



INTERNAL AUDIT DIVISION

REPORT 2024/021

Audit of mandate refugee status determination processes of the Office of the United Nations High Commissioner for Refugees at the South Africa Multi-Country Office

Approaches to strategic use of mandate refugee status determination, training and capacity development and case identification were adequate; however, some processes needed to be strengthened for enhanced effectiveness

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Audit of mandate refugee status determination processes of the Office of the United Nations High Commissioner for Refugees at the South Africa Multi-Country Office

EXECUTIVE SUMMARY

The Office of Internal Oversight Services (OIOS) conducted a thematic audit of mandate refugee status determination (RSD) processes at the Office of the United Nations High Commissioner for Refugees (UNHCR). The thematic audit report (AR/2023/092) was issued in 2023 and contained overarching observations and recommendations addressed to relevant Bureaus and Departments.

This thematic audit also identified observations specific to the South Africa Multi-Country Office (SAMCO), which was one of the UNHCR offices covered as part of the audit. The current report includes such observations.

SAMCO's approaches to the strategic use of RSD, use of case processing modalities and training and capacity building were adequate. Good practices were noted regarding arrangements for case identification and prioritization. The effectiveness of the implementation of mandate RSD was however impacted by inconsistencies in the application of the RSD Procedural Standards, gaps in monitoring of long pending RSD cases and inadequate staff capacity. This resulted in backlogs, which could adversely affect the protection of asylum seekers and the credibility of the asylum system.

OIOS made three recommendations. To address issues identified in the audit, SAMCO needed to:

- Assess capacity gaps and implement a plan to address identified gaps, including by filling vacant positions;
- Identify partners in strategic locations to support remote RSD interview arrangements including the implementation of integrity controls such as biometric verification and spot checks, enhance the arrangements for interpreters, and strengthen case management and documentation controls; and
- Implement a plan to address the current mandate RSD cases backlog and review long pending active cases.

UNHCR accepted all recommendations, implemented two and has initiated action to implement the remaining one. Actions required to close the outstanding recommendation are indicated in Annex 1.

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Audit of mandate refugee status determination processes of the Office of the United Nations High Commissioner for Refugees at the South Africa Multi-Country Office

I. BACKGROUND

1. The Office of Internal Oversight Services (OIOS) conducted a thematic audit of mandate refugee status determination (RSD) processes at the Office of the United Nations High Commissioner for Refugees (UNHCR).¹
2. Mandate RSD is the process through which UNHCR determines if a person seeking international protection is a refugee under international law. It determines who falls within UNHCR mandate, enabling protection from refoulement as well as realization of rights for refugees. The thematic audit report issued in 2023 made overarching observations and recommendations addressed to relevant Bureaus and Departments. It included a review of the South Africa Multi-Country Office (SAMCO) and the current report addresses observations specific to the Office.
3. SAMCO conducts mandate RSD in nine countries of the Southern Africa region: Botswana, Comoros, Eswatini, Lesotho, Madagascar, Mauritius, Namibia, Seychelles and South Africa. Due to the distinct asylum normative frameworks, political contexts and governments' capacities, the asylum and protection space for forcibly displaced persons varied greatly among these countries, and this impacted SAMCO's mandate RSD activities. For example, the refugees' right to work was respected in four countries (South Africa, Namibia, Eswatini and Lesotho), as was their access to national services, assistance and naturalization. The island countries of Comoros, Madagascar, Mauritius and Seychelles were yet to develop asylum systems.
4. The size of populations also differed from country to country, which in combination with mixed movements, contributed to gaps in registration and asylum processing as well as significant RSD backlogs in national systems. The total population was of 251,856 forcibly displaced persons, mostly Congolese. Mandate RSD was under the responsibility of the Asylum, Law & Policy Unit (ALPU). From January 2020 to December 2022, SAMCO issued 1,160² individual RSD decisions and closed 251 cases.
5. SAMCO was headed by a Representative at the D-1 level and it had, as of 31 December 2022, 78 regular staff posts (27 Professional, 9 National and 42 General Service). Additionally, the office had 11 affiliate workforce staff. The Representative reported to the Director, Regional Bureau for Southern Africa (the Bureau or RBSA). SAMCO recorded a total expenditure of \$15 million in 2022.
6. Comments provided by UNHCR are incorporated in italics.

II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

7. The objective of the audit was to assess the adequacy and effectiveness of mandate RSD activities in ensuring that they were conducted strategically, and asylum seekers benefited from accurate, fair, timely and consistent decision-making.

¹ OIOS report number 2023/092, issued on 26 December 2023.

² Sources: RSD Dashboard and proGres v4, UNHCR registration and case management system.

8. OIOS conducted this audit from June to October 2023 covering the period from January 2020 to December 2022. Based on an activity-level risk assessment, the audit covered: (a) Strategic use of RSD; (b) Staff capacity; (c) Management of mandate RSD; and (d) Monitoring and reporting.

9. The audit methodology included: (a) interviews with key personnel in SAMCO and in the Bureau; (b) review of documentation; (c) analytical review of data; (d) sample reviews of RSD cases; and (e) observation of RSD interviews and recordkeeping practices.

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

III. AUDIT RESULTS

A. Strategic use of RSD

Valid approaches were defined for the strategic use of RSD

11. SAMCO satisfactorily articulated how it uses mandate RSD strategically. Specifically, its RSD Standard Operating Procedures (SOPs) of April 2023 framed mandate RSD within the UNHCR's strategic direction on RSD and stated that it was a tool used primarily to facilitate resettlement. Further, a concept note on 'Resettlement and Mandate Refugee Status Determination in Botswana' dated March 2022 shifted the office's approach from conducting mandate RSD for all Government-rejected asylum claims, to applying the office's standard strategic approach. This change considered the ALPU reduced capacity and aimed at managing the risk of additional influxes in Botswana, as well as the authorities' expectations that UNHCR would conduct mandate RSD and resettle individuals if it continued to reject claims.

12. Another good example of the strategic use of RSD was the office's approach to cases from Comoros and Madagascar, whereby, instead of conducting mandate RSD systematically as there were no national asylum systems in place, the office did so only where there were acute protection needs. This was because in Comoros registration and asylum seekers documentation issued by UNHCR already provided protection against refoulement, and in Madagascar, asylum seekers were generally tolerated by the authorities.

Need to obtain required clearances of mandate RSD case processing modalities and draft SOPs prior to implementation

13. Case-processing modality is the procedure that results in the determination of whether an individual is a refugee. It differs based on how refugee status is determined and is pre-determined based on caseloads/profiles or the individual's specific protection needs.

14. SAMCO used the modality of regular RSD for individuals whose eligibility for refugee status could not be determined in simplified, accelerated or merged case processing modalities.³ It introduced for its Congolese caseload from the Kivu and Ituri hosted in South Africa (35 per cent of the total caseload) two other modalities foreseen under UNHCR guidance.⁴ Specifically, in mid-2021, SAMCO started with 'Simplified RSD' and, in June 2023, it replaced this modality with 'Merged RSD - Resettlement'. A joint

³ Simplified RSD is a process whereby one or more aspects of Regular RSD are simplified to obtain efficiency gains of case processing. Accelerated RSD involves a substantive and individualized examination of the refugee status claim, but with an acceleration applied to all or some timelines in the RSD process. Merged modalities aim to capture in one interview either registration and RSD-related information (merged Registration-RSD) or RSD and resettlement-related information (merged RSD-Resettlement).

⁴ Aide Memoire & Glossary of case processing modalities, terms and concepts applicable to RSD under UNHCR's mandate

ALPU and Resettlement and Complementary Pathways Unit (RCPU) pilot had started at the time of the audit to implement the latter modality. Given that the office used mandate RSD mostly for resettlement consideration, this move was more than timely to increase process efficiencies and staff synergies between ALPU and RCPU.

15. Prior to implementation, UNHCR guidance requires, for the merged modality, approvals by the regional bureau concerned and the Division of International Protection (DIP). ALPU consulted with RBSA in February 2023. Nonetheless, there was no evidence of the approval and of the DIP involvement. ALPU explained that it had understood from the communications held with RBSA that they had been given the 'green light' to proceed and it was up to RBSA to liaise with DIP.

16. OIOS acknowledges that the organizational guidance is unclear on the format and aim of the approvals and relied on timely communications between operations, regional bureaux and DIP, over which SAMCO did not have full control. This omission was reported as a second line issue in the thematic audit report. Nonetheless, it was reasonable to expect from SAMCO that at the minimum SOPs had been drafted and cleared prior to the implementation of merged RSD – Resettlement, which was not the case. SAMCO could ensure that before implementing new mandate refugee status determination case processing modalities it explicitly obtains the required clearances from RBSA and DIP, supported by standard operating procedures.

B. Staff capacity

Need to assess capacity gaps and implement a plan to address identified gaps including filling vacancies

17. After the regionalization and decentralization process implemented in January 2020⁵, SAMCO took over the role of the South Africa Unit (SAU) in the former Regional Office for Southern Africa (ROSA), while ROSA became RBSA. The same positions previously in SAU, responsible for mandate RSD for the South Africa caseload only, transferred to SAMCO in January 2020 with additional geographical coverage and responsibilities, and formed the RSD Unit that in 2022 became ALPU. The revised areas of responsibility for the team included asylum systems capacity building, mandate RSD, law and policy, human rights, and other protection responsibilities across the region.

18. As of June 2023, the ALPU staff complement was four staff comprising: one RSD Officer (P-3), one Associate RSD Officer (P-2), one Senior RSD Associate (G-7, allocated at 50 per cent to mandate RSD activities) and one RSD Expert (affiliate workforce). The position of the Senior RSD Associate had just been filled prior to the audit after several months of being unencumbered and became vacant again during the audit. Since September 2020, SAMCO also welcomed successively four RSD experts, who conducted all the first instance casework, i.e., RSD interviews and recommendations of decisions, in the absence of the Senior RSD Associate. The high staff turnover required frequent recruitments and onboardings, which was a heavy burden for a small unit such as ALPU and negatively impacted on the delivery of mandate RSD activities.

19. ALPU estimated that it would process 705 individuals and submit between 352 and 564 individuals for resettlement consideration in 2023 if it operated at full staff capacity of 1.5 caseworkers and applied merged RSD - Resettlement for the Kivu and Ituri caseload by RCPU and regular RSD by ALPU. However, most of these assumptions did not materialize, since: (i) ALPU was not fully staffed for most of 2023; (ii) SAMCO only started implementing merged RSD - Resettlement mid-year; (iii) the sole caseworker's target

⁵ Organizational reform undertaken with the overarching objective to ensure that UNHCR was strengthened where it mattered the most, i.e., closest to beneficiaries, and staff were effectively positioned to make operational decisions.

of four cases per week was not attained; and (iv) the Associate RSD Officer did not get the extra support for the case reviews and the backlog of reviews stood at 60 individual cases. As a result, in 2023 as of 16 August, the Office had only recognized 96 individuals as refugees, i.e., 14 per cent of its projection.

20. Insufficient staffing was exacerbated by the inability of the operation to conduct speedy recruitment for the position of the Senior RSD Associate, which represented 33 per cent of the office's case processing capacity. This position was externally funded since May 2022, but the recruitment formalities were only completed in January 2023 and the selected candidate only joined SAMCO in May 2023, one year after the post became available.

21. Further, the office also had to prioritize its limited resources towards conducting mandate RSD to avert the risk of not meeting resettlement quotas. The audit noted that as of 31 December 2022, for approximately similar caseload sizes, the Southern Africa region had considerably less RSD staff than the Europe region (3 per cent vs 13 per cent),⁶ which could be used by SAMCO and RBSA to showcase the staffing shortages in the region.

(1) The UNHCR South Africa Representation and Multi-Country Office should, in coordination with the Regional Bureau for Southern Africa, identify capacity gaps and devise a viable plan to address them, including by timely recruiting to fill vacant positions.

UNHCR accepted recommendation 1 and stated that: (i) in the last two years, SAMCO had made requests to RBSA and DIP for surge capacity, which could not be addressed and this was even less feasible in 2024. The Office was looking for a more structural solution in dealing with its mandate RSD responsibility; (ii) in May 2024 it had re-assessed its RSD capacity and identified the capacity gaps; (iii) ALPU would increase the existent reviewer capacity by assigning the RSD Expert a reviewer role and would increase spot-checks by the RSD Officer. The case processing for Congolese from the Kivus had transferred in the meantime to RCPU; and (iv) it took note of the recommendation to expedite recruitment of vacant positions.

C. Management of mandate RSD

22. For the effective management of mandate RSD activities, adequate processes, physical conditions and tools need to be in place to support the full cycle of RSD processes from case opening to closure. OIOS observations on these aspects at SAMCO are detailed below.

Steps had been taken to strengthen case identification and prioritization, appeals and file management

Identification and prioritization of cases

23. Adequate identification and prioritization criteria/processes are important to ensure equal and fair access to RSD services among the population of the nine countries under SAMCO and to responsibly fill the resettlement pipeline. Its importance is heightened by the operational context in which SAMCO works, including predominance of remote processing modalities, lack of access to/incomplete and inaccurate registration data sets in national systems and significant fraud risk.

24. SAMCO satisfactorily used several channels to identify heightened protection needs, including a helpline (for South Africa only), walk-in assessments (in Botswana and Namibia), and referrals from

⁶ Sources: RSD Dashboard, which reported 785 RSD decisions in the Europe region from 2020 to 2022, and RSD Staffing Survey dated December 2022.

protection, partners, local authorities, civil society organizations and community focal points. Thereafter, the office used the following multi-layer and sequential tools and procedures to assess and prioritize cases: (i) locally developed partner tool to receive referrals from partners; (ii) triage by a Multi-Functional Team; (iii) profiling i.e., full intake by RCPU; (iv) deliberation by a multi-functional Protection Case Conference (PCC); (v) best interest determinations for children and/or medical assessment forms where applicable; and/or (vi) endorsements of individuals with specific needs by the Senior Protection Officer.

25. In 2022, PCC had referred 670 individuals for durable solutions consideration and at the time of the audit there were 200 cases waiting to be profiled by RCPU. Yet, and even though the process was a good practice, it may not be sustainable vis-a-vis the growing resettlement quota (1,700 individuals for 2023) and the office's capacity. On the other hand, not all cases went through the PCC, which potentially introduced inconsistencies in the assessments. This happened, for example, with recognized refugees identified for resettlement consideration in Namibia and Botswana because they were in protracted situations. The office explained that it had streamlined the identification of cases for resettlement purposes in 2023 and continuously engaged partners to enhance their capacity including identification and referrals.

Appeals process

26. As of 16 August 2023, SAMCO had 77 cases pending appeal. In July 2021, SAMCO took positive steps to address omissions in the appeals process by re-activating the process that had been previously suspended for some caseloads inherited from SAU and ROSA. It had also developed an action plan to implement the process retroactively through a phased issuance of notification letters of rejected decisions and/or by revisiting rejected cases to assess their continued/additional protection needs.

File management

27. SAMCO had a filing room holding physical files inherited from the former SAU and ROSA, as well as files transferred from countries in the region. The filing room was under the responsibility of the Registration Unit and access was adequately controlled through fingerprint scanners. There were no smoke detectors or fire extinguishers in the room, but the latter was corrected during the audit. There was also no inventory and tracking of physical files.

28. Nonetheless, there were positive developments in recordkeeping and file management, as SAMCO had moved to an e-filing system created with the support of RBSA and the Records and Archives Section at headquarters, whereby any new files were created electronically and pre-existent physical files were digitized gradually and incorporated in the electronic files. ALPU had its own restricted electronic filing organized as per the stages of the RSD process in proGres v4 to ensure coherence between repositories. ALPU also used proGres v4 systematically for case management, which was a significant improvement as compared with the practices of its predecessors SAU and ROSA.

Need to strengthen the arrangements for remote interviews, management of interpreters and case management

Interviews

29. Except for asylum seekers in Gauteng and in Botswana that were interviewed in person at a partner and UNHCR's office respectively, all other RSD interviews were done remotely. OIOS observed three interviews and noted that the caseworkers provided adequate information to the applicants on the objective of the interviews, duty to cooperate, purpose of note taking, consequences of fraud, right to ask for a break, interpretation arrangements, confidentiality of information, and confirmed the applicants' physical aptitude and their agreement with the remote interviews. For the two remote interviews observed, the caseworkers

also sent instructions in advance to the applicants on the channels and conditions at the applicants' locations that needed to be observed.

30. Nonetheless, the following problems were observed or reported by caseworkers in relation to the remote interviews: (i) frequent technical/connectivity issues led to the need to interrupt and re-schedule interviews; (ii) identities were not verified biometrically and facial verification was challenging or impossible; (iii) inaccurate or untimely translation; (iv) surroundings at the applicants' locations were often distracting both for the applicants and the interviewers; and (v) surroundings hindered confidentiality of information.

Arrangements for interpreters

31. SAMCO used a pool of interpreters managed by the Helpline Manager. They were community interpreters who did not have specialized skills, competencies and training. OIOS observed the following issues: (i) there were no contractual arrangements between the office and the interpreters as required by UNHCR guidance on interpreters;⁷ RCPU had started collecting signed Undertakings of Confidentiality and Impartiality as the Unit engaged with the interpreters, but there was no overview of who had signed the Undertakings and the process was not followed systematically by other units also using interpreters, including ALPU; (ii) delivery of training to interpreters was not tracked and the last recollection of UNHCR training for interpreters was from 2019; (iii) interpretation rates had not been revised since 2021; (iv) the payment process was inadequate, as the amounts due were settled through operational advances; and (v) performance evaluations were not done.

32. Furthermore, the Helpline Manager post was vacant and no replacement had been designated. The office also lacked SOPs for the management of interpreters, which could have prevented the omissions above.

Case management

33. OIOS reviewed the electronic files of 31 individual cases at different process stages and noted several issues as follows: (i) standard processing timelines were not observed in any of the cases; (ii) one case of potential exclusion of refugee status was pending since 2019, with three interviews held long apart, without any documented decision endorsements or other reviews and without a formal decision; (iii) relevant records were missing in several cases, including interview audio/video recordings of 13 individual cases, (derivative) assessments of 2 individual cases, and the details of the reviews done by RBSA and DIP of 7 sensitive individual cases; and (v) lack of reviews/spot checks carried out by the RSD Officer, who confirmed she did not have the time for these tasks due to her heavy workload.

(2) The UNHCR South Africa Representation and Multi-Country Office should identify partners in strategic locations to support remote refugee status determination interview arrangements including the implementation of integrity controls such as biometric verification and spot checks, enhance the arrangements for interpreters and strengthen case management and documentation controls.

UNHCR accepted recommendation 2 and stated that: (i) it had identified partners in Mauritius, South Africa (Durban and Cape Town) and Madagascar and interviews would start or had started at the partners' offices. Regarding biometric verification, while UNHCR will continue its efforts to use the Biometric Identity Management System (BIMS) more diligently especially in South Africa, this

⁷ Guidelines for the recruitment, training, supervision and conditions of service for interpreters in a refugee context, IOM/FOM 005/2009, 19 January 2009

remained challenging as UNHCR does not maintain an asylum seeker or refugee database. It only registered individuals in proGres once they were identified for case management, including RSD, which was done remotely without the opportunity for BIMS enrolment. UNHCR will consider BIMS enrolment during missions where persons were previously registered; (ii) the RSD Officer commits to participate in regular spot checks, which will also contribute to case reviews; (iii) UNHCR had developed an SOP for the management of interpreters since the audit that establishes clear roles and responsibilities. Acknowledging that the use of remote interpretation is not always beneficial, SAMCO will continue exploring alternative pathways to increase efficiency and effectiveness in this regard; and (iv) standard processing timelines had not been adhered to in certain cases due to the lack of reviewing capacity, which ALPU intended to increase.

D. Monitoring and reporting

Need to address mandate RSD backlogs

34. As of 16 August 2023, ALPU had a backlog of 547 active individual cases pending at different process stages as shown in Figure 1 below (with the years in the table referring to the RSD status date at the time of the analysis). This was a significant backlog, considering the size of the caseload and capacity of the office, which was on average less than 400 decisions per year between 2020 and 2022.

35. Unreliable data in proGres especially for cases dated from before 2020, limited staff capacity and high turnover, as well as the consequent inability of the office to proactively review active cases and assess whether mandate RSD remained relevant and strategic explained the backlog. Nonetheless, proactive reviews could start by identifying old cases, which could be potentially abandoned claims that could be easily filtered out, hence reducing the backlog. Backlogs could further spike staff frustration and burnout, decrease productivity and quality of decisions, and increase the risk of fraud. If unaddressed, they may also negatively impact the protection of asylum seekers and the credibility of UNHCR processes.

Figure 1. Mandate RSD case statistics in the SAMCO region

RSD status	2007	2009	2010	2011	2012	2014	2016	2018	2019	2020	2021	2022	2023	Total
Pending Interview							4			6	32	106	210	358
Pending Assessment								1	6	2	9	4	30	52
Pending Review		1	1	1	4	2	1		2		6	8	34	60
Pending Appeal Application											26	51		77
Total	1	1	1	4	2	1	4	1	8	8	73	169	274	547

Source: proGres v4

(3) The UNHCR South Africa Representation and Multi-Country Office, in consultation with the Regional Bureau for Southern Africa, should implement a plan to address the current mandate refugee status determination cases backlog in particular those long pending active cases dated from before 2020 and those pending interviews.

UNHCR accepted recommendation 3 and stated that it had taken the following measures to reduce the backlog: (i) increase of the case reviewing capacity; (ii) introduction of a simplified procedure for Pakistani Ahmadis; (iii) improvement of the identification process for cases/profiles likely to be recognized after RSD, which resulted in the identification of some 204 cases for which mandate RSD was likely no longer relevant and strategic. After re-profiling, they might be filtered out of the mandate RSD backlog. In addition, some caseloads who have outdated asylum claims will be filtered out of the backlog; and (iv) some 237 individuals out of the total active caseload pending mandate RSD (which is currently 617) were referred for mandate RSD in or before 2022. The ALPU will schedule and finalize those cases before 30 June 2025.

IV. ACKNOWLEDGEMENT

36. 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.

Internal Audit Division
Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

Audit of mandate refugee status determination processes of the Office of the United Nations High Commissioner for Refugees at the South Africa Multi-Country Office

Rec. no.	Recommendation	Critical⁸/ Important⁹	C/ O¹⁰	Actions needed to close recommendation	Implementation date¹¹
1	The UNHCR South Africa Representation and Multi-Country Office should, in coordination with the Regional Bureau for Southern Africa, identify capacity gaps and devise a viable plan to address them, including by timely recruiting to fill vacant positions.	Important	O	Drafting of a plan to address the capacity gaps identified.	31 December 2024
2	The UNHCR South Africa Representation and Multi-Country Office should identify partners in strategic locations to support remote refugee status determination interview arrangements including the implementation of integrity controls such as biometric verification and spot checks, enhance the arrangements for interpreters and strengthen case management and documentation controls.	Important	C	Action completed	Implemented
3	The UNHCR South Africa Representation and Multi-Country Office, in consultation with the Regional Bureau for Southern Africa, should implement a plan to address the current mandate refugee status determination cases backlog in particular those long pending active cases dated from before 2020 and those pending interviews.	Important	C	Action completed	Implemented

⁸ Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

⁹ Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

¹⁰ Please note the value C denotes closed recommendations whereas O refers to open recommendations.

¹¹ Date provided by UNHCR in response to recommendations.

APPENDIX I

Management Response

Management Response

Audit of mandate refugee status determination processes of the Office of the United Nations High Commissioner for Refugees at the South Africa Multi-Country Office

Rec. no.	Recommendation	Critical ¹² / Important ¹³	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
1	The UNHCR South Africa Representation and Multi-Country Office should, in coordination with the Regional Bureau for Southern Africa, identify capacity gaps and devise a viable plan to address them, including by timely recruiting to fill vacant positions.	Important	Yes	Senior Protection Officer / RSD Officer	31 December 2024	<p>OIOS notes that the existing capacity gaps could be addressed through alternative arrangements such as surge capacity, definition of attainable targets and/or internal reorganization of functions.</p> <p>1. Surge capacity: SAMCO appreciates the suggestion. In the last two years, SAMCO made requests to RBSA and DIP for additional surge capacity beyond the current capacity, which could not be addressed. This has now become even less feasible in 2024 within UNHCR's current operational framework. In addition, and as per the elaboration below, SAMCO is looking for a more structural solution in dealing with its mandate RSD responsibility, while surge staffing tend to be</p>

¹² Critical recommendations address those risk issues that require immediate management attention. Failure to take action could have a critical or significant adverse impact on the Organization.

¹³ Important recommendations address those risk issues that require timely management attention. Failure to take action could have a high or moderate adverse impact on the Organization.

Rec. no.	Recommendation	Critical ¹² / Important ¹³	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>generally a corrective measure.</p> <p>2. Definition of attainable targets [as per analysis provided separately with the response].</p> <p>3. Internal reorganization of functions: the ALP unit will ensure more reviewer capacity by assigning the DRC deployee a reviewer role, in addition to the increased spot-checks of the RSD Officer (below 2.2).</p> <p>4. SAMCO takes due note of the recommendation of expediting the current timeline for recruitment of vacant positions.</p>
2	The UNHCR South Africa Representation and Multi-Country Office should identify partners in strategic locations to support remote refugee status determination interview arrangements including the implementation of the integrity controls such as biometric verification and spot checks, enhance the arrangements for interpreters and strengthen case management and documentation controls.	Important	Yes	Associate RSD Officer / Registration and Identity Management Officer / Protection Associate	31 December 2024	<p>1. Remote RSD interview arrangements: In South Africa, two partners were identified in Durban and Cape Town. Asylum-seekers will be interviewed in their offices through a UNHCR laptop. In Mauritius, a partner was identified. In Madagascar, RSD interviews already take place at our implementing partners office.</p> <p>While UNHCR will continue its efforts to use BIMS more diligently during case management activities,</p>

Rec. no.	Recommendation	Critical ¹² / Important ¹³	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>especially for its activities in South Africa, this will remain challenging. UNHCR does not maintain an asylum-seeker or refugee database in South Africa, and only records individuals in proGres once identified for case management (including for RSD) purposes – this is generally done through remote recording, without the opportunity for BIMS enrolment. UNHCR will consider BIMS enrolment during missions where persons were previously recorded.</p> <ol style="list-style-type: none"> 2. Spot checks: The RSD Officer commits to participate in regular spot-checks, which in turn will also contribute to case review output. 3. Enhance the arrangements for interpreters: UNHCR has developed interpreters SOP since the audit, that establishes clear roles and responsibilities in the management of interpreters, though acknowledges that the use of remote interpretation is not always beneficial. SAMCO to continue exploring new or alternative pathways to

Rec. no.	Recommendation	Critical ¹² / Important ¹³	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>increase efficiency and effectiveness in this regard</p> <p>4. Strengthen case management and documentation controls: Standard processing timelines have at times not adhered to in certain cases due to the lack of reviewing capacity. As mentioned above, the ALP unit will increase its reviewing capacity to address this.</p>
3	The UNHCR South Africa Representation and Multi-Country Office, in consultation with the Regional Bureau for Southern Africa, should implement a plan to address the current mandate refugee status determination cases backlog in particular those long pending active cases dated from before 2020 and those pending interviews.	Important	Yes	Associate RSD Officer	31 December 2024	<p>Measures taken to reduce the backlog:</p> <ol style="list-style-type: none"> 1. As mentioned above, the ALP unit will increase its reviewing capacity. 2. A simplified procedure for Pakistani Ahmadis was introduced. 3. With regards to profiling for strategic RSD purposes, SAMCO has learned from the past and has tried to improve its identification process for cases/profiles likely to be recognized after RSD. This said, it is acknowledged that part of the pending backlog includes cases whose profile would very unlikely result in status determination recognition. SAMCO identified some 204 cases for which mandate RSD is likely no longer

Rec. no.	Recommendation	Critical ¹² / Important ¹³	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>relevant and strategic. After re-profiling, they might be filtered out of the mandate RSD backlog. In addition, some caseloads who have outdated asylum claims will be filtered out of the backlog.</p> <p>4. Some 237 individuals out of the total active caseload pending mandate RSD (which is currently 617) were referred for mandate RSD in or before 2022. The ALP unit will schedule and finalize those cases before 30 June 2025.</p>