



INTERNAL AUDIT DIVISION

REPORT 2014/116

Audit of staff safety and security in the Pakistan Representation for the Office of the United Nations High Commissioner for Refugees

Overall results relating to the effective management of staff safety and security in the Pakistan Representation were initially assessed as partially satisfactory. Management has implemented all recommendations satisfactorily.

FINAL OVERALL RATING: SATISFACTORY

28 November 2014

Assignment No. AR2013/141/06

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AUDIT REPORT

Audit of staff safety and security in the Pakistan Representation 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 staff safety and security in the Pakistan Representation for the Office of the United Nations High Commissioner for Refugees (UNHCR).
2. In accordance with its mandate, OIOS provides assurance and advice on the adequacy and effectiveness of the United Nations internal control system, the primary objectives of which are to ensure (a) efficient and effective operations; (b) accurate financial and operational reporting; (c) safeguarding of assets; and (d) compliance with mandates, regulations and rules.
3. The United Nations Security Management System governed the security arrangements and measures implemented by the UNHCR Pakistan Representation (hereinafter referred to as ‘the Representation’). The Representation worked collaboratively with the United Nations Department of Safety and Security (UNDSS) in Pakistan. The United Nations established Security Management Teams, where the Representation was a member, to assist the United Nations Designated Official on safety and security matters. The Senior Field Safety Adviser (SFSA) of the Representation assisted the Representative on safety and security matters.
4. The Representation consisted of a branch office and field units in Islamabad, a field office in Karachi, and two sub-offices in Quetta and Peshawar. It also maintained two guesthouses in Peshawar and Quetta to accommodate international staff in compliance with the minimum operating residential security standards (MORSS). As at 30 September 2013, Representation staff and dependants totalled 1,165 consisting of 50 international staff, 256 national staff and 859 dependants. The Safety and Security Unit (SSU), headed by the SFSA, comprised of three international and eight national staff, in line with the approved posts following the UNHCR Headquarters evaluation on staffing in 2012. As at 30 September 2013, a total of 245 guards provided security services to the Representation. In 2013, the Representation’s security expenditures totalled \$2.7 million.
5. Comments provided by UNHCR are incorporated in *italics*.

II. OBJECTIVE AND SCOPE

6. The audit was conducted to assess the adequacy and effectiveness of the Pakistan Representation’s governance, risk management and control processes in providing reasonable assurance regarding the **effective management of staff safety and security in the Representation**.
7. The audit of staff safety and security was included in the 2013 OIOS risk-based work plan due to risks related to the safeguarding of Representation personnel, premises and assets.
8. The key control tested for the audit was the security management system. For the purpose of this audit, OIOS defined security management system as controls that provide reasonable assurance that a functional security management system commensurate with the safety and security risks in the Representation was in place.

9. The key control was assessed for the control objectives shown in Table 1.

10. OIOS conducted this audit from November 2013 to March 2014. The audit covered the period from 1 January 2012 to 28 February 2014.

11. OIOS conducted an activity-level risk assessment to identify and assess specific risk exposures, and to confirm the relevance of the selected key control in mitigating associated risks. Through interviews, analytical reviews and tests of controls, OIOS assessed the existence and adequacy of internal controls and conducted necessary tests to determine their effectiveness. OIOS also visited the sub-offices in Peshawar and Quetta and the field office in Karachi to verify the Representation’s compliance with the Minimum Operating Security Standards (MOSS).

III. AUDIT RESULTS

12. The Pakistan Representation governance, risk management and control processes examined were initially assessed as **partially satisfactory**¹ in providing reasonable assurance regarding the **effective management of staff safety and security in the Representation**. OIOS made five recommendations to address the issues identified in the audit.

13. The key control of security management system was assessed as partially satisfactory because action was needed for the Representation to: (i) monitor staff compliance with safety and security training requirements; (ii) monitor Minimum Operating Residential Security Standards (MORSS) compliance by international staff in Islamabad; (iii) monitor staff compliance with security-related instructions on weekly radio checks and travel clearances; and (iv) ensure that the bi-annual surveys on MOSS compliance address all components of the MOSS requirements, including the measures for securing premises.

14. The initial overall rating was based on the assessment of key control presented in Table 1 below. The final overall rating is **satisfactory** as all recommendations have been implemented satisfactorily.

Table 1
Assessment of key control

Business objective	Key control	Control objectives			
		Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules
Effective management of staff safety and security in the Representation	Security management system	Partially satisfactory	Partially satisfactory	Partially satisfactory	Partially satisfactory
FINAL OVERALL RATING: SATISFACTORY					

¹ A rating of “**partially satisfactory**” means that important (but not critical or pervasive) deficiencies exist in governance, risk management or control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Security management system

Action was taken to ensure staff compliance with safety and security training requirements

15. The Representation needed to ensure that staff completed the required safety and security training mandated under the United Nations Security Management System. This included training on: Basic Security in the Field (BSITF); Advanced Security in the Field (ASITF); and Safe and Secure Approaches in Field Environments (SSAFE). UNDSS in Pakistan required staff to complete the training upon joining the Representation and renew the validity every three years thereafter.

16. OIOS noted that the Representation had not ensured that staff completed the mandatory training or had renewed the validity of the training in the cases where this had expired, for example:

- Of the 121 staff in Islamabad branch and field units, 13 had no BSITF, 7 had no ASITF, and 45 had no SSAFE training. A total of 4 and 19 staff had expired ASITF and SSAFE training respectively.
- Of the 68 staff in sub-office Quetta, 40 had expired SSAFE training.
- Of the 14 staff in field office Karachi, 2 had no SSAFE training, 5 had expired SSAFE training.

17. The Representation issued a memorandum, dated 24 February 2014, to staff reminding them of their obligation to complete the BSITF, ASITF, and SSAFE training. The memorandum mentioned the three year validity of the training, requested staff to submit training certificates to SSU and advised staff that failure to do so might result in disciplinary proceedings. However, the issuance of the memorandum did not result in a substantial improvement in compliance. This occurred due to the lack of response by staff members to the SSU request to submit the training certificates and inadequate monitoring and enforcement of security related requirement. As staff had not fully complied with the training requirements, this exposed them to safety and security hazards.

(1) The UNHCR Representation in Pakistan should: (a) regularly monitor compliance by staff with the mandatory safety and security training requirements; and (b) ensure that training records are updated with the submission of training certificates.

The Representation accepted recommendation 1 and stated that procedures to monitor staff compliance with the mandatory safety and security training requirements were in place and performed on a monthly basis by the SSU. Staff members that needed to complete the training or renew the validity of the training were reminded of the requirement. Upon completion of the training by staff, the staff certificates were registered and filed at the respective field offices in Pakistan. Based on the action taken, and the documentary evidence provided in this regard, recommendation 1 has been closed.

Action was taken to comply with the Minimum Operating Residential Security Standards

18. The MORSS requirements applied only to international UNHCR staff based in Islamabad. As at 11 February 2014, 23 of the 24 international staff in Islamabad had not fully complied with the MORSS requirements despite reminders from the SSU. During its site visit to three of the 24 residences, OIOS confirmed that the residences visited were not MORSS compliant.

19. The shortcomings were caused by lack of required attention by staff to MORSS requirements and the lack of periodic monitoring by the SSU supervisor of the work of the security staff who did the assessment. Non-compliance with MORSS requirements exposed staff to risk of insecurity. When OIOS raised the issue during the audit fieldwork, the Representation issued memorandum to all international staff members based in Islamabad drawing their attention to the latest version of MORSS and the actions that would be taken by the SSU.

(2) The UNHCR Representation in Pakistan should implement time-bound measures to ensure compliance by the international staff in Islamabad with the Minimum Operating Residential Security Standards.

The Representation accepted recommendation 2 and stated that it had reminded all international staff living in a private residence of their obligations regarding MORSS. The SSU, in cooperation with the Supply and Administrative Section, ensured installation of mandatory items, the cost of which was covered by the Representation. All points noted by OIOS during the audit had been rectified and all international staff residences in Islamabad had been re-inspected to be fully MORSS compliant. To improve compliance, items (extinguisher, fire alarm and first aid kit) to be financed by the individual staff members were procured by the Representation on their behalf. Based on the action taken, and the documentary evidence provided in this regard, recommendation 2 has been closed.

Action was taken to ensure staff compliance with the weekly radio check requirements

20. The MOSS required that staff members issued with Very High Frequency (VHF) radios conduct radio checks with the UNDSS radio room every Wednesday. The Representation was required to monitor compliance with this important security protocol.

21. A review of UNDSS radio check records showed that the average radio check compliance was 86 per cent in Islamabad during 2013 and 39 per cent in Quetta from July to December 2013. Sub-office Peshawar and field office Karachi still had to submit the radio check data and compliance rates.

22. The above shortcomings were due to inadequate monitoring by the Representation and because of the lack of required attention by staff to the mandatory requirement. As a result, the safety and security of staff was put at risk.

(3) The UNHCR Representation in Pakistan should periodically monitor compliance by staff with the weekly radio check requirements and take appropriate corrective actions in cases of persistent non-compliance.

The Representation accepted recommendation 3 and commented that the SSU had maintained full statistics of compliance with radio checks at all locations. Information sessions, training and informal reminders to staff had been taken to positively motivate staff to comply with the weekly security requirement. Sub Office Quetta had a much improved compliance rate since corrective action was taken by the Field Safety Adviser and the Head of Sub Office. There had not been a single persistent non-compliance case since May 2014 and subsequently no corrective action was required. Based on the action taken, and the documentary evidence provided in this regard, recommendation 3 has been closed.

Action was taken to ensure compliance with the security clearance requirements for staff travel

23. The United Nations Security Management System required the Representation to monitor compliance by staff members with the requirement of obtaining security clearance from UNDSS prior to travelling.

24. OIOS noted that not all staff undertaking official travel within and outside of Pakistan obtained security clearance from UNDSS before they travelled. In Islamabad and Quetta, OIOS reviewed 103 out of 2,143 travels undertaken between 2012 and 2013 and noted that two staff members had travelled without security clearances, and 18 staff members had yet to show proof that UNDSS granted security clearance before the travel.

25. This occurred due to the lack of attention by the staff to the requirement for clearance and inadequate monitoring by the Representation. As a consequence, the safety and security of staff was endangered.

26. The Representation issued a memorandum on 24 February 2014 to all its staff reminding them of their obligation of full and complete compliance with security-related instructions and noting that failure to do so could result in disciplinary proceedings.

(4) The UNHCR Representation in Pakistan should monitor compliance by staff with the requirement for obtaining prior security clearance for travel and take appropriate corrective actions in cases of persistent non-compliance.

The Representation accepted recommendation 4 and stated that it took corrective measures to ensure compliance with the recommendation. Based on a three-month sample (June, July, and August 2014) of 10 per cent of official travels, the SSU verified the data in the UNDSS security clearance system and travel data from the Administrative Unit. All staff in the sample had applied for and obtained the required security clearance. As at 1 October 2014, the Representation inserted a clause to the UNHCR travel authorization request indicating the responsibility of the staff to obtain security clearance prior to travel and the related consequences of non-compliance. Based on the action taken, and the documentary evidence provided in this regard, recommendation 4 has been closed.

Action was taken to address identified deficiencies and ensure comprehensive conduct of bi-annual Minimum Operating Security Standards surveys

27. In accordance with the United Nations Security Management System, the primary responsibility for implementing MOSS rested with the Representation. The role of UNDSS was to provide oversight over compliance with MOSS requirements. During the period under review, UNDSS had not visited the Representation or its offices in Peshawar, Quetta and Karachi in this regard. However, as per an internal procedure promulgated by the UNHCR Division of Emergency, Security and Supply, the Representation needed to conduct a bi-annual MOSS compliance survey.

28. For the period from 1 January 2012 to 31 December 2013, the Representation conducted four bi-annual MOSS compliance surveys covering the MOSS components related to telecommunications, documentation, coordination mechanisms, medical, equipment, vehicles, training, residential security measures, and premises. However, OIOS noted the following instances of non-compliance with the MOSS requirements, particularly on the component of maintaining secured premises:

- In the Peshawar office, there was need to: control the issuance of identification documents for refugees and visitors; provide VHF radios for visiting staff; install a razor wire in the Protection Unit building; repair the archway metal detector and metal detector devices; install shatter resistant films in soft-skin vehicles; and check the required contents in the vehicles like fire extinguishers, first aid kits, and tools.
- In the Quetta office, there was a need to: make VHF radios available for visiting staff; provide ballistic vests and helmets for staff holding office at the third floor; and provide road maps and ballistic vests and helmets in vehicles.
- In the Karachi office, there was a need to: reinforce the vehicle gate; conduct fire and evacuation drills; maintain logbooks of security briefings; and ensure the functioning of the Thuraya phone in the safe room.

29. The above weaknesses were caused by inadequate monitoring by the Representation of full compliance with the MOSS requirements, which continued to expose the UNHCR staff in Pakistan to safety and security hazards.

(5) The UNHCR Representation in Pakistan should develop and implement an action plan to address the remaining identified deficiencies in the safety and security related controls and ensure timely and comprehensive coverage of all the components in the bi-annual Minimum Operating Security Standards survey.

The Representation accepted recommendation 5 and commented that the deficiencies raised in the audit were addressed. A bi-annual MOSS compliance assessment was carried out in all locations in Pakistan in September 2014. The internal bi-annual MOSS compliance assessments would continue to be carried out as per guidelines and dates internally set by the SSU, in cooperation with UNDSS. Any deficiencies identified during the assessments would be addressed with the assistance of Senior Management. Based on the action taken, and the documentary evidence provided in this regard, recommendation 5 has been closed.

IV. ACKNOWLEDGEMENT

30. OIOS wishes to express its appreciation to the Management and staff of the UNHCR Representation in Pakistan for the assistance and cooperation extended to the auditors during this assignment.

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

STATUS OF AUDIT RECOMMENDATIONS

Audit of staff safety and security in the Pakistan Representation for the Office of the United Nations High Commissioner for Refugees

Recom. no.	Recommendation	Critical ² / Important ³	C/ O ⁴	Actions needed to close recommendation	Implementation date ⁵
1	The UNHCR Representation in Pakistan should: (a) regularly monitor compliance by staff with the mandatory safety and security training requirements; and (b) ensure that training records are updated with the submission of training certificates.	Important	C	Action completed	Implemented
2	The UNHCR Representation in Pakistan should implement time-bound measures to ensure compliance by the international staff in Islamabad with the Minimum Operating Residential Security Standards.	Important	C	Action completed	Implemented
3	The UNHCR Representation in Pakistan should periodically monitor compliance by staff with the weekly radio check requirements and take appropriate corrective actions in cases of persistent non-compliance.	Important	C	Action completed	Implemented
4	The UNHCR Representation in Pakistan should monitor compliance by staff with the requirement for obtaining prior security clearance for travel and take appropriate corrective actions in cases of persistent non-compliance.	Important	C	Action completed	Implemented
5	The UNHCR Representation in Pakistan should develop and implement an action plan to address the remaining identified deficiencies in the safety and security related controls and ensure timely and comprehensive coverage of all the components in the bi-annual Minimum Operating Security	Important	C	Action completed	Implemented

² Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

³ Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

⁴ C = closed, O = open

⁵ Date provided by UNHCR Pakistan in response to recommendations.

STATUS OF AUDIT RECOMMENDATIONS

Audit of staff safety and security in the Pakistan Representation for the Office of the United Nations High Commissioner for Refugees

Recom. no.	Recommendation	Critical ² / Important ³	C/ O ⁴	Actions needed to close recommendation	Implementation date ⁵
	Standards survey.				

APPENDIX I

Management Response

Management Response

**Audit of staff safety and security in the Pakistan Representation for the Office of the United Nations High Commissioner
for Refugees**

Rec. no.	Recommendation	Critical ⁶ / Important ⁷	Accepted? (Yes/No)	Title of responsible individual	Implementation Date	Client comments
1	The UNHCR Representation in Pakistan should: (a) regularly monitor compliance by staff with the mandatory safety and security training requirements; and (b) ensure that training records are updated with the submission of training certificates.	Important	Yes	Senior Field Safety Advisor / Field Safety Associate (UNHCR ROI)	Completed	<p>Procedures to monitor staff compliance with the mandatory safety and security training requirements are in place and performed on a monthly basis by the Safety and Security Unit (SSU).</p> <p>Staffs that need to complete the training or renew the validity of the training are reminded of the requirement. Upon completion of the training, the staff certificates are registered and filed at the respective filed offices in Pakistan.</p>
2	The UNHCR Representation in Pakistan should implement time-bound measures to ensure compliance by the international staff in Islamabad with the Minimum Operating Residential Security Standards.	Important	Yes	Senior Field Safety Advisor / Field Safety Associate (UNHCR ROI)	Completed	<p>The UNHCR Representation in Pakistan provides all staff opting to live in a private residence with a MORSS assessment, clearly detailing their obligations in this regard.</p> <p>The SSU in cooperation with Supply and Admin. Sections ensure installation of mandatory items, the cost of which is covered by the organization.</p> <p>All points noted by the Auditor during his assessment have been</p>

⁶ Critical recommendations address significant and/or pervasive deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance cannot be provided regarding the achievement of control and/or business objectives under review.

⁷ Important recommendations address important deficiencies or weaknesses in governance, risk management or internal control processes, such that reasonable assurance may be at risk regarding the achievement of control and/or business objectives under review.

Management Response

**Audit of staff safety and security in the Pakistan Representation for the Office of the United Nations High Commissioner
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Rec. no.	Recommendation	Critical ⁶ / Important ⁷	Accepted? (Yes/No)	Title of responsible individual	Implementation Date	Client comments
						<p>rectified and all international staff residences in Islamabad have been re-inspected to be fully MORSS-compliant.</p> <p>In order to improve compliance, items which are to be financed by the individual staff member (extinguisher, fire alarm and first aid kit) are now procured by the Representation on their behalf.</p> <p>In order to avoid any potential future cases of non-compliance, as of September 2014, the SSU will follow up the initial assessment of any Islamabad international staff member's new accommodation as soon as the staff member informs that MORSS compliance has been implemented but no later than within 60 days of the first assessment. Any pending points will be noted and subsequent enhancements to be executed within a reasonable timeframe.</p>
3	The UNHCR Representation in Pakistan should periodically monitor compliance by staff with the weekly radio check requirements and take appropriate corrective actions in cases of persistent non-compliance.	Important	Yes	Senior Field Safety Advisor / Field Safety Associate (UNHCR ROI)	Completed	<p>SSU is maintaining full statistics of compliance with radio checks at all locations.</p> <p>A number of steps have been taken to positively motivate staff to comply with the weekly security requirement.</p>

Management Response

**Audit of staff safety and security in the Pakistan Representation for the Office of the United Nations High Commissioner
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Rec. no.	Recommendation	Critical ⁶ / Important ⁷	Accepted? (Yes/No)	Title of responsible individual	Implementation Date	Client comments
						<p>These include information sessions, training and informal reminders to staff.</p> <p>It is to be noted that Quetta has a much improved compliance rate since corrective action was taken by the Field Safety Adviser, on duty since July 2014, with the support of the Head of Sub-Office.</p> <p>There has not been a single persistent non-compliance case since May 2014 and subsequently no corrective action was required.</p>
4	The UNHCR Representation in Pakistan should monitor compliance by staff with the requirement for obtaining prior security clearance for travel and take appropriate corrective actions in cases of persistent non-compliance.	Important	Yes	Senior Field Safety Advisor / Field Safety Associate (UNHCR ROI)	Completed	<p>The obligation to obtain security clearance for official travel remains primarily the responsibility of each individual staff member. Upon recruitment or arrival, UNHCR Pakistan staff is briefed on the obligation of obtaining security clearance from UNDSS before they travel. SSU support is available to staff who may encounter complications with requesting TRIP-clearance.</p> <p>In order to ensure compliance with the recommendation, the following measures were taken by the Representation.</p> <p>1. A 3 month sample (June, July, and</p>

Management Response

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Rec. no.	Recommendation	Critical ⁶ / Important ⁷	Accepted? (Yes/No)	Title of responsible individual	Implementation Date	Client comments
						<p>August 2014) of 10 % of official travel was cross-verified by the SSU between data available in the TRIP system and travel data received from the Admin-section. All persons audited in this sample verification had applied for and obtained required security clearances and no case of non-compliance with security clearance requirements was to be reported.</p> <p>2. As of 01 October 2014, the following clause has been inserted to the internal travel authorization request in use: "By signing, the requesting staff member understands and accepts responsibility for ensuring that a UNDSS travel security clearance is requested and obtained prior to undertaking the travel. This travel authorization and PT8 (if applicable) is null and void without security clearance. Travel without security clearance is unauthorized and may result in administrative and disciplinary consequences. Travel clearance is obtained through TRIP (dss.un.org), Safety and Security Unit Colleagues can assist as required in case of need."</p>
5	The UNHCR Representation in Pakistan	Important	Yes	Senior Field	Completed	Deficiencies pointed out by the

Management Response

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Rec. no.	Recommendation	Critical ⁶ / Important ⁷	Accepted? (Yes/No)	Title of responsible individual	Implementation Date	Client comments
	should develop and implement an action plan to address the remaining identified deficiencies in the safety and security related controls and ensure timely and comprehensive coverage of all the components in the bi-annual Minimum Operating Security Standards survey			Safety Advisor / Field Safety Associate (UNHCR ROI)		auditors were addressed. A bi-annual MOSS compliance assessment was carried out in all locations in Pakistan in September 2014. The internal bi-annual MOSS compliance assessment will continue to be carried out as per guidelines and dates internally set by FSS and in cooperation with UNDSS. Any deficiencies identified during the assessments will be addressed with the assistance of Senior Management.