



INTERNAL AUDIT DIVISION

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

The Representation needed to strengthen controls over protection activities, emergency preparedness, projects implemented through partners, provision of basic services and durable solutions to persons of concern, financial tracking and reporting, procurement and vendor management, and human resources management

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

EXECUTIVE SUMMARY

The objective of the audit was to assess the adequacy and effectiveness of governance, risk management and control processes over the Office of the United Nations High Commissioner for Refugees (UNHCR) operations in Greece. The audit covered the period from 1 June 2015 to 30 September 2016 and included a review of: planning and resource allocation; emergency preparedness; partnership management; provision of basic needs and services and durable solutions; financial tracking and reporting; procurement and vendor management; and human resources management.

OIOS concluded that there was a need for the UNHCR Representation in Greece to address gaps in its control arrangements over: protection activities; emergency preparedness and provision of emergency non-food items (NFIs) to persons of concern; project activities implemented through partners; provision of shelter, water, sanitation and hygiene (WASH), and site management support services; monitoring of activities associated with the relocation scheme and risks related to return of persons of concern who were not able to submit an asylum claim on their arrival; financial tracking and reporting; procurement and vendor management; and human resources management.

OIOS made nine recommendations. To address issues identified in the audit, the Representation needed to:

- Undertake a participatory needs assessment at all sites, prepare a multi-year protection strategy, establish appropriate standard operating procedures (SOPs), case management tools and referral pathways for core protection activities, and ensure the work plan developed for unaccompanied minor children is implemented as planned.
- Undertake regular assessments of emergency preparedness, revise the existing contingency plan, develop a business continuity plan, and maintain minimum contingency stocks of NFIs and systematically monitor and reconcile their distribution to beneficiaries.
- Strengthen assessment of partners' capacity to undertake procurement on UNHCR's behalf, coordinate project monitoring activities between the Country Office and offices in the field, and monitor project activities through a risk-based and multi-functional approach.
- Prepare a shelter strategy and develop SOPs for its implementation, ensure that shelter and WASH solutions are provided in accordance with Sphere standards, and finalize the site management support strategy and ensure that all sites have the required fire safety plan.
- Develop a strategy for minimizing the vacancy rate in accommodations rented.
- Establish a formal system for monitoring the risks of return of persons of concern who were not able to lodge an asylum claim on their arrival in Greece after 20 March 2016.
- Strengthen supervisory reviews over the delegation of authority plan, voucher preparation, management of accounts receivable, and petty cash management.
- Prepare a procurement plan, review the vendor database and ensure existence of complete vendor files, and train the members of the Local Committee on Contracts.
- Realign the staffing structure based on a situational analysis, develop a strategy for deploying affiliate workforce, notify new staff of their employment conditions, clarify the reporting lines of seconded staff, and ensure that all staff complete the mandatory training courses.

UNHCR accepted the recommendations, has implemented one of them and has initiated appropriate action to implement the remaining eight.

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Audit of the operations in Greece 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 Greece for the Office of the United Nations High Commissioner for Refugees (UNHCR).

2. The UNHCR Representation in Greece (hereinafter referred to as ‘the Representation’) was established in March 1952 and became a national office under the UNHCR Regional Representation for Southern Europe in Italy in 2007. Due to an unprecedented emergency situation in 2015, as the number of persons of concern entering Greece by the Mediterranean Sea significantly increased, reaching 50,000 a month, UNHCR declared a level-2 emergency in the country on 30 June 2015 and initiated structural changes to deal with the emergency. As a result, from September 2015, the Representation started reporting directly to the Bureau for Europe at UNHCR headquarters. On 1 January 2016, it became a stand-alone country operation. However, the Representation did not have a host country agreement for providing humanitarian support in Greece.

3. As of September 2016, the Representation was assisting 59,694 persons of concern. The key strategic priorities of the Representation for 2015 and 2016 were: (i) assisting the Government of Greece and the civil society in responding to the most urgent humanitarian and protection needs of persons of concern arriving from Turkey; (ii) supporting the Government in establishing reception facilities for persons in need of international protection and registering, receiving and processing asylum requests; and (iii) supporting the Government in implementing the plan established by the European Commission to relocate approximately 66,400 asylum seekers from Greece to different European Union member states and Norway and Switzerland by September 2017.

4. On 18 March 2016, the European Union and Turkey issued a joint statement, according to which “*all new irregular migrants crossing from Turkey into Greek islands as from 20 March 2016 will be returned to Turkey*”, while “*for every Syrian being returned to Turkey from Greek islands, another Syrian will be resettled from Turkey to the European Union*”. In exchange, the European Union member states agreed to increase the resettlement quota of Syrian refugees residing in Turkey. Those persons of concern who arrived prior to 20 March 2016 were in principle entitled to registration and asylum procedures, family reunification where appropriate, and the possibility to be relocated to other member states of the European Union. UNHCR was not a party to this statement.

5. The Representation is headed by a Representative at the D-1 level. It has a Country Office in Athens, two Sub-Offices (in Thessaloniki and Lesbos), four Field Offices (in Attica, Chios, Kos and Samos) and five Field Units (in Leros, Larisa, Ioannina, Rhodes and Orestiada). As of September 2016, the Representation had a total workforce of 585, including 46 affiliate staff. The Representation had expenditure of \$16.1 million between 1 June and 31 December 2015 and \$112.2 million between 1 January and 30 September 2016. It worked with 13 partners in 2015 and 26 in 2016. The total operations expenditure of these partners during the period under review accounted for 61 per cent of the Representation’s programme related expenditure.

6. The Representation faced challenges in transforming itself from a national office to an emergency operation. Therefore, a number of oversight missions were undertaken by UNHCR headquarters during the emergency, with recommendations raised to improve relevant processes and procedures.

7. Comments provided by the Representation are incorporated in italics.

II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

8. The objective of the audit was to assess the adequacy and effectiveness of governance, risk management and control processes over UNHCR operations in Greece.

9. The audit was added to the 2016 risk-based internal audit work plan of OIOS as a new assignment as the UNHCR operations in Greece were growing in size and importance during 2016 due to the sharp increase in the number of persons of concern arriving by the Mediterranean Sea.

10. The audit was conducted from August to November 2016. The audit covered the period from 1 June 2015 to 30 September 2016. Based on an activity-level risk assessment, the audit covered higher risk processes and activities pertaining to the operations in Greece, which included: planning and resource allocation; emergency preparedness; partnership management; provision of basic needs and services; provision of durable solutions; financial tracking and reporting; procurement and vendor management; and human resources management.

11. The audit methodology included: (a) interviews of key personnel; (b) review of relevant documentation; (c) analytical reviews of data, including financial data from Managing for Systems, Resources and People (MSRP), the UNHCR enterprise resource planning system, and performance data from FOCUS, the UNHCR results-based management system; (d) testing of controls using stratified random sampling; (e) visits to the Representation's Country Office in Athens, Sub-Offices in Thessaloniki and Lesbos, and the offices of four partners implementing UNHCR projects; and (f) direct observation of activities and projects implemented at four refugee sites, three warehouses, two accommodation facilities in Athens, and two reception facilities in Lesbos.

III. OVERALL CONCLUSION

12. OIOS concluded that improvements had been made to the Representation's internal control system since the peak of the emergency, but there remained a need for the Representation to address control gaps in the following areas: protection activities; emergency preparedness and provision of emergency non-food items (NFIs) to persons of concern; project activities implemented through partners; provision of shelter, water, sanitation and hygiene (WASH), and site management support services; monitoring of activities associated with the relocation scheme and risks related to return of persons of concern who were not able to submit an asylum claim on their arrival; financial tracking and reporting; procurement and vendor management; and human resources management.

IV. AUDIT RESULTS

A. Planning and resource allocation

The Representation needed to enhance control arrangements over its core protection activities

13. The UNHCR Programme Manual requires the Representation, based on a comprehensive needs assessment done through a participatory age, gender and diversity mainstreaming exercise, to prepare an annual operations plan that identifies objectives for different population planning groups. The Representation is required to align the operations plan with UNHCR's Global Strategic Priorities, allocate adequate resources for achievement of the objectives, and include baselines and targets for identified

priorities as well as indicators for measuring performance. The Representation should also prepare a multi-year protection strategy, and develop SOPs and protection monitoring tools for each priority area.

14. During the period under review, the Representation maintained data on its persons of concern; prepared an operations plan in 2016 in alignment with the Global Strategic Priorities; prioritised resources for the achievement of the identified objectives; prepared a protection strategy; developed a number of protection monitoring tools; and assisted the Government in the review and registration of arrivals on the islands after 20 March 2016 and the pre-registration of about 28,000 asylum seekers in the mainland between May and August 2016.

15. However, OIOS observed the following issues for further strengthening:

- (a) **Participatory needs assessment:** The Representation undertook a profiling exercise for Syrians and Afghans upon their arrival. However, it did not conduct a participatory needs assessment for programme planning purposes in five of the nine transit locations. This included 22 sites under Sub-Office Thessaloniki accommodating about 14,000 refugees and corresponding to half of the total number of sites and persons of concern in the mainland.
- (b) **Protection strategy:** The Representation's protection strategy was not multi-year in its approach, and did not contain a vision of what the operation expected to achieve in the coming years, including related targets.
- (c) **Standard operating procedures:** The Representation did not initiate the preparation of SOPs for monitoring of detention centres for unaccompanied minor children. It also did not finalise and put into practice draft SOPs for: the complaints monitoring mechanism; monitoring of returns; information on legal rights and obligations at entry points; and best interest assessment/best interest determination.
- (d) **Case management and referral pathways:** Case management involves planning, implementation, monitoring and evaluation of protection interventions to persons of concern while referral pathways are the forms of protection interventions available. The Representation did not: (i) develop case management tools and referral pathways, integrated and mainstreamed with the official government procedures; (ii) establish referral pathways for sexual and gender-based violence cases and unaccompanied minor children at all sites; and (iii) streamline its referral mechanisms with another humanitarian organisation involved in referral activities.
- (e) **Child protection:** Although the Representation prepared a work plan to support the Government in ensuring comprehensive child protection of unaccompanied minor children through their best interest assessment, it did not fully execute the plan. The Representation also did not develop a protection monitoring tool for the reception accommodation for the unaccompanied minor children on the mainland, and did not arrange for pre-registration of 15 unaccompanied minor children living at a site in northern Greece, although six of them had arrived in Greece before the pre-registration exercise was undertaken.

16. The Representation explained that the main reason for the cited weaknesses was that prior to the emergency it was only playing an advocacy role in Greece. In the post-emergency scenario there were several rapid changes in the emergency response, and the Representation's role vis-a-vis the Government of Greece was not adequately clarified. While noting the Representation's explanation, OIOS identified that the Representation had recognised a number of protection activities as high risk in its risk register completed in April 2016, but had not implemented mitigating measures to address them. As a result of

the above, the Representation continued to be exposed to the risk of non-achievement of its protection mandate.

- (1) The UNHCR Representation in Greece, in coordination with the Government of Greece and the Bureau for Europe, should enhance controls over its core protection activities by: (i) undertaking a participatory needs assessment at all sites; (ii) preparing a multi-year protection strategy; (iii) establishing appropriate standard operating procedures, case management tools and referral pathways; and (iv) ensuring the work plan developed for unaccompanied minor children is implemented as planned.**

UNHCR accepted recommendation 1 and stated that the Representation had completed the participatory needs assessment, prepared a multi-year protection strategy, initiated action for consolidating SOPs, case management tools and information on referral pathways, and established a work plan for interventions related to unaccompanied minors. Recommendation 1 remains open pending receipt of a copy of the finalized multi-year protection strategy, SOPs, case management tools and information on referral pathways, as well as the report on the implementation of the work plan for interventions related to unaccompanied minors.

B. Emergency preparedness

The Representation needed to strengthen controls over emergency preparedness and provision of emergency NFIs to persons of concern

17. The UNHCR Emergency Handbook and other procedures and guidelines for emergency preparedness call for the Representation, in coordination with inter-agency working groups and the local government, to: (i) develop a contingency plan as a part of its emergency preparedness and response actions taking into consideration the risks involved; (ii) prepare a business continuity plan for continuation of its operations during an emergency; (iii) ensure timely deployment of workforce during an emergency; and (iv) prepare a strategy for maintaining a contingency stock of NFIs, undertake on-site and post distribution monitoring of NFIs distributed, and conduct regular reconciliations between NFIs issued and those distributed to beneficiaries. Failure to follow these actions could result in humanitarian support being provided in an ad hoc and uncoordinated manner, which could expose UNHCR to operational and reputational risks.

18. During the emergency, the Representation, in coordination with the Government of Greece, partners and inter-agency working groups, maintained its presence at key entry and exit points and provided budgetary and human resources to meet the growing needs of persons of concern; and assisted more than 980,000 persons arriving in Greece with NFIs worth \$4.2 million. The Regional Bureau for Europe prepared a regional contingency plan in February 2016 and revised it in June 2016. The Representation further prepared a contingency plan to address the risks related to the possible closure of borders between Greece and the Former Yugoslav Republic of Macedonia in March 2016.

19. OIOS review of the Representation's emergency preparedness and response mechanisms, however, indicated the following:

- (i) The Representation drafted a contingency plan to address the risks associated with the 18 March 2016 European Union and Turkey joint statement only 6 months later, in September 2016. The contingency plan also did not: (i) consider the results of an inter-agency risk analysis undertaken; and (ii) identify focal points for the different contingency activities outlined in the plan.
- (ii) The Representation did not prepare a business continuity plan.

(iii) The arrival of emergency response teams and staff recruited through fast track appointments was delayed. For example, in Sub-Office Lesbos, 31 out of 42 staff arrived only in or after November 2015, although the level-2 emergency was declared in June 2015.

(iv) Although UNHCR had an NFI strategy for the region and the Representation maintained a contingency stock of NFIs, a separate NFI strategy for Greece had not been developed. The Representation also did not: maintain sufficient quantities of items like winterisation kits, folding beds and foam mattresses; reconcile NFIs distributed during the emergency; and undertake post-distribution monitoring activities.

20. The Representation explained that it was not prepared for the emergency, as it had only a small number of staff when the emergency was declared. It associated the shortcomings in the post-emergency phase with the lack of endorsement by the Government of the UNHCR Refugee Coordination Model as a tool for a coordinated response. Notwithstanding these explanations, OIOS was of the view that the Representation had not sufficiently prioritised the preparation of a contingency plan for endorsement between the Representation, the inter-agency members and the Government, and the development of a mechanism for periodically assessing its emergency preparedness and the adequacy of the emergency coordination structure. An inter-agency coordination structure was not established before the launching of the emergency response in 9 out of 12 locations in the mainland and the islands.

(2) The UNHCR Representation in Greece, in coordination with the Bureau for Europe, the Division of Human Resources Management, the Government of Greece and inter-agency working groups, should: (i) undertake regular assessments of emergency preparedness, including the adequacy of the inter-agency coordination structure; (ii) revise the contingency plan prepared in September 2016, based on identified risks, and allocate responsibilities for its implementation; (iii) develop a business continuity plan; and (iv) maintain minimum contingency stocks of non-food items and systematically monitor and reconcile their distribution to beneficiaries.

UNHCR accepted recommendation 2 and stated that the Representation would: (i) undertake an assessment of emergency preparedness and interagency coordination within the regional context; (ii) revise and update the contingency plan; (iii) prepare a comprehensive business continuity plan; and (iv) review the status of its contingency stocks. Recommendation 2 remains open pending receipt of: (i) the results of the emergency preparedness assessment done and evidence of the inter-agency coordination structures established; (ii) the revised contingency plan indicating the roles and responsibilities of inter-agency actors; (iii) the finalized business continuity plan; and (iv) stock reports demonstrating sufficiency of emergency stocks.

C. Partnership management

There was need to strengthen controls over management of projects implemented through partners

21. The Representation is required to: (i) select or retain partners through an Implementing Partnership Management Committee (IPMC) to ensure that the process is carried out with transparency and due diligence; (ii) sign Project Partnership Agreements (PPAs) in December of the year preceding project implementation; (iii) assess the partners' procurement capacity and competitive advantage before entrusting them with procurement using UNHCR funds; and (iv) monitor the implementation of project activities through a risk-based and multi-functional approach.

22. The Representation had established an IPMC which conducted two exercises in September and December 2014 to select partners for the 2015 programme cycle. Based on a desk review undertaken in October 2015, vetted by the IPMC, the Representation retained its 2014 partners both for 2015 and 2016. Additionally, in November 2015, through a wider solicitation of expression of interest, the Representation selected seven new partners for its regular project activities and seven partners for identifying accommodation space for implementing the new relocation scheme for the 2016 project year. The IPMC undertook a thorough assessment of all interested partners against predefined criteria and operational requirements. Therefore, OIOS concluded that the Representation had followed the due process for selection and retention of partners during the period under review.

23. The Representation concluded 11 PPAs in 2015 and 27 PPAs in 2016 in December of the year preceding project implementation. However, the Representation did not assess the capacity of the partners to undertake procurement on its behalf involving about \$10 million under 14 PPAs before signing the agreements. In addition, it used unspecified budget lines in the PPAs for services, miscellaneous food and supplies involving a total of \$7.5 million, which reduced the transparency of the intended use of the funds.

24. The Representation undertook regular financial and performance monitoring of its partners in 2015 and 2016. However, it did not follow a risk-based approach using multi-functional teams to monitor project activities. It did not ensure that mission reports of field staff were shared with the Project Control Unit in Athens to assist in operation-wide project monitoring. The monitoring teams did not systematically review the partners' controls in key operational activities and, therefore, did not detect and address some significant control breakdowns. For example:

- Two partners had not obtained prior approval from the Representation before sub-contracting project activities, such as child protection activities, interpretation services and consultancy services totalling \$3.4 million, to other partners and commercial contractors.
- A partner that distributed NFIs worth \$1.2 million had not obtained signatures/thumb impressions of the recipients and reconciled the quantity of stock distributed with the quantity received.
- The same partner had not reconciled payments made by its staff using four different credit cards totalling \$737,373 during the emergency.
- Another partner that procured accommodation rental services for persons of concern involving \$18.2 million had not established controls to ensure segregation of duties for the conduct of market surveys of rentals, negotiations with the landlords and determination of rental amounts, as the same staff member was tasked with all these activities.

25. The main reason for the cited weaknesses was that the Representation had not put in place adequate management supervision arrangements over project management activities. As a result, it was at risk of not being able to obtain value for money from the projects implemented through partners.

(3) The UNHCR Representation in Greece should strengthen management controls over project activities implemented through partners, including: (i) assessment of partners' capacity to undertake procurement on UNHCR's behalf; (ii) coordination of monitoring activities between the Country Office and offices in the field; and (iii) monitoring of project activities through a risk-based and multi-functional approach.

UNHCR accepted recommendation 3 and stated that the Representation had prepared a partner risk

register and a partner monitoring plan for 2017. The first quarter monitoring reports would be prepared by 15 June 2017. Procurement monitoring would be an integral part of the partner monitoring exercises. Recommendation 3 remains open pending receipt of: (i) evidence of the assessments done of partners' capacity to undertake procurement using UNHCR funds; and (ii) a sample of monitoring reports prepared in 2017 as evidence of the consistent use of risk-based and multi-functional approaches in project monitoring.

D. Provision of basic needs and services

The Representation needed to strengthen its monitoring arrangements over the provision of shelter, WASH and site management support services to persons of concern

26. The Representation is required to provide appropriate shelter solutions to persons of concern through: (i) identification of beneficiaries through a participatory approach, in consideration of their age, gender and diversity requirements; and (ii) development of a shelter strategy and SOPs for implementing the strategy. The Representation is also required to ensure that it provides shelter and WASH solutions as per the Sphere standards, i.e. the minimum standards prescribed by a group of humanitarian organisations, adopted by UNHCR.

27. At the time of the audit, there were 40 formal and informal sites accommodating over 38,000 persons of concern with an overall responsibility assumed by the Government. The Representation had received from the Government a 'focal point' role in the shelter sector at six sites and the WASH sector at four sites. In addition, it had been given an infrastructure improvement role at 15 sites.

28. OIOS review of the Representation's arrangements for the provision of shelter and WASH solutions and site management support indicated that the Representation, in coordination with the Government and inter-agency working groups, maintained a comprehensive site profile system. However, the review indicated the following areas for further improvement:

- (i) Although the Representation prepared a shelter strategy, it was not yet finalised and approved. The draft strategy was not developed in accordance with the guidelines contained in the UNHCR Global Strategy on Shelter and Settlement 2014-2018. The Representation also did not develop SOPs for implementing the strategy.
- (ii) The Representation did not have a system for identifying beneficiaries for allocation of shelters, taking into consideration their age, gender and diversity requirements, at those sites where UNHCR had been allocated specific responsibilities by the authorities. In addition, the Representation did not prepare a plan for re-orienting its existing approach from provision of transit type shelter facilities to provision of semi-permanent and permanent solutions, as would have been expected given the progressive stabilisation of the operations in Greece.
- (iii) The Representation did not ensure that the provision of shelter and WASH solutions was in accordance with the Sphere standards. For example in Thessaloniki, out of 22 sites, the covered living space provided to persons of concern was below the standard of 3.5 square meters at 6 sites, and WASH areas were not fully segregated by gender at 17 sites.
- (iv) The Representation had developed a site management support strategy but it was still in draft and had not been implemented due to lack of feedback from the authorities. In addition, 64 per cent of the sites did not have the required fire safety plan.

29. The Representation attributed the cited weaknesses to lack of a clear plan by the Government and the participation of multiple humanitarian actors without a Government coordination plan which contributed to the above-mentioned weaknesses. However, these systemic weaknesses also occurred at sites where the Representation had been given the clear role for coordinating shelter, WASH and site management support activities. As a result, there was a risk that the Representation would not be able to provide the basic level of shelter and WASH solutions and site management support to persons of concern, exposing UNHCR to potential reputational risks.

(4) The UNHCR Representation in Greece, in coordination with the Government of Greece and inter-agency working groups, should: (i) prepare a shelter strategy in alignment with the UNHCR Global Strategy for Settlement and Shelter and develop standard operating procedures for its implementation; (ii) ensure that shelter and water, sanitation and hygiene solutions are provided in accordance with Sphere standards; and (iii) finalise the site management support strategy and ensure that all sites have a fire safety plan.

UNHCR accepted recommendation 4 and stated that the Representation was working on: (i) finalizing a shelter strategy, in coordination with the Division of Programme Support and Management; and (ii) ensuring adherence of site profiles to Sphere standards. Additionally, the Representation had provided the necessary fire-fighting equipment at the sites and conducted training in using them. Recommendation 4 remains open pending receipt of: (i) the approved shelter strategy; and (ii) a sample of site profiles that indicate adherence to Sphere standards.

E. Provision of durable solutions

There was a need to strengthen monitoring of activities associated with the relocation scheme and risks related to return of persons of concern who were not able to submit an asylum claim on their arrival

30. The Representation is required to establish controls to identify and seek appropriate durable solutions to its persons of concern in coordination with partners and the host government. In particular, the Representation is required to: (i) provide information and interpretation services to new arrivals; (ii) identify asylum seekers for referral and provision of appropriate protection solutions; (iii) rent 20,000 accommodation places for persons of concern who arrived prior to 20 March 2016 and are eligible for relocation; and (iv) monitor risks of informal and forced return to Turkey of those who arrived after to 20 March 2016, in case they were not able to lodge an asylum claim.

31. Following the Council of the European Union decisions of 14 and 22 September 2015 to relocate some 66,400 asylum seekers from Greece to different European Union member states and Norway and Switzerland by 26 September 2017, the Representation: (a) provided information and interpretation services to persons of concern in coordination with the authorities and partners; (b) developed SOPs for accommodation and transportation of eligible persons of concern; (c) developed a system of weekly reporting on the accommodation places established and the number of persons of concern relocated to the European Union member states and Norway and Switzerland; (d) rented 12,650 accommodation spaces by September 2016; and (e) facilitated the relocation of 4,405 individuals since the beginning of the relocation scheme in November 2015. In January 2016, UNHCR made recommendations to all the stakeholders involved in the relocation process, based on experiences and lessons learned at the field level, to support the effective implementation of the process.

32. OIOS review of controls put in place by the Representation over the relocation scheme and visits to two accommodation places rented in Athens indicated that out of the 12,650 accommodations rented an

average of 2,200 places (18 per cent) remained unoccupied or unutilized each month, involving financial losses to UNHCR.

33. Review of the Representation's arrangements for protection monitoring of persons of concern who arrived after 20 March 2016 indicated that the Representation did not develop a mechanism to monitor the risk of informal and forced return of persons of concern who were not able to lodge an asylum claim on their arrival. For example, it had not put in place a system of regular sharing of information between the Government and UNHCR on the profile of persons registered, detained and/or returned to Turkey.

34. The above shortcomings could lead to the denial of social, legal, political and economic rights to persons of concern and expose UNHCR to reputational risks.

(5) The UNHCR Representation in Greece, in coordination with the Government of Greece, should develop a strategy for minimizing the vacancy rate of accommodations rented.

UNHCR accepted recommendation 5 and stated that the Representation would do its utmost to minimize the vacancy rates at all times and prepare a report on the efforts made to ensure a better match between family size and accommodation available. Recommendation 5 remains open pending receipt of evidence of controls established to monitor and minimize the vacancy rate of accommodations rented, including recent reports on the vacancy rate.

(6) The UNHCR Representation in Greece, in coordination with the Government of Greece, should establish a formal system for monitoring the risk of return of persons of concern who did not lodge an asylum claim on their arrival in Greece after 20 March 2016.

UNHCR accepted recommendation 6 and stated that the Representation was preparing a comprehensive report with examples on information provided to potential returnees and measures and systems in place to obtain information from the Government on arrivals and potential returnees. Recommendation 6 remains open pending receipt of evidence of: (i) information provided to potential returnees; and (ii) establishment of a system of obtaining information from the Government on the arrivals and potential returnees.

F. Financial tracking and reporting

There was a need to strengthen controls over the delegation of authority plan, cash management, management of open items, and voucher preparation and review process

35. The Representation is required to design, implement and maintain appropriate delegation of authority to mitigate the risks of incompatible functions; establish and monitor adequate controls over the management of cash and bank accounts; control disbursements of administrative expenditures and the voucher preparation and review process; monitor and report open items (accounts receivable); and ensure timely and accurate submission of monthly financial reports to UNHCR headquarters.

36. OIOS reviewed the financial management controls and a stratified random sample of 65 vouchers totalling \$26.3 million representing 20 per cent of the total expenditure of \$128.3 million during the period under review. The review indicated that the Representation regularly reconciled its bank accounts and submitted monthly and end-of-year financial reports to UNHCR headquarters. However, the following control weaknesses were observed:

- (i) Although the Representation had established and regularly updated its Delegation of Authority Plan, 40 of the 127 users with delegated authority in the MSRP system had conflicting roles. Additionally, the Representation had not ensured that: (a) the receiver of services and the requisition approver was the same person on the same transaction in 63 cases; and (b) the receiver of consultants and the purchase orders approver of consultants was not the same person on the same transaction in eight other cases.
- (ii) The Representation had not stamped any of the 65 vouchers reviewed as “Paid”, thereby increasing the risk of double payments.
- (iii) Out of the total of 3,913 vouchers prepared during the audit period totalling \$69.2 million, the Representation raised the purchase order in 121 cases involving \$2.5 million only after having received the invoices.
- (iv) The Representation had not: (a) liquidated open items totalling \$1.4 million as of September 2016; and (b) recorded in its accounts receivable an outstanding Value Added Tax claim of about \$56,839 which had been rejected by the Government.
- (v) Duplicate keys of the petty cash chest of the Sub-Office in Thessaloniki were not kept in an envelope under seal in the custody of the Head of Office, as required by UNHCR financial rules.

37. The above-mentioned shortcomings happened because the Representation had not established adequate supervisory review mechanisms to enforce full compliance with UNHCR rules on financial management. As a result, the Representation was exposed to financial risks, including risk of fraudulent transactions, loss of financial resources, and incorrect financial reporting.

(7) The UNHCR Representation in Greece should put in place an action plan for strengthening supervisory reviews over the delegation of authority plan, voucher preparation, management of accounts receivable, and petty cash management.

UNHCR accepted recommendation 7 and stated that the Representation took action to establish controls over: (i) the delegation of authority plan; (ii) the voucher preparation and approval process; (iii) liquidation of accounts receivables; and (iv) safe custody of petty cash. Based on the action taken and documentation provided by UNHCR, recommendation 7 has been closed.

G. Procurement and vendor management

There was a need to further strengthen monitoring and oversight arrangements over procurement and vendor management

38. The Representation is required to: (i) prepare an annual procurement plan according to identified needs; (ii) establish an effective vendor management system; (iii) initiate timely procurement activities in accordance with the procurement plan; and (iv) ensure adequate oversight over procurement activities to obtain best value for money. Additionally, according to the Exceptional Procedures for Procurement during Emergencies (EPPE), the Representation is required to: (i) submit to the Headquarters Committee on Contracts (HCC) for approval all procurement cases with a value above the revised threshold limit established for emergency operations; and (ii) report to the HCC on all procurement transactions that took place during the approved EPPE timeframe.

39. The total value of local procurement was \$25.7 million during the period under review. The Representation established a Local Committee on Contracts (LCC) in September 2015 and developed SOPs for procurement activities during an emergency.

40. Considering the increase in the size of the Greece operations and inherent risks in financial management in the environment where the Representation was operating, the Division of Financial and Administrative Management (DFAM) undertook a field support mission to Greece in April 2016. In its mission report, DFAM indicated that the Representation was aware of some irregularities in the procurement process and deviations from UNHCR procurement rules and procedures. Based on DFAM recommendations, the Representation started making significant efforts to regularise contracts. It received approval from the HCC for 19 cases of ex-post facto notification of expenditure involving \$6.3 million and from the Controller for 13 cases involving \$1.2 million. However, the HCC did not approve ex-post facto notification of expenditure incurred during the period from September 2015 to September 2016, involving \$11.2 million. These included 10 cases amounting to \$2.7 million which related to waivers approved beyond the LCC authority, 6 cases involving \$4.6 million related to lack of formal tendering or lack of proper authorization of contracts, and 6 cases for \$3.9 million related to overspending beyond the authorized ceilings of contracts awarded.

41. The Division of Emergency, Security and Supply (DESS) undertook a subsequent review and onsite training mission to Greece in September 2016. While indicating that the Representation had made efforts in all procurement cases to achieve best value for money, DESS stated in its mission report that the lack of compliance with the procurement rules and procedures originated from: (i) misinterpretation by the Representation of the increased threshold limits under the EPPE; and (ii) the exceptional circumstances and urgency of the need for the goods and services involved in these cases.

42. OIOS review of procurement activities, which included detailed testing of a sample of 60 procurement transactions valued at \$16.6 million, confirmed the results of the reviews done by DFAM and DESS. It was evident that there had been systemic shortcomings in the management of procurement activities and oversight through the LCC during the emergency. OIOS also observed control weaknesses in procurement planning and vendor management, which were yet to be addressed in the same rigour as the weaknesses in the procurement process. For example, by the time of the audit the Representation had not yet finalised its procurement plan for 2016. In addition, although it had constituted a Vendor Review Committee in May 2016 it did not prepare individual vendor files and identify that its vendor database contained duplicate records of the same vendor in 10 cases.

43. In response to the DESS mission report, the Representation established additional preventive controls through a tracking system developed to monitor expiry of the period of contracts and the approved threshold limits. In November 2016, the Representation explained to the UNHCR Controller that it acknowledged the ceiling breaches which were mostly related to procurement under volatile and demanding operational environment and added that its Supply Unit was now fully equipped to avoid recurrence of such practices in future.

(8) The UNHCR Representation in Greece should develop an action plan to ensure that: (i) a procurement plan is prepared for 2017; (ii) the vendor database is reviewed and cleaned up and all vendor files appropriately maintained; and (iii) members of the Local Committee on Contracts are adequately trained to provide effective oversight over procurement activities.

UNHCR accepted recommendation 8 and stated that: (i) the 2017 procurement plan for Greece was under final review; (ii) the report and minutes of the Representation's Vendor Review Committee were under preparation; and (iii) material was prepared for training the Representation's LCC

members. Recommendation 8 remains open pending receipt of evidence of: (i) the procurement plan prepared for 2017; (ii) minutes of the Vendor Review Committee demonstrating completion of the review of the vendor database and preparation of vendor files; and (iii) evidence of training activities undertaken for LCC members.

H. Human resources management

There was a need to strengthen controls over human resources management

44. The Representation is required to conduct an appropriate situational analysis before determining its workforce requirements to deliver successfully on its mandate. It should also undertake a cost-benefit analysis before deploying affiliate workforce and ensure that such personnel are adequately trained and sign the UNHCR Code of Conduct. The attendance of staff, including affiliate staff, should be monitored, and measures should be in place to ensure that all staff complete the mandatory UNHCR training courses.

45. For 2015 and 2016, the Representation had a total staff budget of \$17.5 million. As of September 2016, it had a workforce of 585, including 46 affiliate staff and 152 staff hired through a partner and seconded to the Greek Asylum Service. In February 2016, the Bureau for Europe with support from Organizational Development and Management Service (ODMS) undertook a mission to Greece to review the operation's structural and staffing architecture. Additionally, in October 2016, the Bureau for Europe undertook a mission to Greece to decide on the staffing parameters for 2017.

46. OIOS review of the arrangements put in place by the Representation over human resources management, however, indicated the following control weaknesses:

- (i) Although the operation was stabilizing progressively, the Representation continued to rely on temporary arrangements, emergency response teams, deployees, affiliate staff and staff on mission. The Representation had not undertaken a situational analysis to review and realign its staffing structure with the changed circumstances.
- (ii) The Representation did not make sufficient arrangements to provide new staff with information on their working conditions, such as salary, housing, and their duty stations within Greece.
- (iii) In recruiting and managing affiliate workforce, the Representation did not undertake a formal cost-benefit analysis before deploying them. Additionally, in nine cases selected randomly, it did not: (a) complete their performance appraisals; (b) maintain their attendance records; and (c) provide staff training in the areas specific to their work.
- (iv) The Representation did not: (a) establish adequate reporting lines for staff seconded to the Greek Asylum Service, although it continued to indicate them under its organigramme; and (b) ensure that the staff seconded to the Greek Asylum Service signed the UNHCR Code of Conduct.
- (v) The Representation did not put in place mechanisms to ensure that all staff complete the mandatory training courses. A total of 185 staff (44 affiliate staff and 141 regular UNHCR staff) had not completed the required training, which included, *inter alia*, courses in staff safety and security, sexual harassment and abuse of authority, International Public Sector Accounting Standards, and protection.

47. The cited control deficiencies resulted as the Representation had not established adequate monitoring arrangements over its human resources management activities. Therefore, the Representation

was at a risk of not having an appropriate structure and staffing arrangements to be able to respond to the needs of the persons of concern in an effective and sustained manner.

(9) The UNHCR Representation in Greece should strengthen controls over human resources management by: (i) aligning the staffing structure based on a situational analysis; (ii) developing a strategy for deploying and training its affiliate workforce; (iii) notifying new staff of the conditions of employment before their entry in duty; (iv) ensuring that staff seconded to the Greek Asylum Service sign the UNHCR Code of Conduct and clarifying their reporting lines; and (v) ensuring that all staff complete the mandatory training courses.

UNHCR accepted recommendation 9 and stated that the Representation had updated its information package for new staff. The staffing structure prepared based on a situational analysis, a report on induction trainings conducted, and an action plan and report on completion of mandatory training by all staff would be provided later. Recommendation 9 remains open pending receipt of evidence of: (i) the staffing structure established based on a situation analysis done; (ii) the induction training modules developed and used; and (iii) the action plan developed to ensure that all staff, including those seconded to the Greek Asylum Service and affiliate work force, complete the mandatory training courses.

V. ACKNOWLEDGEMENT

48. 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) Eleanor T. Burns
Director, Internal Audit Division
Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

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

Rec. no.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
1	The UNHCR Representation in Greece, in coordination with the Government of Greece and the Bureau for Europe, should enhance controls over its core protection activities by: (i) undertaking a participatory needs assessment at all sites; (ii) preparing a multi-year protection strategy; (iii) establishing appropriate standard operating procedures, case management tools and referral pathways; and (iv) ensuring the work plan developed for unaccompanied minor children is implemented as planned.	Important	O	Submission to OIOS of a copy of the finalized multi-year protection strategy, standard operating procedures, case management tools and information on referral pathways, as well as the report on the implementation of the work plan for interventions related to unaccompanied minors.	30 June 2017
2	The UNHCR Representation in Greece, in coordination with the Bureau for Europe, the Division of Human Resources Management, the Government of Greece and inter-agency working groups, should: (i) undertake regular assessments of emergency preparedness, including the adequacy of the inter-agency coordination structure; (ii) revise the contingency plan prepared in September 2016, based on identified risks, and allocate responsibilities for its implementation; (iii) develop a business continuity plan; and (iv) maintain minimum contingency stocks of non-food items and systematically monitor and reconcile their distribution to beneficiaries.	Important	O	Submission to OIOS of: (i) the results of the emergency preparedness assessment done and evidence of the inter-agency coordination structures established; (ii) the revised contingency plan indicating the roles and responsibilities of inter-agency actors; (iii) the finalized business continuity plan; and (iv) stock reports demonstrating sufficiency of emergency stocks.	15 September 2017
3	The UNHCR Representation in Greece should	Important	O	Submission to OIOS of: (i) evidence of the	15 June 2017

¹ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² Important recommendations address important (but not critical or pervasive) deficiencies 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.

³ C = closed, O = open

⁴ Date provided by UNHCR in response to recommendations.

STATUS OF AUDIT RECOMMENDATIONS

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

Rec. no.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
	strengthen management controls over project activities implemented through partners, including: (i) assessment of partners' capacity to undertake procurement on UNHCR's behalf; (ii) coordination of monitoring activities between the Country Office and offices in the field; and (iii) monitoring of project activities through a risk-based and multi-functional approach.			assessments done of partners' capacity to undertake procurement using UNHCR funds; and (ii) a sample of monitoring reports prepared in 2017 as evidence of the consistent use of risk-based and multi-functional approaches in project monitoring.	
4	The UNHCR Representation in Greece, in coordination with the Government of Greece and inter-agency working groups, should: (i) prepare a shelter strategy in alignment with the UNHCR Global Strategy for Settlement and Shelter and develop standard operating procedures for its implementation; (ii) ensure that shelter and water, sanitation and hygiene solutions are provided in accordance with Sphere standards; and (iii) finalize the site management support strategy and ensure that all sites have a fire safety plan.	Important	O	Submission to OIOS of: i) the approved shelter strategy; and (ii) a sample of site profiles that indicate adherence to Sphere standards.	30 June 2017
5	The UNHCR Representation in Greece, in coordination with the Government of Greece, should develop a strategy for minimizing the vacancy rate of accommodations rented.	Important	O	Submission to OIOS of evidence of controls established to monitor and minimize the vacancy rate of accommodations rented, including recent reports on the vacancy rate.	30 May 2017
6	The UNHCR Representation in Greece, in coordination with the Government of Greece, should establish a formal system for monitoring the risk of return of persons of concern who did not lodge an asylum claim on their arrival in Greece after 20 March 2016.	Important	O	Submission to OIOS of evidence of: (i) information provided to potential returnees; and (ii) establishment of a system of obtaining information from the Government on the arrivals and potential returnees.	30 May 2017
7	The UNHCR Representation in Greece should put in place an action plan for strengthening supervisory reviews over the delegation of authority plan, voucher preparation, management of accounts receivable, and petty cash management.	Important	C	Action completed.	Implemented

STATUS OF AUDIT RECOMMENDATIONS

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

Rec. no.	Recommendation	Critical ¹ / Important ²	C/ O ³	Actions needed to close recommendation	Implementation date ⁴
8	The UNHCR Representation in Greece should develop an action plan to ensure that: (i) a procurement plan is prepared for 2017; (ii) the vendor database is reviewed and cleaned up and all vendor files appropriately maintained; and (iii) members of the Local Committee on Contracts are adequately trained to provide effective oversight over procurement activities.	Important	O	Submission to OIOS of evidence of: (i) the procurement plan prepared for 2017; (ii) minutes of the Vendor Review Committee demonstrating completion of the review of the vendor database and preparation of vendor files; and (iii) evidence of training activities undertaken for LCC members.	30 April 2017
9	The UNHCR Representation in Greece should strengthen controls over human resources management by: (i) aligning the staffing structure based on a situational analysis; (ii) developing a strategy for deploying and training its affiliate workforce; (iii) notifying new staff of the conditions of employment before their entry in duty; (iv) ensuring that staff seconded to the Greek Asylum Service sign the UNHCR Code of Conduct and clarifying their reporting lines; and (v) ensuring that all staff complete the mandatory training courses.	Important	O	Submission to OIOS of evidence of: (i) the staffing structure established based on a situation analysis done; (ii) the induction training modules developed and used; and (iii) the action plan developed to ensure that all staff, including those seconded to the Greek Asylum Service and affiliate work force, complete the mandatory training courses.	15 June 2017

APPENDIX I

Management Response

Management Response

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

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	The UNHCR Representation in Greece, in coordination with the Government of Greece and the Bureau for Europe, should enhance controls over its core protection activities by: (i) undertaking a participatory needs assessment at all sites; (ii) preparing a multi-year protection strategy; (iii) establishing appropriate standard operating procedures, case management tools and referral pathways; and (iv) ensuring the work plan developed for unaccompanied minor children is implemented as planned.	Important	Yes	Asst.Rep. Protection	(i) 15/04/2017 (ii) 15/04/2017 (iii) 30/06/2017 (iv) 30/06/2017	(i) A participatory needs assessment was completed and relevant reports were shared with OIOS on 11 April 2017. (ii) A multi-year protection strategy is completed and will be shared by 15 April along with 8 recommendations shared with the Greek Government. (iii) Standard operating procedures, case management tools and information on referral pathways are to be consolidated. (iv) A work plan for interventions related to unaccompanied minors is in place. The work plan and a report on implementation are to be finalized by 30 June 2017.
2	The UNHCR Representation in Greece, in coordination with the Bureau for Europe, the Division of Human Resources Management, the Government of Greece and inter-agency working groups, should: (i) undertake regular assessments of	Important	Yes	Asst.Rep. Operations	(i) 15/09/2017 (ii) 30/06/2017 (iii) 30/06/2017 (iv) 30/06/2017	(i) The Greek operation will solicit support from The Bureau of Europe, Division of Emergency, Security and Supply and Division of Human Resources to undertake an assessment of Emergency Preparedness and

¹ Critical recommendations address critical and/or pervasive deficiencies in governance, risk management or control processes, such that reasonable assurance cannot be provided with regard to the achievement of control and/or business objectives under review.

² Important recommendations address important (but not critical or pervasive) deficiencies 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.

Management Response

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

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	<p>emergency preparedness, including the adequacy of the inter-agency coordination structure; (ii) revise the contingency plan prepared in September 2016, based on identified risks, and allocate responsibilities for its implementation; (iii) develop a business continuity plan; and (iv) maintain minimum contingency stocks of non-food items and systematically monitor and reconcile their distribution to beneficiaries.</p>					<p>Interagency Coordination within a regional context.</p> <p>(ii) The September 2016 contingency plan will be revised and updated to reflect changes in the political and operational environment.</p> <p>(iii) Work to prepare a comprehensive business continuity plan (BCP) for the operations in Greece has been initiated. The final BCP will be shared by 30 June 2017.</p> <p>(iv) Based on the emerging funding and changing operational realities for 2017, the Representation is currently reviewing activities and its engagement. The need for contingency stocks will be part of this ongoing assessment/review.</p> <p>A final paper including contingency stock preparedness, structure and levels will be prepared and submitted for necessary review and approval by headquarters. The proposal is to be finalized by 30 June 2017.</p>
3	<p>The UNHCR Representation in Greece should strengthen management controls over project activities implemented through partners, including: (i) assessment of partners' capacity to undertake</p>	Important	Yes	Asst.Rep. Operations	<p>(i) 30/04/2017 (ii) 15/06/2017 (iii) 30/04/2017</p>	<p>(i) Partner pre-qualification for procurement is undertaken at Headquarters. Monitoring of local procurement capacity and adherence to UNHCR rules and regulations</p>

Management Response

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

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	procurement on UNHCR's behalf; (ii) coordination of monitoring activities between the Country Office and offices in the field; and (iii) monitoring of project activities through a risk-based and multi-functional approach.					<p>takes place locally. A partner risk register has been prepared and will be shared by 30 April 2017. Procurement compliance is an integral part of periodic partner monitoring exercises undertaken by the operation, jointly conducted by Project Control, Programme and Supply staff.</p> <p>(ii) A 2017 partner monitoring plan has been prepared and the first quarter monitoring will commence in early April. The monitoring will be undertaken in coordination with field offices. Partner Monitoring Reports will be shared by 15 June 2017.</p> <p>(iii) A 2017 partner risk register is being prepared and will be available by 30 April 2017. A 2017 Multifunctional Partner Monitoring Plan is also being prepared.</p>
4	The UNHCR Representation in Greece, in coordination with the Government of Greece and inter-agency working groups, should: (i) prepare a shelter strategy in alignment with the UNHCR Global Strategy for Settlement and Shelter and develop standard operating procedures for its implementation; (ii) ensure that shelter and water, sanitation and hygiene solutions are provided in accordance with	Important	Yes	Asst.Rep. Operations	(i) 30/04/2017 (ii) 30/06/2017 (iii) 30/06/2017	(i) A shelter strategy is currently being prepared following a support mission undertaken by DPSM. The strategy will reflect ongoing Government decisions regarding changes in the accommodation site structure from 50 sites to 23 sites, gradual handover of responsibilities to partners and adjustments to UNHCR's expected involvement in 4

Management Response

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

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	Sphere standards; and (iii) finalize the site management support strategy and ensure that all sites have a fire safety plan.					<p>sites for 2017. The strategy will be finalized by 30 April 2017.</p> <p>(ii) Site profiles adherence to Sphere standards are under preparation.</p> <p>(iii) Fire-fighting equipment was distributed and trainings conducted in sites as part of winterization efforts. Report on fire-fighting improvements and trainings conducted will soon be available.</p>
5	The UNHCR Representation in Greece, in coordination with the Government of Greece, should develop a strategy for minimizing the vacancy rate of accommodations rented.	Important	Yes	Asst.Rep. Operations	30/05/2017	<p>The role of the Government in the management of the UNHCR accommodation scheme is limited. UNHCR is responsible for ensuring minimum vacancy rates of available accommodation. Significant progress in this field has already been reported to OIOS. A zero vacancy rate is only achievable when the available accommodation is fully matching the family composition in all locations at all times i.e. five family members in an apartment suitable for five people. UNHCR is doing its utmost to minimize the vacancy rates at all times as an integrated part of planning and implementation.</p> <p>A report describing on-going efforts, measures put in place and results to ensure a better match between family composition and available</p>

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

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
						accommodation will be prepared.
6	The UNHCR Representation in Greece, in coordination with the Government of Greece, should establish a formal system for monitoring the risk of return of persons of concern who did not lodge an asylum claim on their arrival in Greece after 20 March 2016.	Important	Yes	Asst.Rep. Protection	30/05/2017	Consolidation of a comprehensive report for monitoring returns is ongoing and will include; (i) Examples on information provided to potential returnees. (ii) Measures and systems in place to obtain Government information on arrivals and potential returnees.
7	The UNHCR Representation in Greece should put in place an action plan for strengthening supervisory reviews over the delegation of authority plan, voucher preparation, management of accounts receivable, and petty cash management.	Important	Yes	Snr.Admin Off.	15/06/2017	An action plan will be prepared and aligned with the upgrade of the MSRP system and the new processing and control requirements in relation to Cash Based Interventions. The following documents were shared to OIOS on 11 April 2017. (i) Copy of the latest Delegation of Authority Plan. (ii) Details on the voucher preparation and approval process. (iii) Procedures for liquidation of accounts receivables. (iv) Instructions on safe custody of petty cash safes.
8	The UNHCR Representation in Greece should develop an action plan to ensure that: (i) a procurement plan is prepared for 2017; (ii) the vendor database is reviewed	Important	Yes	Asst.Rep. Operations	(i) 30/04/2017 (ii) 30/04/2017 (iii) 30/04/2017	(i) The 2017 Procurement plan is under final review. (ii) The Vendor Review Committee

Management Response

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

Rec. no.	Recommendation	Critical ¹ / Important ²	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	and cleaned up and all vendor files appropriately maintained; and (iii) members of the Local Committee on Contracts are adequately trained to provide effective oversight over procurement activities.					report and minutes are under preparation. (iii) Training Materials have been prepared and are being disseminated to all LCC members. A package of the materials will be shared by 30 April along with an implementation report.
9	The UNHCR Representation in Greece should strengthen controls over human resources management by: (i) aligning the staffing structure based on a situational analysis; (ii) developing a strategy for deploying and training its affiliate workforce; (iii) notifying new staff of the conditions of employment before their entry in duty; (iv) ensuring that staff seconded to the Greek Asylum Service sign the UNHCR Code of Conduct and clarifying their reporting lines; and (v) ensuring that all staff complete the mandatory training courses.	Important	Yes	Snr.Admin Off.	(i) 30/04/2017 (ii) 15/05/2017 (iii) 30/04/2017 (iv) 15/06/2017	(i) A staffing structure based on a situational analysis will be shared including procedures followed. (ii) A report on induction trainings is to be prepared and shared by 15 May 2017. (iii) A copy of the updated information package for new staff is completed and will be shared by 30 April 2017. (iv) An action plan and a report on completion of mandatory training programmes for all staff, including those seconded to the Greek Asylum Service and affiliate workforce, are to be prepared.