



INTERNAL AUDIT DIVISION

REPORT 2015/168

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

Overall results relating to effective
management of the operations in Thailand
were initially assessed as partially
satisfactory. Implementation of four
important recommendations remains in
progress.

**FINAL OVERALL RATING: PARTIALLY
SATISFACTORY**

10 December 2015
Assignment No. AR2015/141/02

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AUDIT REPORT

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

2. In accordance with its mandate, OIOS provides assurance and advice on the adequacy and effectiveness of the United Nations internal control system, the primary objectives of which are to ensure (a) efficient and effective operations; (b) accurate financial and operational reporting; (c) safeguarding of assets; and (d) compliance with mandates, regulations and rules.

3. In 2011, UNHCR completed the restructuring of its Office of the Regional Representative for South East Asia in Bangkok. The restructuring resulted, among other things, in the creation of the UNHCR Representation in Thailand (hereinafter referred to as “the Representation”). As at December 2014, the Representation assisted 110,000 refugees from Myanmar (out of which 73,729 were registered refugees), and 9,000 urban refugees and asylum seekers. The Representation conducts registration and refugee status determination of urban asylum seekers and refugees in Thailand. It also makes arrangements for resettlement of urban asylum seekers and refugees to other countries and provides them with services like medical referrals, legal support and subsistence allowance. For the refugees in camps, the Representation promotes an acceptable protection environment in coordination with the Thai authorities. It fills gaps in the protection support and finds durable solutions through resettlement of camp-based refugees to third countries. It has also initiated steps to prepare for voluntary repatriation of refugees from Myanmar to their country of origin.

4. The Representation had expenditure of \$13.6 million in 2013 and \$14.3 million in 2014. To implement its projects, it worked with 11 partners in 2013 and 12 in 2014. The Representation’s Branch Office was based in Bangkok and it also had four Field Offices in Kanchanaburi, Mae Hong Son, Mae Sariang, and Mae Sot. The Field Offices supported protection and programme activities in the nine refugee camps at the Thailand-Myanmar border. The Representation also established an Office of the Field Coordinator and Information Management in Mae Sot to supervise border operations. The Representation was headed by a Representative at the D-1 level and, as at 31 December 2014, it had 77 regular posts and 124 affiliated workforce positions.

5. Comments provided by UNHCR are incorporated in *italics*.

II. OBJECTIVE AND SCOPE

6. The audit was conducted to assess the adequacy and effectiveness of UNHCR governance, risk management and control processes in providing reasonable assurance regarding the **effective management of UNHCR operations in Thailand**.

7. The audit was included in the OIOS 2015 risk based internal audit work plan for UNHCR due to risks related to the implementation of protection and programme activities in Thailand.

8. The key controls tested for the audit were: (a) project management; and (b) regulatory framework. For the purpose of this audit, OIOS defined these key controls as follows:

(a) **Project management** - controls that provide reasonable assurance that there is proper planning and implementation as well as accurate and complete monitoring and reporting of the Representation's project activities.

(b) **Regulatory framework** - controls that provide reasonable assurance that policies and procedures: (i) exist to guide the UNHCR operations in Thailand; (ii) are implemented consistently; and (iii) ensure the reliability and integrity of financial and operational information.

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

10. OIOS conducted the audit from April to August 2015. The audit covered the period from 1 January 2013 to 31 December 2014. The audit team visited the Branch Office in Bangkok, the Field Office in Mae Hang Son, and two refugee camps at the Myanmar border in Mae Hang Son.

11. OIOS conducted an activity-level risk assessment to identify and assess specific risk exposures, and to confirm the relevance of the selected key controls in mitigating associated risks. Through interviews and analytical reviews, OIOS assessed the existence and adequacy of internal controls and conducted necessary tests to determine their effectiveness.

III. AUDIT RESULTS

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

13. The Representation had established adequate controls over the use of the affiliate workforce, inventory management, and fleet and fuel management. However, there was a need for the Representation to: (i) comply with the procedures for selection and retention of partners; (ii) develop and implement an annual risk based plan for financial verification of projects implemented by partners; (iii) develop an action plan to strengthen anti-fraud measures relating to resettlement activities; (iv) put in place appropriate procedures and facilities for conducting refugee status determination cases; and (v) strengthen monitoring and oversight arrangements over procurement and vendor management.

14. The initial overall rating was based on the assessment of key controls presented in Table 1 below. The final overall rating is **partially satisfactory** as implementation of four important recommendations remains in progress.

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

Table 1
Assessment of key controls

Business objective	Key controls	Control objectives			
		Efficient and effective operations	Accurate financial and operational reporting	Safeguarding of assets	Compliance with mandates, regulations and rules
Effective management of UNHCR operations in Thailand	(a) Project management	Partially satisfactory	Partially satisfactory	Partially satisfactory	Partially satisfactory
	(b) Regulatory framework	Partially satisfactory	Partially satisfactory	Partially satisfactory	Partially satisfactory
FINAL OVERALL RATING: PARTIALLY SATISFACTORY					

A. Project management

Selection and retention of partners needed to be conducted in compliance with established procedures

15. The UNHCR Implementing Partnership Management Guidance Note requires the Representation to establish a multi-functional Implementing Partnership Management Committee, which should recommend selection and retention of partners to the Head of Office based on a thorough assessment of partners against predefined criteria and aligned with operational requirements. If operational constraints do not allow the regular selection procedures to be followed, the Representation should seek a waiver in this regard from the Implementing Partnership Management Service at UNHCR headquarters.

16. The Representation's Implementing Partnership Management Committee, in its meeting on 28 October 2014, recommended waiving the call for expression of interest for nine partners associated with various projects for 2015. In its request for the waiver for these nine partners, the Committee recorded that the Representation had limited options available, as the Committee for Coordination of Services to Displaced Persons in Thailand (the coordinating committee for 19 non-governmental organisations working in nine refugee camps along the Thailand-Myanmar border) did not allow any other non-governmental organisation to work in the camps. The Representative approved the recommendation of the Committee. However, contrary to UNHCR procedures, the Representation did not submit the waiver to the Implementing Partnership Management Service for approval.

17. The above shortcoming happened because the Representation did not know it needed to request a formal waiver from the Implementing Partnership Management Service. However, this exposed the Representation to the risk of working with partners who did not have the required expertise and would not be able to achieve agreed project results.

(1) The UNHCR Representation in Thailand should put in place arrangements to ensure that formal waivers for the requirements of the process of selection and retention of partners are requested, as applicable, in the future.

UNHCR accepted recommendation 1 and stated that the Representation was now following appropriate requirements for the selection and retention of partners. Recommendation 1 remains open pending receipt of evidence that the Implementing Partnership Management Service has granted waivers for all applicable 2016 projects.

There was a need to develop and implement a risk based plan for financial verifications

18. As per the UNHCR Manual, the Representation should prepare an annual risk based plan for financial verifications of projects implemented by partners to be undertaken by multi-functional teams. The purpose of these verifications is to verify expenditures incurred by partners and review the adequacy of partners' financial and procurement procedures. The Representation should also establish an adequate management supervision process to ensure the implementation of the required procedures over financial verification of partners.

19. During the period under review, the Representation implemented projects with a total value of \$10.3 million through its partners. Whilst the Representation did not have an annual plan to monitor the activities of its partners, it conducted systematic financial verification visits to each partner during 2013 and 2014. However, it usually scheduled these visits only after receipt of the partners' financial reports instead of planning the verifications in advance, in coordination with the partners, at the time of signing the project partnership agreements. There was also no evidence that it carried out an exercise to identify the risks associated with the partners to ensure that its financial verifications were risk based. OIOS reviewed a sample of 12 financial verification reports, related to 4 of the 12 partners, and visited 3 of the partners. The objective of the visits was to assess the effectiveness of the monitoring controls put in place by the Representation over the projects implemented under project partnership agreements. The review indicated the following shortcomings:

- The Representation had not ensured that one partner associated with disbursement of subsistence allowances to urban refugees, had adequate controls in place over the distribution process as required under the project partnership agreement. For example, the partner's staff printed the pin code on the back of each cash card posing a risk of use by unauthorised persons. Further, the beneficiaries returned the cards after use but the partner did not reconcile them with the list of cards issued to determine the exact number of cards actually returned.
- All the partners reviewed managed projects of different donors with the same managerial staff who received a share of salaries under each project. The partners stated that they apportioned the management salaries according to the time spent by the managerial staff on each project. However, the Representation had not ensured that the partners maintained a log of the time spent by the management on each project for fair allocation of their salaries.
- At one partner, responsible for implementing livelihood projects in 2014, the Representation had not adequately monitored that the partner followed the agreed procurement rules and procedures. For example, the partner cancelled its bidding process for greenhouses for four refugee camps and decided to purchase them directly from the market near the camps. The partner paid \$23,656 for 14 greenhouses from one supplier at the market and could not demonstrate that it had obtained the benefits of economies of scale and value for money from not undertaking a competitive bidding process. The partner recorded that the bidding process was cancelled as the lowest bidder would have taken 70 days to supply the greenhouses. However, the bidding documents indicated that the vendor had offered to supply 13 greenhouses within 15 days and one greenhouse within 30 to 45 days after award of contract.

20. The reason for the above shortcomings was that the Representation did not establish a risk based annual plan and an adequate management supervision process to ensure implementation of the required procedures over financial verification of partners. This prevented it from ensuring that its verification teams were conducting systematic and in-depth monitoring that would adequately cover high-risk transactions and ensure that the partnerships were adding value to UNHCR.

(2) The UNHCR Representation in Thailand should develop a risk based financial verification plan and put in place documented management supervision arrangements to ensure full implementation of the plan in accordance with UNHCR requirements.

UNHCR accepted recommendation 2 and stated that the Representation developed a project partnership monitoring framework for 2016 which assigned roles and responsibilities for financial verification of partners. It would prepare the risk based financial verification plan for 2016 after completion of the ongoing selection and retention process of partners. Recommendation 2 remains open pending receipt of documentary evidence that financial verifications are systematically conducted according to the risk based verification plan and that supervisory arrangements established over the implementation of financial verification processes are functioning as intended.

Measures for controlling the risk of resettlement related fraud needed strengthening

21. The UNHCR Policy and Procedural Guidelines on Addressing Resettlement Fraud Perpetrated by Refugees require the Representation to put in place arrangements to prevent and mitigate cases of potential fraud in resettlement. The Representation should use biometrics for identification and registration of refugees and complete a Resettlement Fraud Vulnerability Checklist in all its offices.

22. In 2014, the Representation made arrangements to resettle 7,170 refugees to 10 countries, and spent \$1.1 million on resettlement activities. It developed standard operating procedures on Investigating Cases of Alleged Resettlement Fraud Perpetrated by Refugees in Thailand in line with UNHCR guidelines. It also set up a fraud panel consisting of the Resettlement Officer, the Senior Protection Officer and the Senior Durable Solutions Officer who reviewed and adjudicated all complaints of fraud. At the time of the audit, there were 65 reported resettlement fraud cases of which 38 cases were under investigation while for the remaining 27 cases the investigations had not yet started. Despite the above-mentioned control mechanisms, a review of anti-fraud measures implemented by the Representation indicated the following weaknesses:

- The Representation did not use biometrics for the identification of refugees. Without biometrics data, the resettlement caseworkers could not verify that the refugee who appeared in the resettlement interview was the same person who had earlier undergone the refugee status determination interview.
- The Branch Office Bangkok completed the Resettlement Fraud Vulnerability Checklist after performing fraud vulnerability assessments in 2013 and 2014 and shared the results with the Division of International Protection at UNHCR headquarters. However, the same exercises were not conducted in the Field Offices in Thailand.

23. The reason for the above control weaknesses was that the Representation did not integrate biometric technology and vulnerability assessment procedures into all its protection operations. As a result, the Representation was exposed to increased risk of fraud in its resettlement activities.

(3) The UNHCR Representation in Thailand should use biometric technology for refugee identification and complete Resettlement Fraud Vulnerability Checklists in all Field Offices.

UNHCR accepted recommendation 3 and stated that the Representation completed the Resettlement Fraud Vulnerability Checklist in Field Offices. It also introduced biometric identification technology at the refugee camps. The Representation further introduced a Biometric Identity Management System in September 2015 for new arriving urban asylum seekers. The “legacy population” (pre-

September 2015 arrivals) would be enrolled with the new system and issued new ID Cards in lieu of paper certificates in the first quarter of 2016 through a verification exercise. Based on the action taken and documentation provided, recommendation 3 has been closed.

Procedures and facilities for conducting refugee status determination cases required improvement

24. According to UNHCR Procedural Standards for Refugee Status Determination under the UNHCR Mandate, the Representation should carry out a registration interview as soon as possible after an asylum seeker approaches its offices. In compliance with these Standards, the Representation decided to set a target of 120 days as a key indicator for the length of time from the registration to the first refugee status determination interview, 60 days from the first interview date to the final decision, and 150 days to determine the outcome of an appeal against the decision.

25. The Representation registered 5,411 urban refugees in 2014. A review of the actual data in comparison to the timelines of refugee status determination procedures and progress reflected in the Representation’s key indicator report indicated that, in 2014, the Representation: (a) did not conduct first instance interviews of 3,828 registered persons of concern because of the increasing number of asylum seekers and lack of resources; (b) took on average 261 days from registration to the first refugee status determination interview and 191 days from the first interview to the final decision; and (c) took on average 622 days to decide the outcome of the appeal against the decision.

26. The Representation attributed these shortcomings to: (a) the increase in the arrival of refugees and asylum seekers, which overwhelmed its capacity to process registration and refugee status determination arrangements; and (b) inadequate interview facilities consisting of only six interview rooms and a small waiting area. As a result, the Representation did not achieve its targets for the timeliness of the refugee status determination process.

(4) The UNHCR Representation in Thailand, in coordination with the Bureau for Asia and the Pacific, should implement an action plan to address the backlog in refugee status determination, including through resource allocation measures, and make arrangements to obtain adequate facilities for the status determination interviews.

UNHCR accepted recommendation 4 and stated that the Representation prepared an action plan for the refugee status determination operations. Also, it was looking for additional office space with the support of the Regional Office in Thailand and contacted the host government to help identify possible government facilities. Recommendation 4 remains open pending receipt of evidence that the backlog in refugee status determination is being successfully addressed and adequate facilities have been made available for the status determination interviews.

B. Regulatory framework

Controls over the use of the affiliate workforce were satisfactory

27. The UNHCR Guidelines on Affiliate Workforce Arrangements state that the Representation should not delegate authority to affiliated workforce for supervising UNHCR staff, approving official UNHCR policies, or issuing public information statements on its behalf. In 2014, the Representation spent \$2.4 million for the services of 124 affiliated staff. It utilized the services of most of the affiliated staff in its border operations. A review indicated that the Representation adequately planned for the use of affiliated staff and placed satisfactory controls over supervision and monitoring of their performance. The Representation’s Delegation of Authority Plan did not grant any authority to affiliated staff to

approve expenditures or perform supervisory roles over UNHCR staff. OIOS concluded that the Representation's controls over the use of the affiliate workforce were satisfactory.

Monitoring and oversight arrangements over procurement and vendor management needed strengthening

28. UNHCR procurement rules and procedures require the Representation to: (a) establish an effective vendor management system; (b) initiate procurement activities in accordance with an annual procurement plan to facilitate transparent and competitive procurement; (c) submit all procurement cases having an aggregate value of \$20,000 or above to a Local Committee on Contracts (LCC) established to oversee the Representation's procurement activities.

29. In 2013 and 2014, the Representation procured goods and services totalling \$4.8 million. The Representation established a Vendor Review Committee in 2014, but the Committee did not hold any meetings during the year. As a result, the vendor management system was not working effectively. For instance, the Representation: (a) registered vendors only after selection of suppliers for goods and services instead of conducting a formal evaluation when preparing its vendor roster; (b) maintained a list of 244 vendors in Excel sheets instead of developing a comprehensive database; and (c) did not undertake annual performance evaluations of the service providers.

30. A review of a sample of 31 purchase orders valued at \$1.7 million indicated that the Representation generally followed the procurement rules and procedures, including in terms of: (a) soliciting invitation to bids and requests for quotations; (b) conducting technical and commercial evaluation of the bids; (c) executing contracts; (d) issuing purchase orders; and (e) maintaining necessary documents such as contracts, purchase orders and requisitions. It also established an LCC which met regularly. However, OIOS observed the following deficiencies in the procurement activities:

- Whilst the Representation prepared annual plans for operational and administrative procurement in 2014, it did not carry out its procurement activities in accordance with the planned dates. It procured most of its good and services, and approved vouchers valued at \$879,102 in 2013 and \$1,016,193 in 2014, in the last two months of the year. Procurement at the close of year created undue pressure on the acquisition process.
- The Representation did not obtain approval from the LCC for the procurement of security services worth \$51,680 in 2013 and \$49,749 in 2014.
- The Representation did not monitor the aggregate value of procurement from individual vendors and, as a result, it did not notify the LCC about procurement of air travel agent services for \$35,633 in 2013 and for \$44,998 in 2014, which would have required approval by the LCC.

31. The above control deficiencies happened because of inadequate monitoring and oversight arrangements over the procurement and vendor management processes. As a result, there was a risk that the Representation was not fully obtaining value for money from its procurement activities.

(5) The UNHCR Representation in Thailand should develop local procedures that ensure appropriate monitoring and oversight over: (i) the development of a vendor database; (ii) adherence to the annual procurement plan; and (iii) submission of all procurement cases above the value of \$20,000 to the Local Committee on Contracts.

UNHCR accepted recommendation 5 and stated that the Representation's vendor database needed review and adjustments for its efficient use. In order to prepare and implement a procurement plan for 2016, the Representation's Supply Unit would gather requirements from the Field Offices in December 2015. Procurement cases above the value of \$20,000 were submitted to the LCC for approval. Recommendation 5 remains open pending receipt of documentary evidence of: (i)

completion of the review of the vendor database; (ii) systematic conduct of procurement activities in conformity with the approved procurement plan for 2016; and (iii) monitoring procedures put in place to ensure systematic submission of all procurement cases to the LCC that are within its purview.

Controls over inventory management were working effectively

32. The UNHCR Manual requires the Representation to implement effective controls over inventory in the warehouses. The Representation established warehouses in each of its Field Offices for facilitating distribution of non-food items to camp-based refugees. The Representation planned for contingency stock in the warehouses in its annual country operation plan. It designated the Assistant Regional Representative (Administration) as the Inventory Manager, while Heads of Field Offices were the inventory focal points of their respective warehouses. The Representation conducted periodic physical verifications of the inventory including year-end physical verifications in December 2013 and 2014. To validate the effectiveness of the Representation's controls over inventory management, OIOS visited the warehouse in the Field Office Mae Hang Son. The Representation had stored the inventory systematically using palettes and duly attached bin cards to them. A test verification of the items in the warehouse indicated that the Representation had updated its records and there were no stock discrepancies. OIOS concluded that the Representation had satisfactory controls in place over inventory management.

Controls over fleet and fuel management were satisfactory

33. According to the UNHCR Manual, the Representation is required to put in place a fleet and fuel management system with appropriate supervision, monitoring and reporting arrangements over the use of vehicles. During the period under review, the Representation had 24 vehicles. In addition, it provided 22 vehicles to its partners under right of use agreements. The Representation incurred expenditure of \$107,813 on the maintenance of its vehicle fleet in 2013 and 2014 and purchased fuel for the vehicles worth \$211,150. A review of a sample of logbooks and vouchers for fuel payments and repairs of vehicles did not indicate any control deficiencies. The Representation also had a system of preparing fuel efficiency reports for each vehicle. In addition, the Representation's Administration Unit reconciled the quantity of fuel used in vehicles with the details recorded in logbooks, fuel vouchers and transaction statements provided by the commercial fuel provider. OIOS concluded that the Representation's controls over fleet and fuel management were satisfactory.

IV. ACKNOWLEDGEMENT

34. 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) David Kanja
Assistant Secretary-General, Acting Head
Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

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

Recom. no.	Recommendation	Critical ² / Important ³	C/ O ⁴	Actions needed to close recommendation	Implementation date ⁵
1	The UNHCR Representation in Thailand should put in place arrangements to ensure that formal waivers for the requirements of the process of selection and retention of partners are requested, as applicable, in the future.	Important	O	Submission to OIOS of evidence that the Implementing Partnership Management Service has granted waivers for all applicable 2016 projects.	31 March 2016
2	The UNHCR Representation in Thailand should develop a risk-based financial verification plan and put in place documented management supervision arrangements to ensure full implementation of the plan in accordance with UNHCR requirements.	Important	O	Submission to OIOS of documentary evidence that financial verifications are systematically conducted according to the risk based verification plan and that supervisory arrangements established over the implementation of financial verification processes are functioning as intended.	31 March 2016
3	The UNHCR Representation in Thailand should use biometric technology for refugee identification and complete Resettlement Fraud Vulnerability Checklists in all Field Offices.	Important	C	Action completed	Implemented
4	The UNHCR Representation in Thailand, in coordination with the Bureau for Asia and the Pacific, should implement an action plan to address the backlog in refugee status determination, including through resource allocation measures, and make arrangements to obtain adequate facilities for the status determination interviews.	Important	O	Submission to OIOS of evidence that the backlog in refugee status determination is being successfully addressed and adequate facilities have been made available for the status determination interviews.	31 December 2016
5	The UNHCR Representation in Thailand should develop local procedures that ensure appropriate monitoring and oversight over: (i) the development of a vendor database; (ii) adherence to the annual	Important	O	Submission to OIOS of documentary evidence of: (i) completion of the review of the vendor database; (ii) systematic conduct of procurement activities in conformity with the approved	31 March 2016

² 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.

³ 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.

⁴ C = closed, O = open

⁵ Date provided by UNHCR in response to recommendations.

STATUS OF AUDIT RECOMMENDATIONS

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

Recom. no.	Recommendation	Critical ² / Important ³	C/ O ⁴	Actions needed to close recommendation	Implementation date ⁵
	procurement plan; and (iii) submission of all procurement cases above the value of \$20,000 to the Local Committee on Contracts.			procurement plan for 2016; and (iii) monitoring procedures put in place to ensure systematic submission of all procurement cases to the Local Committee on Contracts that are within the purview of the Committee.	

APPENDIX I

Management Response

Management Response

Audit of the operations in Thailand 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 Thailand should put in place arrangements to ensure that formal waivers for the requirements of the process of selection and retention of partners are requested, as applicable, in the future.	Important	Yes	Senior Programme Officer (Bangkok)	Completed (31 August 2015)	The UNHCR Representation in Thailand is now following appropriate requirements for the selection and retention of partners. The composition of Thailand's Implementing Partnership Management Committee (IPMC) was revised and approved on 29 September 2015.
2	The UNHCR Representation in Thailand should develop a risk-based financial verification plan and put in place documented management supervision arrangements to ensure full implementation of the plan in accordance with UNHCR requirements.	Important	Yes	Senior Programme Officer (Bangkok)	Completed (23 October 2015)	On 23 October 2015 UNHCR Thailand's Implementing Partnership Management Committee (IPMC) conducted a review of the Partner's Project Partnership Monitoring Framework piloted during the first three quarters of the year. The Committee highlighted the successful introduction and implementation of the Framework. The Representative sent the finalized version of the Project Partnerships Monitoring Framework for 2016 to all Heads of Field Offices and Heads of Units in Bangkok on 23 November 2015. The revised Monitoring Framework assigns roles (monitoring participants; monitoring focal points) and highlights the accountability of the Heads of Field Offices and the Heads of Units (accountable supervisors) in ensuring

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 Thailand 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>corporate compliance in the implementation of this Framework.</p> <p>The Representative approved the revised Risk-Based Financial Verification Plan for 2015 and addressed it to all Heads of Field Offices and Heads of Units in Bangkok on 23 November 2015. The plan highlights the linkage with the 2015 Project Partnership Monitoring Framework.</p> <p>The Risk-Based Financial Verification Plan for 2016 will be established once the selection and retention process is complete and the Project Partnership Agreements are signed.</p>
3	The UNHCR Representation in Thailand should use biometric technology for refugee identification and complete Resettlement Fraud Vulnerability Checklists in all Field Offices.	Important	Yes	<p>Senior Protection Officer (Border)</p> <p>Senior Protection Officer (Bangkok)</p>	<p>Completed (Border)</p> <p>Completed for all new arrivals since 1 September 2015. "Legacy population" enrolment scheduled for 1st quarter 2016, to be completed by the end of April 2016.</p>	<p>Border: Resettlement Fraud Vulnerability Checklists were completed by all Field Offices following the recommendation. In order to ensure that risks are continuously minimized in all the Field Offices, identified gaps will be addressed and followed up with. Biometric technology was introduced during the verification exercise at the beginning of 2015. This technology includes iris scanning and finger-printing.</p> <p>Bangkok: Fraud vulnerability checklists for the Bangkok Office were previously submitted. Biometric enrolment for all new arrivals among the urban refugee population commenced on 1 September 2015. As</p>

Management Response

Audit of the operations in Thailand 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
						planned, the “legacy population” (pre-September 2015 arrivals) will be enrolled with the biometric identity management system and issued new ID Cards in lieu of paper certificates in the first quarter of 2016 through a verification exercise.
4	The UNHCR Representation in Thailand, in coordination with the Bureau for Asia and the Pacific, should implement an action plan to address the backlog in refugee status determination, including through resource allocation measures, and make arrangements to obtain adequate facilities for the status determination interviews.	Important	Yes	Senior Protection Officer (RSD/Bangkok) Admin Officer (Bangkok)	Action Plan concerning RSD backlog completed (Nov 2015), with ongoing implementation. In terms of other/additional space, action remains ongoing	The action plan concerning the refugee status determination (RSD) was completed in November 2015. Action remains ongoing to obtain other/additional office space. The Representation has, since mid-2014, been regularly searching for suitable locations, with the support of the Regional Office. Discussions discussing the matter with the Ministry of Foreign Affairs to help identify possible unused Government facilities.
5	The UNHCR Representation in Thailand should develop local procedures that ensure appropriate monitoring and oversight over: (i) development of a vendor database; (ii) adherence to the annual procurement plan; and (iii) submission of all procurement cases above the value of \$20,000 to the Local Committee on Contracts.	Important	Yes	Admin and Finance Officer/Senior Supply Assistant	(i) 1 January 2016 (ii) 1 January 2016 (iii) Ongoing	(i) The vendor database is currently in place but needs to be reviewed and adjusted in order to be used more efficiently. (ii) The Supply Unit will request Field Offices to submit their needs for goods/services in December 2015. The procurement plan will be finalized and ready by January 2016. (iii) All procurement cases above the amount of USD 20,000 have been submitted to the Local Committee on Contracts for approval.