west and the refugee influx from Cameroon. Other United Nations agencies and donors primarily focused on the IDP situation in the north-east, because of the size of the crisis, i.e., 2 million IDPs. The Representation made several presentations to the United Nations Country Team and other fora but was unable to generate the desired interest in its refugee programme and the GCR's burden-sharing agenda. Consequently, the Representation did not have the required support from the humanitarian

and development actors to implement and thereby meet its GCR objectives. The Representation also did not have a dedicated staff to coordinate the above process and ensure implementation of the GCR.

15. The limited involvement of other United Nations agencies and donors in the refugee programme put further pressure on the resource allocation. The Representation allocated over 70 per cent of programme resources to PoCs assistance e.g., food, health, livelihoods, shelter, non-food items and this included supporting 5 per cent of IDPs. This was contrary to the GCR vision of shifting from provision of assistance to ensuring PoCs have access to sustainable solutions and become self-reliant.

16. The ever-increasing needs in an environment characterized with limited stakeholder engagement and resource constraints called for reinforced strategic planning. However, the Representation did not have a multi-year, multi partner protection and solutions strategy and the annual plans did not provide a strategic direction nor longer-term perspectives on matters such as inclusion of refugees in government services. After the audit field work, the Representation prepared a multi-year plan (2023-2025) which brought key stakeholders together to find sustainable protection solutions for PoCs. It was yet to update sector strategies in key areas like livelihoods/self-reliance, and durable solutions.

17. Additionally, the FOCUS system lacked credible information to measure performance and assess effectiveness of programme implementation. The Representation: (i) did not set performance targets for 26 outputs; (ii) did not adjust targets to reflect changes during the year; (iii) could not explain inconsistencies in the results reported; and (iv) had not analyzed reasons and so did not remedy non-performance. For instance, no action had been taken to address rape survivors' low access (25-45 per cent) to post-exposure prophylaxis. Furthermore, the Representation's register did not reflect key risks such as the impact of the COVID-19 pandemic on the self-reliance of refugees nor the limited involvement of development actors in the refugee programme. It also needed to ensure that proposed measures were effective in mitigating identified risks.

18. If the above matters are not addressed, the Representation will remain ineffective in delivering services to PoCs and ensuring they access self-reliance and solutions as intended.

**(1) The UNHCR Representation in Nigeria should implement: (a) an advocacy and coordination plan to increase the Government and development agencies' support to implementing the Global Compact on Refugees pledges; and (b) key sector strategies to drive the achievement of its vision.**

*UNHCR accepted recommendation 1 and stated that an advocacy and coordination plan will be developed, building on the actions already undertaken.*

**(2) The UNHCR Representation in Nigeria should implement: (a) an effective performance management system to measure its progress in achieving its strategic objectives; and (b) strengthen its identification and mitigation of risks that impede the achievement of its strategic objectives.**

*UNHCR accepted recommendation 2 and stated that the Nigeria operation has developed a monitoring and evaluation plan for its multiyear strategy, where it defines how, when and with what resources its results will be monitored and evaluated. This monitoring and evaluation plan will be implemented and followed up to improve the performance monitoring system. Risk management integration in the operation processes is in progress, as the operation has engaged with continuous support from the Bureau technical team in multiple reviews of the risk register to ensure effective risks identification and mitigation measures are in place.*

## B. Health

### Need to address gaps in health service delivery and conduct a post-implementation review of the Refugee Health Insurance Scheme

19. The Representation spent \$4.5 million in 2020/2021 on the provision of health care services through the Refugee Health Insurance Scheme (RHIS) and infrastructural and staffing support to government health centers in refugee hosting areas. To deliver timely and quality health services to PoCs, the Representation needed to develop a strategy that prioritizes needs and directs the health programme and oversees its implementation by partners.

20. The Representation: (i) assessed the quality of infrastructure and service delivery by primary health centers; (ii) refocused its strategy to address the poor infrastructure at the primary health centers under the GCR framework; and (iii) introduced innovative tools such as the drugs renewal fund to provide services. This increased the number of PoCs accessing health care at PHCs from 21,882 in 2020 to 39,404 in 2021. The Representation's health strategy and SOPs were aligned to the UNHCR's Global Public Health Strategy (2021-2025) but needed to be updated to remove elements related to the now defunct RHIS.

21. The Representation through the RHIS provided primary and some secondary health care to 25,000 refugees in 2020 and 2021 totaling \$1.4 million (31 per cent of the health budget). The only report available was for the period 17 March to 16 July 2021 and it noted that 10 per cent of those insured sought assistance for primary health care, with the remaining 90 per cent unable to access health facilities due to their remoteness and lack of awareness of the insurance scheme. The refugees who sought assistance expressed dissatisfaction at the quality of services received citing: (i) non-availability of prescribed medicines at facilities; (ii) poor attitude of healthcare providers; and (iii) the lack of a dedicated telephone for communicating urgent issues. In contrast, in 2021, the 39,404 PoCs sought health assistance at PHCs, which was substantially more than the hospital visits by insured patients at health service providers.

22. The above issues arose because the Representation did not conduct proper due diligence prior to introducing the scheme, including a cost benefit analysis and assessment of available national health facilities to provide services. Consequently, its plans to have refugees pay their premiums within five years did not materialize due to their limited access to livelihoods programmes. Additionally, the Representation did not follow competitive procedures in selecting the vendor for the RHIS, citing urgency as the justification. It then extended the management organization's contract a couple of times until January 2022 without competitive bidding.

23. The Representation did not maintain proper records on the RHIS and lacked key documents to inform its decision making and oversight. For instance, the Representation lost visibility on the performance of the scheme because the management organization was not required to submit statements of accounts and it did not consistently provide periodic narrative reports. The Representation also did not review the reasonableness of the fees charged by the health management organization and thus was not aware that the RHIS only spent 65 instead of the agreed 85 per cent on health services. There was also no clarity on where the balance of funds was spent since the management organization did not maintain proper records. Additionally, the health management organization did not pay all capitation fees to facilities that provided health services to PoCs. The audit identified an overcharge in fees amounting to \$54,500 between 17 March to 16 July 2021.

24. The Representation subsequently terminated the agreement with the vendor in January 2022 and was at the time of the audit promoting the inclusion of refugees in government systems. In the meantime, the Representation continued to support government health centers in refugee hosting areas with supplies,

medical staff and paid for medicines required by refugees. OIOS visited three health centers and was generally satisfied with the management of the one in Adagom. However, the partner in Okende settlement had not paid the three clinics for the medicines that had been issued to refugees under the drugs renewal fund. This was due to delays by the Representation in paying the partner's next disbursement and it resulted in medicine stock outs in the facilities. Also, an additional building for the health center in Okende for which construction was completed in December 2021 was not in use by May 2022.

25. The Representation's weak monitoring of the health management organization resulted in possible overcharges and delivery of sub-optimal health services to refugees. The Representation needed to update its health strategy after the termination of the RHIS and adopt a strategy on how it intended to achieve full inclusion of refugees in government provided services.

**(3) The UNHCR Representation in Nigeria should: (a) update its public health strategy and procedures which ensure full inclusion of refugees in national systems; (b) prepare a lessons learned document on the implementation of the Refugee Health Insurance Scheme to guide and improve future related programmes; and (c) reconcile payments made by the insurance company and recover any overpayments.**

*UNHCR accepted recommendation 3 and stated that the Nigeria operation health intervention is based on the Bureau general strategy with main objectives of mainstreaming PoCs health services into existing government structures. However, the temporary measure to provide insurance cover to refugees through a private health service provider suffered major challenges for implementation. Technical support is being provided by Bureau to properly close the previous arrangement after all requirements are taken into consideration. The Representation also agrees with the recommendation to prepare a lesson learned document.*

## C. Food assistance

### Need to review effectiveness and efficiency of food assistance delivery

26. The Representation provided food assistance to about 40,000 refugees amounting to \$7.9 million (28 per cent of the programme budget) through cash-based interventions (CBIs). In order to ensure the effective delivery of food to PoCs, the Representation needed to plan and monitor the implementation of the programme, so the assistance meets assessed needs and reaches intended beneficiaries and with an exit strategy in place when PoCs become self-reliant.

27. The Representation's efforts at the country and regional level to have another United Nations agency provide food in camps with at least 5,000 refugees as outlined in a global Memorandum of Understanding were unsuccessful and the Representation provided food to PoCs. Due to funding constraints, the Representation primarily provided food to PoCs in the settlements and even then, this was prioritized for three months of the year and only expanded after additional supplementary funding was received. Also due to funding constraints, the Representation was gradually reducing the cash assistance to about 40 per cent of the food basket value, and despite the great need, had not added any more PoCs (i.e., new arrivals) to the list from December 2021.

28. According to the Standardized Expanded Nutrition Survey and the post distribution assessment done at the end of 2021, food remained a critical need for refugees in the settlements. Forty-six per cent of all survey respondents reported that they did not have any other income and thus found the assistance inadequate to cover their needs especially considering the rise in food prices. Eighty-four per cent of



respondents also noted that food prices had increased but cash assistance remained unchanged since the last needs assessment in 2019. Furthermore, the cash was distributed late since it was dependent on the Representation's receipt of money. For instance, the April 2021 assistance was distributed between 23 August and 7 September 2021. As a result, refugees engaged in negative coping mechanisms thereby increasing their protection risks. For instance, 59 per cent borrowed money and 47 per cent reduced the number of meals consumed increasing the risk of malnutrition.

29. The Representation was supposed to target beneficiaries for food assistance based on their level of self-reliance. However, this was not done since it lacked data to support the targeting of PoCs. Furthermore, despite the 2019 needs assessment having concluded that refugees residing in host community areas were most at risk of not meeting their nutritional needs, the Representation was unable to provide them with assistance due to its funding constraints. The Representation noted that it planned to collect data for targeting purposes during an upcoming population verification exercise.

30. The 2019 exit strategy showed that food assistance would be gradually reduced to zero over 14-month period as refugees became self-reliant with the increase in their livelihood activities. However, the COVID-19 pandemic affected livelihoods and the Representation was not able to eliminate the food cash assistance as planned. It did however implement a gradual decrease from \$20 to \$6 per person per month at the time of audit; and this was done without considering the PoCs' level of self-reliance. While the continuation of food assistance was unsustainable, such cuts affected PoCs' lives as reflected in the nutrition survey that noted that stunting was on the rise.

31. The Representation paid \$600,000 to the partners that distributed the cash in the two-year period. The Representation directly distributed 40 per cent of the cash to refugee bank accounts from December 2021 at no additional cost. However, it had no plan to increase this direct transfer modality, which would reduce the transfer cost through partners. Furthermore, distribution in cash was time-consuming (happened over eight days), risky and put a lot of pressure on UNHCR field office and partner staff during the distributions. Additionally, the Representation maintained the beneficiary list in Excel, and it was thus prone to errors and unauthorized alterations. There was also no documentation to justify the PoCs that were added to beneficiary lists nor evidence that protection staff performed proper checks prior to making these changes. This documentation was not accessible because it was stored in staff emails instead of files for accountability purposes.

32. Although the Representation reported in its performance management system an overachievement against target on food assistance in 2021, this was incorrect because the target related to three-month targets and not the whole year. Besides, the assistance was distributed late and at 40 per cent of the food basket, which was not captured in the performance management system but relevant for refugees. Actions to mitigate identified risks on CBI, i.e., the implementation of a targeting strategy and the change of the cash transfer modality, remained outstanding past their due date. The issues above called for a concerted effort by the Representation to revisit its strategy, implement targeting of the most vulnerable and transition to less costly distribution modalities. Otherwise, the food assistance programme will continue to have a limited impact on the lives of refugees.

**(4) The UNHCR Representation in Nigeria should ensure timely, cost-effective and targeted distribution of food assistance by: (a) updating the related strategy based on a comprehensive assessment of needs; (b) enhancing its controls over identification and distribution of cash to beneficiaries; and (c) reviewing its modality for cash distribution to reduce related costs.**

*UNHCR accepted recommendation 4 and stated that: (i) the operation has started with the verification exercise of Cameroonian refugees in September 2022, which is accompanied by a socio-economic*

*assessment at household level. Once completed the Representation will move to targeting beneficiaries by June 2023 and assist refugees who live both in settlements and in host communities. The verification will also be used to update the related strategy on CBI. (ii) The operation is in the process of finalizing the rollout of the UNHCR's CBI payment tool CashAssist that synchronizes data from proGres, MSRP and the financial services providers. It is envisaged that payments as of January 2023 will be processed through CashAssist which will enhance the controls over identification and distribution of cash to beneficiaries. (iii) As of quarter 2 2023, it is planned that e-transfer (bank accounts, mobile money) becomes the main delivery mechanism for the majority of the beneficiaries and this will reduce the implementation costs.*

## **D. Livelihoods and self-reliance**

### Assess the impact of ongoing livelihoods programme and use results to formulate strategy

33. The Representation spent \$5.6 million on livelihoods and economic inclusion interventions, covering 22,921 beneficiaries in 2020/2021. Interventions were implemented through seven partners and included agricultural production, livestock, technical/vocational training and provision of startup kits and support to micro, small and medium enterprises. To ensure the effective and efficient delivery of livelihoods activities, the Representation needed to plan, identify beneficiaries, support them with necessary expertise, monitor programmes and establish an exit strategy to avoid PoCs perpetuate dependence on humanitarian support.

34. The audit was only able to visit 27 out of its sample of 40 selected livelihood interventions in Adagom and Ikom because 13 project owners were not available at the time of the audit field work. None of these interventions had achieved the desired results. Eight of these livelihood interventions had been discontinued and 19 were operational (3 poultry pens and 16 fishery ponds). However, even the 19 operational projects were not making sufficient profits to sustain their businesses and support their families, and this raised questions about the viability of the businesses started by the PoCs. Additionally, the 95 hectares of land in Ogoja donated by the Government to PoCs in 2019 had not been put to use because of its distance from the settlement (4-5 km) as well as insecurity caused by land disputes with the neighboring community.

35. Furthermore, the Representation had not conducted socio-economic and market assessments to explore stakeholders' capacity to include refugees and support them with technical expertise. This would have ensured that planned interventions were of good quality and market-based, and created, strengthened and/or expanded partnerships that would provide technical and operational expertise to PoCs. Additionally, despite having acquired an expert in October 2020, beneficiaries complained that they did not have access to them nor required expertise at the partner level. For instance, the Representation handed over the management of the farm village in Ikom to a partner in 2022 with unresolved issues on the under-utilization of the facilities.

36. Additionally, in the absence of relevant assessments to support effective targeting of beneficiaries against set of criteria, the Representation's approved SOPs for livelihoods interventions in Ogoja in 2020 could not be operationalized. Partners did not match livelihood interventions to PoCs' profiles i.e., experience/education, economic status and location, and this increased the risk of their failure. It also resulted in beneficiaries continuously changing businesses, e.g., from market vending to poultry raising or farming to fishery and vice versa. Also, two beneficiaries were not using the sewing machine and electric ovens provided under the programme and instead continued using their old equipment.

37. Despite these interventions going on for years, the Representation had not designed, implemented, and maintained a country-specific livelihoods strategy to serve as a framework for directing its overall approach. It also had not conducted an impact assessment of the livelihood interventions to determine whether they were creating the desired impact of making PoCs more self-reliant. These aspects were important in ensuring linkages to other programmes and having an exit strategy to reduce PoCs' dependence on humanitarian support.

38. Gaps in the Representation's performance framework meant it did not have reliable data for decision making. Results of 4 of the 13 performance indicators contained errors. For example, the 'number of PoC receiving production kits or inputs for agriculture/livestock/fisheries activities' was reported as 3,200 instead of 2,000. The results reported against the 2020 indicators could not be traced to the source documentation. Also, no results were reported against the performance indicators 'number of PoC receiving cash/vouchers for business startup' and 'agriculture/livestock purposes' despite \$558,765 having been spent on these interventions.

39. These weaknesses occurred due to the inadequate strategic direction, planning, management and monitoring of livelihoods programmes. Despite livelihoods being a strategic priority and considering the challenges faced in the implementation of the programme, risks in this area were not prioritized in the risk register for mitigation. Consequently, the limited opportunities for PoCs to become self-reliant were unsuccessful and this left PoCs vulnerable and dependent on humanitarian assistance.

**(5) The UNHCR Representation in Nigeria should: (a) evaluate its livelihoods programme and use the results to inform the formulation of a livelihoods strategy; (b) review its standard operating procedures to strengthen controls over livelihood programmes including identifying beneficiaries and conducting feasibility studies for interventions; (c) reinforce its monitoring of programmes against performance indicators; and (d) ensure beneficiaries have access to necessary technical expertise.**

*UNHCR accepted recommendation 5 and stated since the audit field work, the operation has started using the Livelihoods Information Systems (LIS) and had made it mandatory for implementing partners to record outputs and outcomes through this system.*

## **E. Security from gender-based violence**

### Need to address gaps in the gender-based violence response

40. GBV was a major protection concern facing IDP and refugee women and girls in Nigeria and the Representation provided services to survivors through implementing partners. The Representation is required to have a strategy and SOPs that guide GBV prevention and ensure an effective response, coordinate with other clusters and key stakeholders and monitor grave violations of human rights.

41. The Representation was responsible for providing GBV services to refugees where no other agency was present, and a United Nations agency led the related IDP response in the north-east. The Representation spent \$3.5 million on GBV related activities in the period under review, and this according to the 2021 operations plan represented a 76 per cent funding gap. This affected the Representation's establishment of an effective response mechanism covering health, legal and psychosocial services to survivors. For instance, available GBV data showed that 78 per cent of households with GBV survivors lacked access to psychosocial support services, particularly if they did not speak Hausa or Kanuri. The partner was also unable to provide survivors with sanitary materials and core relief items. These gaps called for the

Representation's continued advocacy with the Humanitarian Country Team to assist in the delivery of GBV prevention and response services as per the Interagency Standing Committee guidelines.

42. The Representation provided a comparative overview of reported GBV incidents between 2019 and 2021, with 5,425 and 1,172 GBV cases among IDPs and refugees respectively. The IDP data was incomplete, i.e., it was only available up to May 2021 and only comprised what was available with the Cluster Lead. In the absence of a central GBV information system, the audit could not validate the reported numbers. Data on key GBV indicators was available for 2020, but this was not the case for 2021. Furthermore, the Representation had not done the 2021 annual reporting for the policy monitoring framework covering key actions for prevention and response envisaged in the 2020 GBV policy.

43. Considering there is a widely acknowledged underreporting of GBV cases due to fear of stigmatization and retaliation among other issues, the actual numbers were likely to be much higher. However, the period under review also coincided with the movement restrictions imposed generally in the country which had a negative impact on access to affected population.

44. OIOS reviewed 12 GBV case management files from implementing partners, six from the north-east (IDPs) and six from refugee operations in the south-east. The six refugee case files contained all necessary information about the incidents, actions to be taken, follow up action sheets and closure forms. However, the IDP case files lacked the required details on incidents, action taken, and case follow up and closure. For instance, in an incident involving a child in October 2021, the first interview only happened on 9 November 2021. Furthermore, the partner did not follow the required protocols for the clinical management of rape. Also, the files related to forced child marriages did not refer to the psychological problems survivors may have had.

45. During the reporting period, the Representation had conducted safety audits in some but not all areas that hosted refugees. The mandatory GBV safety audits were not conducted in the north-east. Where conducted, safety audits did not consistently implement actions to address identified issues.

46. The Representation did not have an up-to date country specific GBV strategy that set clear goals and priorities, thereby negatively impacting the predictability and consistency as well as effective delivery of GBV prevention and response programmes. The last strategy and SOPs were for the period 2013-2017 and thus did not align with the latest UNHCR policy issued in 2020. This and gaps in the Representation's monitoring of the implementing partner impacted their delivery of services to GBV survivors.

**(6) The UNHCR Representation in Nigeria should update its gender-based violence strategy and standard operating procedures to drive prevention and response and complete its 2021 annual GBV report in accordance with the policy monitoring framework. This should cover the collection of accurate GBV data, conducting safety audits and monitoring the management of identified cases by partners.**

*UNHCR accepted recommendation 6 and stated that the operation will work towards ensuring compliance with Global GBV Policy and actions have been initiated to update the National GBV Strategy and monitoring framework.*

## **F. Procurement and contract management (including procurement designated to partners)**

47. To ensure that best value is received on procurement, the Representation needed to plan, procure and manage contracts in accordance with UNHCR guidelines.

### **Procurement by the Representation**

#### Need to strengthen monitoring of procurement activities

48. In the two-year period 2020/2021, the Representation procured goods and services totaling \$15.9 million, including \$2.2 million through the Headquarters Supply Management Service. The Representation did not have an annual consolidated procurement plan resulting in ad hoc purchases and frequent requests for waivers of competitive bidding as reflected below. Without annual consolidated procurement plans in place, the Representation also did not have a basis against which to monitor its procurements. For instance, the Representation could not apply for an Import Duty Exemption Certificate (for which an annual consolidated procurement plan was a requirement) and this was one of the causes of the incurrence of demurrage and storage costs of \$84,000 in the period under audit.

49. The audit identified gaps in the Representation's control framework including; (i) 10 cases of ex-post facto submissions totaling \$3.1 million that represented unauthorized purchases; (ii) 11 procurements totaling \$596,255 that were conducted without competitive bidding and approval of the local committee on contracts while exceeding the threshold of \$40,000; (iii) submission of COVID-19 purchases totaling \$305,000 to local instead of the regional committee on contracts for approval; (iv) 5 purchases which went through competitive bidding but did not obtain the necessary local or regional committee on contracts approval; and (v) three cases of contract extension beyond the contract expiration date totaling \$42,126.

50. In its review of 33 local contracts totaling \$3.3 million, the audit also identified the following gaps:

- In nine cases, the Representation did not have lists reflecting when bids were received. In two other cases (solar inverters and motorcycles totaling \$72,901), late bids from five vendors were evaluated.
- Three procurements totaling \$76,007 were not supported with technical evaluation reports.
- In some cases, the Representation's submissions to the committees on contracts did not contain adequate information to support their decision making. For example, the rental of guesthouse 2 in Ogoja did not contain comparisons to support the reasonableness of proposed rent (\$40,881).
- The Representation purchased the same items at significantly different prices and could have made a saving of \$30,300. The unit price paid for 35 and 24 motor-cycles in Ogoja, and Abuja were \$900 and \$1,600 respectively. These 59 motorcycles remained unused at the time of the audit (six months after procurement). In another purchase of solar lights, UNHCR could have saved \$5,800.
- The files for all 33 purchase orders were not chronologically arranged and indexed. Six purchases had incomplete documentations, i.e., tender, bid envelopes and bid opening committee minutes.

51. The audit also identified gaps in contract management. Eleven purchases recorded delays in deliveries, ranging between 2 to 175 days (average of 48 days). Three vendors had not delivered the ordered items i.e., medical equipment and 40 laptops totaling \$92,171 and only 3 out of 4 ordered brickmaking machines totaling \$273,962 were delivered. These delays affected the timely implementation of programmatic activities, e.g., the 40 laptops were needed for the PoC verification exercise. Goods received notes did not always reflect the number of items accepted, rejected, and reasons for rejection. Also, there were no vendor performance evaluation reports for 14 procurement actions reviewed.

52. The above weaknesses were due to the decentralization of the procurement authority to sub-offices without the necessary planning, capacity building and monitoring. This resulted in purchases that did not always represent best value for money.

**(7) The UNHCR Representation in Nigeria should strengthen its compliance with UNHCR procurement guidance and ensure best value for money is obtained on purchases by (a) developing procurement plans to support its monitoring of related activities and (b) assessing sub-offices capacity prior to decentralizing procurement.**

*UNHCR accepted recommendation 7 and stated that the operation is working on the procurement plans. It is also noteworthy that in 2021, the operation recruited a competent Supply Officer and reinforced the unit with the recruitment of an Assistant Supply Associate.*

## **Procurement delegation to implementing partners**

### Urgent need to review the delegation of procurement to some partners

53. The Representation delegated procurement aggregating to \$16.2 million to its 21 implementing partners in the two-year period 2020/2021. OIOS reviewed 156 procurement actions at six partners totaling \$4.2 million and identified gaps which had implications for the Representation obtaining best value on purchases. Three of the 6 partners did not have plans and thus the Representation did not have a basis against which procurements could be monitored. In addition, the following gaps were identified in procurement actions at partners:

- Four partners followed the request for quotation method regardless of value of procurements. Other issues noted included: (i) absence of competitive bidding in seven cases totaling \$2.8 million; (ii) waivers of competitive bidding not submitted to the procurement committee as required; (iii) applying shorter bid submission periods than prescribed; and (iv) in one case, the bid opening date was after the contract date.
- Partners did not maintain the list of bids received by date and time. In six cases totaling \$2.8 million, late bids were evaluated. One partner did not implement a two-envelope system to segregate technical bids from financial.
- Three partners lacked documentation evidencing the technical evaluations conducted for 32 cases totaling \$2 million. One partner simultaneously opened technical and financial bids in 8 cases totaling \$168,000 instead of conducting the technical evaluation first.
- In five cases, the lowest bidders were excluded from the comparative bid analysis, resulting in increased costs of \$35,922. Three partners did not compare prices against frame agreements and markets resulting in foregone savings of \$75,000. For instance, the vendor's prices for medicines/medical items exceeded those in the local framework agreement by 36 to 581 per cent and the global by 54 to 1,452 per cent. Moreover, no justification was provided as to why the partner was entrusted with these procurements.
- Three partners did not adequately segregate procurement duties, where same staff were opening, evaluating and approving bids and overseeing the same purchases.
- The supplies procured by three partners totaling \$354,645 were not supported by goods received notes to evidence that they were purchased in full and in accordance with specifications. An order of 70 cholera kits and 30 rota virus kits was changed to 50/50 of each with no evidence of prior approval.
- Three partners did not ensure effective payment mechanisms. For instance, payments totaling \$747,241 were not adequately supported or billing charges lacked details.

- Four partners did not maintain comprehensive recordkeeping for purchases effected.

54. In addition, OIOS identified several red flags indicating procurement fraud at two partners (procurement value of \$2.7 million), i.e., fabrication of documents to create the perception of competitive procurement, bidders quoting the exact unit prices referenced in the project budgets; conducting business with unregistered vendors; and inability to locate the physical address of a vendor. These instances have been referred for investigation.

55. These issues arose due to the Representation not having assessed the modality of procurement (directly by UNHCR or through partnerships) and the procurement capacity of partners due to restrictions occasioned by the COVID-19 pandemic. In 2021, such assessments were done but did not cover all partners. The monitoring of procurement activities was impacted by using only Project Control staff without the involvement of Supply staff, which is contrary to the Multi-Functional Team approach.

**(8) The UNHCR Representation in Nigeria should: (a) assess the comparative advantage and capacity of implementing partners to conduct effective and economical procurement before delegating them procurement authority; (b) involve Supply staff in monitoring of related procurement processes; and (c) reduce procurement delegated to partners where high risks were identified.**

*UNHCR accepted recommendation 8 and stated that for partnerships in 2023 and beyond, the Representation will undertake cost – benefit analyses for high value and risky procurements prior to deciding to either delegate or retain them under direct implementation. Supply staff were involved in all verification exercises for partners with significant procurement budgets. This is expected to be the practice going forward. The Representation has also taken steps to reduce procurement delegated to partners where significant weaknesses have been observed. For example, it implemented a 64 per cent budget reduction in 2022 for one of the partners in the Northeast where irregularities were observed. Further budget reductions are anticipated in 2023, where deemed necessary.*

#### IV. ACKNOWLEDGEMENT

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

(Signed) Anne Ochwo Rwego  
 Chief, UNHCR Audit Service  
 Internal Audit Division  
 Office of Internal Oversight Services

## STATUS OF AUDIT RECOMMENDATIONS

## Audit of operations in Nigeria for the Office of the United Nations High Commissioner for Refugees

Rec. 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	The UNHCR Representation in Nigeria should implement: (a) an advocacy and coordination plan to increase the Government and development agencies' support to implementing the Global Compact on Refugees pledges; and (b) key sector strategies to drive the achievement of its vision.	Important	O	Receipt of documentary evidence of: (a) an advocacy and coordination plan to increase the Government and development agencies' support to implementing the GCR pledges; and (b) key sector strategies developed to drive the achievement of the vision in the multi-year, multi partner strategy.	31 March 2023
2	The UNHCR Representation in Nigeria should implement: (a) an effective performance management system to measure its progress in achieving its strategic objectives; and (b) strengthen its identification and mitigation of risks that impede the achievement of its strategic objectives.	Important	O	Receipt of documentary evidence of: (a) a performance framework that is linked to its strategic objectives and used to measure key programme results; and (b) an updated risk register that reflects key risks that impede the achievement of its strategic objectives as well as mitigating actions.	31 March 2023
3	The UNHCR Representation in Nigeria should: (a) update its public health strategy and procedures which ensure full inclusion of refugees in national systems; (b) prepare a lessons learned document on the implementation of the Refugee Health Insurance Scheme to guide and improve future related programmes; and (c) reconcile payments made by the insurance company and recover any overpayments.	Important	O	Receipt of documentary evidence of: (a) updated public health strategy and procedures encompassing plans for full inclusion in national systems; (b) lessons learned document on the implementation of Refugee Health Insurance Scheme to guide and improve future health programmes; and (c) reconciliation of transfers to and payments made by the vendor and recovery of any overpayments.	31 March 2023
4	The UNHCR Representation in Nigeria should ensure timely, cost-effective and targeted distribution of food assistance by: (a) updating the related strategy based on a comprehensive	Important	O	Receipt of documentary evidence of: (a) updated food assistance targeting strategy based on comprehensive assessment of needs; (b) enhanced controls over identification and	31 July 2023

<sup>1</sup> Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

<sup>2</sup> Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

<sup>3</sup> Please note the value C denotes closed recommendations whereas O refers to open recommendations.

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



## STATUS OF AUDIT RECOMMENDATIONS

## Audit of operations in Nigeria for the Office of the United Nations High Commissioner for Refugees

Rec. 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>
	assessment of needs; (b) enhancing its controls over identification and distribution of cash to beneficiaries; and (c) reviewing its modality for cash distribution to reduce related costs.			distribution of cash to beneficiaries; and (c) review of its modality for distribution to reduce related costs.	
5	The UNHCR Representation in Nigeria should: (a) evaluate its livelihoods programme and use the results to inform the formulation of a livelihoods strategy; (b) review its standard operating procedures to strengthen controls over livelihood programmes including identifying beneficiaries and conducting feasibility studies for interventions; (c) reinforce its monitoring of programmes against performance indicators; and (d) ensure beneficiaries have access to necessary technical expertise.	Important	O	Receipt of documentary evidence of: (a) the results of the evaluation and the use of this information to develop a livelihoods strategy; (b) application of reinforced selection criteria to identify beneficiaries and feasibility studies to inform selection of projects to invest in; (c) extension of technical expertise to beneficiaries in the management of their existing livelihoods projects; and (d) accurate reporting of results against performance indicators.	31 December 2023
6	The UNHCR Representation in Nigeria should update its gender-based violence strategy and standard operating procedures to drive prevention and response and complete its 2021 annual GBV report in accordance with the policy monitoring framework. This should cover the collection of accurate GBV data, conducting safety audits and monitoring the management of identified cases by partners.	Important	O	Receipt of documentary evidence of: (a) completed reporting for 2021 on the GBV monitoring framework; (b) updated GBV strategy and procedures to drive prevention and response, and (c) mechanisms to collect accurate GBV data, conduct safety audits and monitor case management.	30 June 2023
7	The UNHCR Representation in Nigeria should strengthen its compliance with UNHCR procurement guidance and ensure best value for money is obtained on purchases by (a) developing procurement plans to support its monitoring of related activities and (b) assessing sub-offices capacity prior to decentralizing procurement.	Important	O	Receipt of documentary evidence of: (a) the consolidated procurement plan and instituted mechanisms to ensure that purchases are conducted in compliance with UNHCR procurement rules; and (b) results of assessments of sub-offices capacity that support delegation of procurement to sub-offices.	31 March 2023
8	The UNHCR Representation in Nigeria should: (a) assess the comparative advantage and capacity of implementing partners to conduct effective and economical procurement before delegating them	Important	O	Receipt of documentary evidence of: (a) analysis of comparative advantage of partner's capacity to procure, duly supported by cost calculations; and (b) project agreements with reduced budgets	31 March 2023

## STATUS OF AUDIT RECOMMENDATIONS

## Audit of operations in Nigeria for the Office of the United Nations High Commissioner for Refugees

Rec. 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>
	procurement authority; (b) involve Supply staff in monitoring of related procurement processes; and (c) reduce procurement delegated to partners where high risks were identified.			allocated for partners identified as having fraud risks.	

# **APPENDIX I**

## **Management Response**

## Management Response

## Audit of operations in Nigeria for the Office of the United Nations High Commissioner for Refugees

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
1	The UNHCR Representation in Nigeria should implement: (a) an advocacy and coordination plan to increase the Government and development agencies' support to implementing the Global Compact on Refugees pledges; and (b) key sector strategies to drive the achievement of its vision.	Important	Yes	(a) Senior Development Officer (b) Senior Programme Officer / Senior Protection Officer	31 March 2023	<p>The operation has undertaken a number of activities since 2020/2021, including the GCR Roadmap and State-level GCR visits with the Government, which articulate the way forward in Nigeria. An advocacy and coordination plan will be developed, building on the actions already undertaken.</p> <p>The Government of Nigeria has made significant progress in putting in place a commendable approach to allow the inclusion of refugees into national systems, to avoid the creation of parallel systems, and as such is already ahead of the curve on the implementation of the GCR. The Representation is right now focusing on the consolidation and strengthening of this approach in practice, ensuring continued commitment." A joint retreat was held between UNHCR and the GON (NCFRMI) on 24 – 25 March 2022, resulting in an agreed Action Plan for effective delivery of protection</p>

<sup>5</sup> Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

<sup>6</sup> Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>services. Appropriate Outputs have been identified for the GFR 4 pledges by the Nigerian government (Inclusion, Protection, Durable solutions and regional engagement) and Organizational markers have also been selected for tracking UNHCR Nigeria outputs associated with GCR supportive role towards GRF pledges in 2023-2025 MYP.</p> <p>As much as UNHCR Nigeria did not have an MYMP strategy in 2020, a 2022 Interim Multi-Year Plan was developed in 2021 for the 2022 implementation with the introduction of COMPASS, in preparation for the 2023-2025 MYP which brought key stakeholders together to find sustainable protection solutions for PoCs.</p> <p>The Situation analysis and Strategic orientation of the 2023-2025 MYP addresses the key sector strategies in relation to the mission and vision of the Nigeria operation.</p>
2	The UNHCR Representation in Nigeria should implement: (a) an effective performance management system to measure its progress in achieving its strategic objectives; and (b) strengthen its identification and mitigation of risks that impede the achievement of its strategic objectives.	Important	Yes	Senior Program Officer	31 March 2023	<p>The Nigeria operation increased its presence in the field for both NE and SS/SE by opening and upgrading field offices to improve on management performance by closer proximity to the point of delivery of assistance and protection services.</p> <p>Nigeria Operation has developed an M&amp;E Plan for its multiyear strategy.</p>

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>where it defines how, when and with what resources its results will be monitored and evaluated. It reflects priorities as well for creating evidence required to understand how and to what extent its results are achieved in relation to its strategic objectives. This M&amp;E plan will be implemented and followed up to improve the performance monitoring system</p> <p>Risk management integration in the operation processes is in progress, as the operation has engaged with continuous support from the RB technical team in multiple reviews of the Risk Register to ensure effective risks identification and mitigation measures are in place through measurable treatment.</p>
3	The UNHCR Representation in Nigeria should: (a) update its public health strategy and procedures which ensure full inclusion of refugees in national systems; (b) prepare a lesson learned document on the implementation of the Refugee Health Insurance Scheme to guide and improve future related programmes; and (c) reconcile payments made by the insurance company and recover any overpayments.	Important	Yes	Assistant Public Health Officer and Senior Programme Officer	31 March 2023	The Nigeria operation Health intervention strategy is based on the WCARB general strategy with main objectives of mainstreaming PoCs health services into existing government structures. However, the temporary measure to provide Insurance Cover to refugees through a private health service provider suffered major challenges for implementation. The operation has since discontinued the arrangement under the contract with the private Health service provider and has engaged on an interim basis service with Nigeria Red Cross Society (NRC) pending further evaluation.

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						Technical support is being provided by RB to properly close the previous arrangement after all requirements are taken into consideration. The Representation also agrees with the recommendation to prepare a lesson learned document
4	The UNHCR Representation in Nigeria should ensure timely, cost-effective and targeted distribution of food assistance by: (a) updating the related strategy based on a comprehensive assessment of needs; (b) enhancing its controls over identification and distribution of cash to beneficiaries; and (c) reviewing its modality for cash distribution to reduce related costs.	Important	Yes	CBI-Program Officer	(a) June 2023 (b) February 2023 (c) July 2023	<p>The distribution of food assistance depends on availability of funds which directly impact the timeliness of the distribution.</p> <p>(i) The operation has started with the Registration/verification exercise of Cameroonian refugees in September 2022 and is expected to be completed by the beginning of 2023. The verification exercise is accompanied by a socio-economic assessment at household level. Once the population is verified, with the available datasets, the Representation will be able to shift to targeting by June 2023 and assist refugees who live both in settlements and in host communities. The verification will also be used for the comprehensive needs assessment to update the related strategy on CBI. The representation made progress in engaging with WFP in 2022. Currently WFP is jointly conducting needs assessment of refugee food needs which will inform whether WFP multi-year country plan 2023-2027 will include refugees as beneficiaries.</p>

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>(ii) The operation recently shifted to proGres V4 and currently is in the process of finalizing the rollout of the UNHCR’s CBI payment tool CashAssist that synchronizes data from proGres, MSRP and the financial services providers. It is envisaged that payments as of January 2023 will be processed through CashAssist which will enhance the controls over identification and distribution of cash to beneficiaries.</p> <p>(iii) Since June 2022, the Representation has made progress in increasing the number of CBI beneficiaries who have opened bank accounts. As of Q2 2023, it is planned that e-transfer (bank accounts, mobile money) becomes the main delivery mechanism for the majority of the beneficiaries that will reduce the implementation costs. The cash-in-hand will remain for only a small number of households with specific protection and vulnerability needs.</p>
5	The UNHCR Representation in Nigeria should: (a) evaluate its livelihoods programme and use the results to inform the formulation of a livelihoods strategy; (b) review its standard operating procedures to strengthen controls over livelihood programmes including identifying beneficiaries and conducting	Important	Yes	Livelihoods officer	<p>a. Evaluative review planned for Q1 – Q2 2023</p> <p>b. SOPs to be developed on beneficiary identification and</p>	i. The operation, in accordance with the Regional Bureau, suggests to review the wording of the recommendation as follows: “evaluative review” instead of “impact assessment”,. As there is no baseline for the projects under audit it is not possible to do a proper



Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
	feasibility studies for interventions; and (c) reinforce its monitoring of programmes against performance indicators; and (d) ensure beneficiaries have access to necessary technical expertise.				<p>targeting using finalized verification data for Cameroon refugees planned for Q1 2023</p> <p>c. LIS already deployed as of 2021 and integrated into PAs for all LEI partners with rapid market assessments planned– Q4 2023</p> <p>d. Partnership development to support inclusion of POCs into relevant development programmes, plans and policies to ensure improved LEI support – On going</p>	<p>impact assessment retroactively without the data.</p> <p>ii. Accepted</p> <p>iii. Between the implementation of the audited projects and today and with the change of staff in the Country Office, the operation has started using the Livelihoods Information Systems -LIS (the global LEI programming platform launched by HQ) and in 2022 made it mandatory for implementing partners to record outputs and outcomes through this system. This should fulfill the spirit of the audit’s recommendation ii) without creating additional parallel systems on top of the ones already existing at the global level for UNHCR. LIS if used properly is able to adequately “reinforce the operation’s management oversight” and “strengthen its monitoring of programmes and reporting on performance and impact indicators” as the audit recommended.</p>
6	The UNHCR Representation in Nigeria should update its gender-based violence strategy and standard operating procedures to drive prevention and	Important	Yes	Senior Protection Officer	Commenced-and to continue to Q2 2023	The operation will work towards ensuring compliance with Global GBV Policy and actions have been initiated towards update of its

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
	response and complete its 2021 annual GBV report in accordance with the policy monitoring framework. This should cover the collection of accurate GBV data, conducting safety audits and monitoring the management of identified cases by partners.					<p>National GBV Strategy and the policy monitoring framework that was provisionally issued only in September 2021.</p> <p>Operation is scheduled to participate in a regional planning workshop scheduled for November 2022 where technical guidance and clarity will be sought and alignment of key areas will follow to address gaps identified following a baseline assessment undertaken at the end of 2021 to assess the status of implementation of the nine GBV Policy's Core Actions bearing in mind the differentiated coordination mechanisms for the Refugee response and the IDPs.</p>
7	The UNHCR Representation in Nigeria should strengthen its compliance with UNHCR procurement guidance and ensure best value for money is obtained on purchases by (i) developing procurement plans to support its monitoring of related activities; and (ii) assessing sub-offices capacity prior to decentralizing procurement.	Important	Yes	(i) Senior Supply Officer, Senior Programme Officer and Senior Admin Officer (ii) Assistant Representative Operations	31 March 2023	<p>(i) Accepted Operation is working on the procurement plans (the 18 months Consolidated procurement plan and individual plans where needed).</p> <p>(ii) Accepted</p> <p>On recommendation iii, sub-offices submissions above 100,000 USD are reviewed by the Snr Supply Officer and authorized by the Representative before being forwarded to the relevant committee on contracts. No decentralization has been undertaken by the operation per se, although the local tenders are being launched directly from the Sub Office and the</p>

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>Sub Offices use the e-Submission tool directly themselves and leave the reviewing access to the CO and RB where necessary.</p> <p>It is also noteworthy that in 2021, the operation recruited a competent Supply Officer and reinforced the unit with the recruitment of an Assistant Supply Associate.</p>
8	<p>The UNHCR Representation in Nigeria should: (i) assess the comparative advantage and capacity of implementing partners to conduct effective and economical procurement before delegating them procurement authority; (ii) involve supply staff in monitoring of related procurement processes; and (iii) reduce procurement delegated to partners where high risks were identified.</p>	Important	Yes	<p>(i) Senior Supply Officer, Senior Programme Officer and Project Control Officer</p> <p>(ii) Already implemented</p> <p>(iii) Already implemented, budget for MRRR was reduced, further reductions anticipated in 2023.</p>	31 March 2023	<p>For Partnerships in 2023 and beyond, the Representation will undertake cost – benefit analyses for high value and risky procurements prior to deciding to either delegate or retain them under direct implementation.</p> <p>Supply staff were involved in all verification exercises for Partners with significant procurement budgets. This is expected to be the practice going forward. In fact, one of the Sub offices recently conducted capacity building in procurement management to address weaknesses observed during mid-year verifications and this is expected to be replicated in other offices.</p> <p>The Representation has also taken steps to reduce procurement delegated to partners where significant weaknesses have been observed. For example, following 2021 verification findings, it implemented a 64% budget reduction in 2022 for one of the</p>

Rec. no.	Recommendation	Critical <sup>5</sup> / Important <sup>6</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						partners in the Northeast where irregularities were observed. Further budget reductions are anticipated in 2023 were deemed necessary.