

### **REPORT 2016/084**

Review of recurrent security management issues in internal audit reports for field operations for the Office of the United Nations High Commissioner for Refugees

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### Review of recurrent security management issues in field operations internal audit reports for the Office of the United Nations High Commissioner for Refugees

#### I. BACKGROUND

- 1. The Office of Internal Oversight Services (OIOS) conducted a review of recurrent security management issues in field operations internal audit reports for the Office of the United Nations High Commissioner for Refugees.
- 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. UNHCR has 7,138 regular national and international staff present in 449 locations in 123 countries with different security situations. UNHCR also works with 740 partners who are present in many of these locations and in others where no UNHCR staff have access. As of 31 December 2014, the organization had \$159 million worth of property, plant and equipment and \$193 million worth of inventory in these locations. UNHCR seeks to safeguard its assets and provide as safe and secure a working environment as possible for its staff while also enabling access to protection and assistance to persons of concern. This requires measures to be in place for staff security as well as the ability to deploy and operate in high-risk environments.
- 4. UNHCR is part of the wider United Nations Security Management System. The primary responsibility for the security of all United Nations personnel, premises and property rests with the Host Governments in their function of maintaining law and order. The United Nations has however the duty to reinforce the capacity of the Host Government to fulfil these obligations under the United Nations Security Management System, overseen by the United Nations Department of Safety and Security (UNDSS). In each country where UNHCR operates, UNDSS on behalf of the Designated Official and Security Management Team is required to undertake a Security Risk Assessment and develop a Security Plan, Minimum Operating Security Standards (MOSS), and Residential Security Measures as required.
- 5. At UNHCR Headquarters, the Field Security Service (FSS) within the Division of Emergency, Security and Supply (DESS) is responsible for providing technical guidance and support to ensure that security is a core part of UNHCR operations globally and for strengthening the culture of security within the organization. FSS develops and updates UNHCR-wide security policies, guidelines, tools and training courses and monitors MOSS compliance. The Regional Bureaux are responsible for promoting understanding of and compliance with UNHCR's security policies in their respective regions.
- 6. At the country and regional level, UNHCR Representations are accountable for providing a safe working environment for their workforce and for creating a culture of security throughout the operation. In particular, Representations are responsible for: analyzing the local security situation; complying with UNHCR security policies as well as MOSS and Residential Security Measures; considering security risks in the design and implementation of the Operations Plan; ensuring their workforce are well informed of the security requirements and policies in place and have undertaken the relevant training; participating in

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<sup>&</sup>lt;sup>1</sup> Minimum Operating Residential Security Standards are being replaced by Residential Security Measures during 2016 following promulgated of the policy on Residential Security Measures by UNDSS.

the United Nations country Security Management Team (SMT); and requesting support from UNDSS as required. Representations have the authority to allocate resources to meet their security responsibilities.

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

#### II. OBJECTIVE, SCOPE AND METHODOLOGY

- 8. This engagement was conducted to review recurrent security management issues raised in recent OIOS internal audit reports, and to identify related improvements needed at the institutional level.
- 9. The review was included in the 2016 risk-based internal audit work plan for UNHCR because of the high inherent and residual security risks faced by many UNHCR operations and because OIOS field audits have raised many similar recommendations in this area.
- 10. The review was conducted from February to June 2016, and covered OIOS internal audit reports issued from 1 January 2013 to 31 December 2015. Security management is considered to be anything that relates to the security and safety of UNHCR staff, partner staff and property. Security and safety of persons of concern is an issue of Protection and is not considered as part of the scope for this review.
- 11. The methodology for the review involved the following steps:
  - a) Review of the 63 internal audit reports pertaining to UNHCR field operations issued between 1 January 2013 and 31 December 2015 to identify recurrent issues related to security management;
  - b) Identification of root causes of the recurrent issues;
  - c) Review of the status and adequacy of actions taken to implement the internal audit recommendations;
  - d) Review of the current control framework for security management (policies, manuals, agreements, systems and tools, as well as training, monitoring and oversight mechanisms), their evolution over the period covered, and any ongoing measures taken to enhance security in order to assess its adequacy in addressing the root causes of recurrent issues; and
  - e) Identification of additional improvements required at the institutional level.
- 12. As the focus of the review was on root causes of recurrent audit issues in security management, OIOS has only made recommendations to enhance the institution level controls. As regards the recommendations contained in the 63 internal audit reports issued during the period that still remain open, OIOS will close them only after appropriate corrective actions have been implemented by the respective UNHCR Representations.

#### III. RESULTS OF THE REVIEW

13. OIOS issued 63 internal audit reports on UNHCR field operations during the period of the review. Of these 63 audits, 36 were assessed as having high residual risks related to security and therefore OIOS tested security controls as part of the audit fieldwork. Of the 36 audits, OIOS identified control weaknesses related to security in 20 country operations, resulting in 25 recommendations. These recommendations were rated as important.<sup>2</sup> As of May 2016, 10 of the 25 recommendations remained

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<sup>&</sup>lt;sup>2</sup> 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.

open. For the 15 closed recommendations, the relevant UNHCR Representations had taken satisfactory action to address the control weaknesses.

14. A preliminary analysis of the 25 audit recommendations identified five recurrent issues, and as some recommendations were made to address more than one issue as shown in Table 1, 37 issues in total were considered in the review.

Table 1

Distribution of recommendations made between 1 January 2013 and 31 December 2015 per recurrent issue

Recurrent issue	Number of recurrent issues	Percentage of occurrence of recurrent issues
Non-compliance with routine MOSS requirements that can be addressed in the short term	15	41%
Non-compliance with complex MOSS requirements that can only be addressed in the medium term	9	24%
Lack of assessment of MOSS compliance	7	19%
Lack of controls to monitor and enforce completion of required security training	3	8%
Non-application of the security management accountabilities and responsibilities set out in the Global Management Accountability Framework and Security Management Policy	3	8%
Total	37	100%

- 15. OIOS concluded that institution level recommendations were not needed with regards to non-compliance with routine MOSS requirements and the lack of assessment of MOSS compliance given the action already taken by UNHCR to strengthen detective and corrective controls in these areas. However, UNHCR needed to: a) establish timelines for following up on protracted instances of non-compliance with MOSS; b) increase the capacity of mandatory classroom-based security courses in high risk operations and monitor and report on the completion of security training by Representatives and Heads of Office; and c) strengthen the system of functional accountability for security management through guidance and instructions to Bureau Directors on the performance management of Representatives and Heads of Office.
- 16. OIOS made four recommendations to address the issues identified. UNHCR accepted and implemented three recommendations and is in the process of implementing the remaining recommendation.

#### Non-compliance with routine MOSS requirements that can be addressed in the short term

Institutional controls to detect and correct non-compliance with routine MOSS were in place

- 17. The UNHCR Security Management Policy and Global Management Accountability Framework require Representations to comply with MOSS and to allocate sufficient budgetary and other resources to ensure compliance. Where there are gaps in MOSS compliance that can be addressed in the short term with minimal support from outside the Representation, they should be addressed immediately.
- 18. There were 15 recommendations that included issues related to non-compliance with MOSS which could be addressed in the short term. Common areas of non-compliance included: the absence of

evacuation plans; non-regular testing of communications equipment, insufficient fire prevention and detection measures, and lack of emergency supplies. Ten of the 15 recommendations had been implemented prior to the next annual assessment of MOSS compliance. For the remaining five, non-compliance was identified in the next annual assessment exercise and FSS provided support and advice to the operations to work towards achieving full compliance. Given that institutional controls were in place to detect and correct routine aspects of non-compliance with MOSS, OIOS is not raising an institution level recommendation in this report.

## There was a need to monitor and report on the completion of security training by Representatives and Heads of Office

- 19. UNHCR had implemented detective and corrective controls over routine MOSS compliance. However, the review identified the need for Representatives and Heads of Office to ensure that, through completing the FSS developed Security Management Learning Programme and the mandatory e-learning for SMT members provided by UNDSS, they had the skills, capacity and current knowledge to make appropriate decisions in fulfilling their security management responsibilities.
- 20. Within the scope of the review, 17 of the 20 Representatives had not taken the mandatory SMT elearning course, and 10 had not taken the Security Management Learning Programme. The latter course, while not mandatory, is strongly recommended for UNHCR managers in high security risk environments. Based on these results, OIOS reviewed a sample of training records for Representatives and Heads of Office of 38 of the highest security risk locations where UNHCR operates. Of these, 19 Representatives and Heads of Office had not taken the Security Management Learning Programme and of the 13 who were also SMT members, 9 had not taken the SMT e-learning course. FSS advised that as of 2016 all potential new Representatives were required to first complete the Certification Programme for Representatives, Deputy Representatives and Heads of (Sub) Office, and that candidates had to successfully pass the SMT e-learning course as part of this programme.
- 21. The Representatives' failure to complete the relevant courses increased the risk that they were not fully conversant on security related issues, and therefore were not properly articulating operational and security needs specific to UNHCR at SMT meetings where MOSS was deliberated and approved. Feedback provided from UNHCR operational managers indicated that MOSS in many countries did not adequately consider the operational priorities of UNHCR or take into consideration the dynamic nature of UNHCR operations. FSS agreed, and added that on occasion UNHCR operations were faced with a dilemma, as being fully MOSS compliant could have an adverse impact on operational effectiveness, and the well-being of persons of concern.
- 22. The low completion rate of key security management training courses resulted, in part, due to the lack of consolidated reporting on their completion to Bureau Directors who acted as line managers for the Representatives. Such reporting, if appropriately reviewed and followed up on, would identify instances of non-compliance with the requirement to complete the mandatory SMT e-learning course and highlight gaps in the completion of the Security Management Learning Programme. As security training is addressed more comprehensively later in this report, please refer to recommendation 3 under the section on security training.

#### Non-compliance with complex MOSS requirements that can only be addressed in the medium term

There was a need to develop timelines for following up on protracted non-compliance with MOSS

- 23. There were 9 recommendations that included issues related to non-compliance with MOSS that could only be addressed in the medium term by actions such as changing the location of the office or making a significant investment in improvements to existing premises.
- 24. These recommendations were raised in field operations operating in uncertain environments where the Representation was not certain if it would still need a physical presence in some locations in the near future. In these circumstances, operations were reluctant to make significant investments to achieve MOSS compliance for premises which may be shortly vacated. FSS advised that in these situations operations delayed action in anticipation of having more complete information in the future to make an informed decision on the investment. FSS further advised that while at a point of time the inaction appeared justified, over time, this led in many cases to a protracted state of non-compliance as the anticipated additional information never materialized. As a result, there was an increase in the vulnerabilities of these operations and cumulative exposure of staff and the organization to undue security risks.
- 25. These protracted cases of non-compliance with MOSS were therefore caused by a combination of uncertain operating environments, evolving operational imperatives, and financial constraints. Although these were external factors that cannot be fully controlled by UNHCR, the organization could better support field operations in making security management decisions in such operational contexts if there was a mechanism whereby, after a certain period of time, protracted cases of non-compliance with MOSS were discussed between DESS and the Bureau and, if still needed, senior management.
  - (1) The Division of Emergency, Security and Supply (DESS) should develop a mechanism whereby: (a) timelines for resolving protracted cases of non-compliance with Minimum Operating Security Standards in the field are set; (b) if compliance is not achieved within this timeline, DESS discusses the issue with the relevant Bureau; and (c) if the issue is still not resolved, a meeting will be held with the Bureau, DESS and the Assistant High Commissioner for Operations to reach a decision on how to proceed.

UNHCR accepted recommendation 1 and stated that the Field Security Service has developed a standard operating procedure for its facilitation of the annual MOSS review, which identifies procedures and timelines for resolving cases of non-compliance with MOSS. This includes discussion by DESS with the relevant Bureau and Operation to help find solutions, and if the problem persists, referral to the Assistant High Commissioner for Operations for a decision. Based on the action taken by DESS, recommendation 1 has been closed.

#### Lack of assessment of MOSS compliance

Action was taken to ensure field operations completed regular assessments of their compliance with MOSS

26. FSS requested Country and Regional Representations to complete a MOSS compliance self-assessment regularly. The frequency of the self-assessments was not specified in the UNHCR Security Management Policy and was instead communicated by e-mail to field operations. Prior to 2013 the assessment was requested twice a year. However, in 2013 the requirement was reduced to once a year.

27. There were 7 recommendations that included issues related to failure of UNHCR Representations to assess MOSS compliance twice a year. In five instances, assessments were completed once a year which is now in line with the current practice. In one audit, the MOSS self-assessment did not address all aspects of MOSS but the Representation corrected this promptly. The remaining recommendation related to the lack of a MOSS assessment of newly opened offices, but again, the Representation took prompt action to address this issue. Further, FSS introduced monitoring controls to ensure that field operations completed their annual assessments of MOSS compliance. In both 2014 and 2015, all operations completed their assessments for all offices and submitted the results to FSS. Late submissions were followed up on by FSS and escalated to Bureau Directors where necessary to ensure compliance. OIOS is therefore not raising an institution level recommendation in relation to this category of recommendations.

#### Lack of controls to monitor and enforce completion of required security training

There was a need to increase capacity of mandatory classroom based security courses in high risk operations

- 28. UNHCR requires staff to complete Basic and Advanced Security in the Field e-learning courses every three years. UNHCR staff completion of these courses is required by MOSS of almost all countries where UNHCR is present. In addition, as of May 2016 the MOSS of 29 countries where UNHCR had operations required the completion of the classroom based Safe and Secure Approaches in Field Environments (SSAFE) course provided in location by UNDSS.
- 29. There were three recommendations that included issues of observed failure to comply with mandatory training requirements. With regards to SSAFE training, this generally occurred because there were insufficient places available for all staff in the country to complete the course in a timely manner. This issue was exacerbated by the fact that staff who had completed the SSAFE course in one location had to complete the course again if they were relocated to another country where SSAFE was required. FSS had requested UNDSS to allow UNHCR security personnel, in addition to UNDSS personnel, to deliver the SSAFE courses in multiple locations to increase capacity but these requests were not consistently approved.
- 30. With regards to the e-learning courses, the UNHCR global compliance rate with both mandatory courses was low. As of May 2016, out of 10,298 regular and affiliate staff registered on the UNHCR e-learning platform, only 7,163 (70 per cent) had a valid certificate for Basic Security in the Field and only 5,270 (51 per cent) had a valid certificate for Advanced Security in the Field. This was attributed to staff in field operations not seeing the added value of completing the courses, as: (a) the content was not considered relevant to particular operations; and (b) the requirement to re-take the course every three years was seen as excessive.
- 31. To address the above poor compliance rate, FSS considered introducing sanctions for non-compliance but considered that such controls could be counterproductive. UNHCR operational managers suggested replacing the requirement for re-taking the e-learning courses every three years with an annual briefing on security delivered by a trained security professional, tailored to the threats, vulnerabilities and mitigations in the particular location. In response to this suggestion, DESS recommended to the Inter-Agency Security Management Network that both e-learning courses would remain a requirement for completion once; however, thereafter instead of repetition of the same material, the training requirement could be "reimagined" to comprise, as an example, annual thematic guidance and materials provided centrally each year, but with implementation delegated locally and adapted to circumstances. DESS stated that it would pursue this through its representative in the Security Training Working Group of the Inter-Agency Security Management Network.

(2) The Division of Emergency, Security and Supply should make a formal request to the United Nations Department of Safety and Security to either provide sufficient capacity to enable all required staff to complete the Safe and Secure Approaches in Field Environments course in a timely manner or to allow UNHCR security professionals to deliver this mandatory classroom based training.

UNHCR accepted recommendation 2 and stated that it tabled this item in the 24th Meeting of the Inter-Agency Security Management Network in Montreux, Switzerland in June 2016, identifying both the need to ensure adequate resources for SSAFE and clarification whether UNHCR security professionals would be allowed to conduct this training. UNDSS noted that steps to review SSAFE training globally to ensure quality, consistency and capacity were underway. As for UNHCR's ability to conduct the training, DESS was following up with UNDSS. Based on the action taken by DESS, recommendation 2 has been closed.

(3) The Division of Emergency, Security and Supply should periodically analyze the completion of the Security Management Learning Programme and the Security Management Team e-learning course by Representatives and Heads of Office and regularly circulate statistics and areas of concern related to the completion of these courses to the Directors of Regional Bureaux who should take appropriate follow-up action.

UNHCR accepted recommendation 3 and stated that FSS will gather, analyze and share with Bureau Directors statistics on completion of mandatory SMT e-learning and other relevant security training in conjunction with the annual MOSS review. Recommendation 3 remains open pending receipt of evidence that DESS has analyzed the completion of the Security Management Learning Programme and SMT e-learning courses by Representatives and Heads of Office and circulated statistics and areas of concern related to these training courses to the Directors of Regional Bureaux for follow-up action.

## Non-application of the security management accountabilities and responsibilities set out in the Global Management Accountability Framework and Security Management Policy

The system of accountability for security management needed strengthening through guidance and instructions to Bureau Directors on the performance management of Representatives and Heads of Office

- 32. The UNHCR Global Management Accountability Framework and Security Management Policy set out accountabilities, responsibilities and authorities for country and regional operations as well as Representatives, security professionals and other staff with regards to security management. Standard job descriptions for Representatives and security professionals reflect these accountabilities, responsibilities and authorities. The UNHCR administrative instructions on performance management require supervisors to use the electronic Performance Appraisal Document (ePAD) to evaluate their staff's performance. The ePAD should include up to five work objectives in conformity with the job description of the staff member.
- 33. There were three recommendations that observed failure to apply accountabilities, responsibilities and authorities from the Global Management Accountability Framework and Security Management Policy which resulted in certain security management responsibilities not being discharged. The root cause of these control weaknesses was that relevant accountabilities, responsibilities and authorities were often not included in the work objectives of staff members' ePADs. A review of ePADs of the 20 Representatives in the scope of this review indicated that: (a) in 6 cases, work objectives mentioned security management; (b) in 10 cases, there was no mention of security management; and (c) in 4 cases,

the ePAD was not completed by the Representative. Review of relevant supervisor comments indicated that feedback on performance in security management matters was provided in only three instances.

- 34. A review of the most recently completed ePADs for Representatives and Heads of Office managing operations in 38 of the highest security risk locations showed that: (a) in 14 instances, the Representative/Head of Office had a work objective dedicated to security management; (b) in 10 instances, security management was mentioned as part of a broader work objective; and (c) in 14 instances, there was no reference to security management in the work objectives. The supervisors of these Representatives/Heads of Office provided feedback on security management performance in only 14 of the 38 cases.
- 35. The above resulted due to a lack of adequate guidelines and instructions to Bureau Directors on the operational circumstances under which security should feature prominently in the work objectives and performance feedback of Representatives. These guidelines should also give guidance on how to evaluate security management performance and make clear that Representatives include work objectives on security management in ePADs of Heads of Office in the high security risk areas of any given operation. In the absence of such guidance, there was an inconsistent approach to the extent to which Representatives and Heads of Office in high security risk operations were held accountable through the performance management system for their management of security.
  - (4) The Division of Human Resources Management should, in coordination with the Division of Emergency, Security and Supply, develop and issue guidelines and instructions to Bureau Directors on the operational circumstances under which security should feature prominently in the work objectives and performance feedback of Representatives and Heads of Office.

UNHCR accepted recommendation 4 and stated that the Division of Human Resources Management had issued instructions to all Representatives and Bureau Directors to include security in the work objectives and performance feedback of Representatives and Heads of Office. DESS had followed this with guidance on the operational circumstances when security should feature prominently. The Division of Human Resources Management would re-issue the instructions to Representatives on a yearly basis, at the inception of each annual performance cycle, regularly raising awareness among Representatives and their supervisors on the importance of having security management reflected in their performance appraisal. Based on the action taken and documentation provided by UNHCR, recommendation 4 has been closed.

#### 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.

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

#### STATUS OF REVIEW RECOMMENDATIONS

# Review of recurrent security management issues in internal audit reports for field operations for the Office of the United Nations High Commissioner for Refugees

Recom.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	C/ O <sup>3</sup>	Actions needed to close recommendation	Implementation date <sup>4</sup>
1	The Division of Emergency, Security and Supply (DESS) should develop a mechanism whereby: (a) timelines for resolving protracted cases of noncompliance with Minimum Operating Security Standards in the field are set; (b) if compliance is not achieved within this timeline, DESS discusses the issue with the relevant Bureau; and (c) if the issue is still not resolved, a meeting will be held with the Bureau, DESS and the Assistant High Commissioner for Operations to reach a decision on how to proceed.	Important	С	Action completed	Implemented
2	The Division of Emergency, Security and Supply should make a formal request to the United Nations Department of Safety and Security to either provide sufficient capacity to enable all required staff to complete the Safe and Secure Approaches in Field Environments course in a timely manner or to allow UNHCR security professionals to deliver this mandatory classroom based training.	Important	С	Action completed	Implemented
3	The Division of Emergency, Security and Supply should periodically analyze the completion of the Security Management Learning Programme and the Security Management Team e-learning course by Representatives and Heads of Office and regularly circulate statistics and areas of concern related to	Important	0	Submission to OIOS of evidence that DESS has analyzed the completion of the Security Management Learning Programme and SMT elearning courses by Representatives and Heads of Office and circulated statistics and areas of concern related to these training courses to the	28 February 2017

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> 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.

 $<sup>^{3}</sup>$  C = closed, O = open

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

#### STATUS OF REVIEW RECOMMENDATIONS

# Review of recurrent security management issues in internal audit reports for field operations for the Office of the United Nations High Commissioner for Refugees

Recom.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	C/ O <sup>3</sup>	Actions needed to close recommendation	Implementation date <sup>4</sup>
	the completion of these courses to the Directors of			Directors of Regional Bureaux for follow-up	
	Regional Bureaux who should take appropriate			action.	
	follow-up action.				
4	The Division of Human Resources Management	Important	C	Action completed	Implemented
	should, in coordination with the Division of				
	Emergency, Security and Supply, develop and issue				
	guidelines and instructions to Bureau Directors on				
	the operational circumstances under which security				
	should feature prominently in the work objectives				
	and performance feedback of Representatives and				
	Heads of Office.				

## **APPENDIX I**

**Management Response** 

#### **Management Response**

## Review of recurrent security management issues in field operations internal audit reports for the Office of the United Nations High Commissioner for Refugees

Rec.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
1	The Division of Emergency, Security and Supply (DESS) should develop a mechanism whereby: (a) timelines for resolving protracted cases of noncompliance with Minimum Operating Security Standards in the field are set; (b) if compliance is not achieved within this timeline, DESS discusses the issue with the relevant Bureau; and (c) if the issue is still not resolved, a meeting will be held with the Bureau, DESS and the Assistant High Commissioner for Operations to reach a decision on how to proceed.	Important	Yes	Head, Field Security Service	25/07/2016	The Field Security Service (FSS) has developed an internal Standard Operating Procedure (SOP) for its facilitation of the annual MOSS review, which identifies procedures and timelines for resolving cases of non-compliance with MOSS. This includes discussion by DESS with the relevant Bureau and Operation to help find solutions, and if the problem persists, referral to the Assistant High Commissioner for Operations for a decision. The SOP has been shared with OIOS.
2	The Division of Emergency, Security and Supply should make a formal request to the United Nations Department of Safety and Security to either provide sufficient capacity to enable all required staff to complete the Safe and Secure Approaches in Field Environments course in a timely manner or to allow UNHCR security professionals to deliver this mandatory classroom based training.	Important				This recommendation has been closed.
3	The Division of Emergency, Security and Supply should periodically analyze the completion of the Security Management	Important	Yes	Head, Field Security Service	28/02/2017	FSS will gather, analyze and share with Bureau Directors statistics on completion of mandatory SMT e-

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> 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**

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Rec.	Recommendation	Critical <sup>1</sup> / Important <sup>2</sup>	Accepted? (Yes/No)	Title of responsible individual	Implementation date	Client comments
	Learning Programme and the Security Management Team e-learning course by Representatives and Heads of Office and regularly circulate statistics and areas of concern related to the completion of these courses to the Directors of Regional Bureaux who should take appropriate follow-up action.					learning and other relevant security training in conjunction with the annual MOSS review.
4	The Division of Human Resources Management should, in coordination with the Division of Emergency, Security and Supply, develop and issue guidelines and instructions to Bureau Directors on the operational circumstances under which security should feature prominently in the work objectives and performance feedback of Representatives and Heads of Office.	Important				This recommendation has been closed.