



INTERNAL AUDIT DIVISION

REPORT 2022/040

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

The Representation delivered on its substantive objectives but needed to enhance services provided to persons of concern in the areas of child protection and security from gender-based violence, health, and self-reliance and livelihoods

26 August 2022

Assignment No. AR2021-131-02

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

EXECUTIVE SUMMARY

The Office of Internal Oversight Services (OIOS) conducted an audit of the operations in Jordan for the Office of the United Nations High Commissioner for Refugees (UNHCR). The objective of the audit was to assess whether the Representation was managing the delivery of services to its persons of concern (PoCs) in a cost-effective and efficient manner. The audit covered the period from 1 January 2020 to 31 August 2021 and included (a) fair protection processes and documentation; (b) security from violence and exploitation; (c) cash-based interventions; (d) health; and (e) community empowerment and livelihoods programmes.

Despite the challenges posed by COVID-19 pandemic, the Representation achieved 81 per cent of performance targets for its substantive objectives. The Representation instituted good controls over cash-based interventions (CBIs) as a modality for service delivery and took quick action to address gaps identified in registration and refugee status determination. It however needed to enhance services provided to PoCs in the areas of child protection and security from gender-based violence (CP/GBV), health and self-reliance and livelihoods.

OIOS made seven recommendations. To address issues identified in the audit, UNHCR needed to:

- Implement targeted prevention programmes against prevalent forms of violence and strengthen national capacity to deliver services to CP/GBV survivors particularly in underserved geographic locations;
- Build partners' capacity to manage cases of sexual and gender-based violence survivors, particularly children, and strengthen its selection and monitoring of partners to ensure more cost-effective programme implementation;
- Align the targeting criteria to the provisions in the cash-based interventions (CBI) exit strategy, explore ways of increasing its capacity to respond to beneficiary complaints, and implement a time-bound action plan to transition cash-based assistance in camps to direct implementation;
- Ensure its health services cover all PoCs and that urban PoCs continue to have access to treatment for non-communicable diseases, and address the long list of PoCs on the referrals waitlist;
- Advocate for Syrian refugees residing in camps to access government health services at the non-insured Jordanian rate; and conduct a comparative advantage to support its decision to purchase or delegate procurement of medicines and supplies to partners;
- Implement a patient management system, maintain accurate referral records and strengthen its oversight over programme activities implemented by partners; and
- Update and implement a livelihoods strategy to ensure increased access to livelihoods by PoCs and advocate for livelihoods policy and framework changes.

UNHCR accepted all recommendations and has initiated action to implement them. Actions required to close the recommendations are indicated in Annex I.

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Audit of the operations in Jordan 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 Jordan for the Office of the United Nations High Commissioner for Refugees (UNHCR).
2. The UNHCR Representation in Jordan (hereinafter referred to as ‘the Representation’) was established in 1990. As of 31 August 2021, UNHCR had 760,040 registered refugees, 83 per cent of whom resided in urban settings and 17 per cent in camps. Eighty-nine per cent of the refugees were from Syria, with the rest coming from Iraq, Yemen, Somalia, Sudan, Ethiopia, and Eritrea.
3. The Representation’s multi-year protection and solutions strategy (MYPSS) for 2020–2021 identified five core protection priorities, namely: (i) strengthening its leadership role in the coordination of the inter-agency response; (ii) advancing the implementation of “one refugee approach”; (iii) increasing access to documentation; (iv) ensuring sustainability through community-based and national protection structures; and (v) sharing responsibilities and finding durable solutions for refugees in Jordan. The Government led the coordination of the inter-agency Syrian Regional Refugee and Resilience Plan (3RP), and this informed the Jordan Response Plan.
4. The Representation in 2020 recorded a total expenditure of \$228 million and \$156 million as of September 2021. It worked with 17 and 19 partners in 2020 and 2021, respectively. In 2020, the total expenditure of partners amounted to \$78 million and accounted for 39 per cent of programme-related expenditures.
5. The Representation was headed by a Representative in an acting capacity at the D-2 level, and it had, at the time of the audit, 385 regular staff posts and 189 affiliate staff. It had a Branch office in Amman, a Sub-Office in Mafraq covering the Mafraq urban areas and Zaatari refugee camp, and Field Offices in Azraq and Irbid.
6. Comments provided by UNHCR are incorporated in italics.

II. AUDIT OBJECTIVE, SCOPE AND METHODOLOGY

7. The objective of the audit was to assess whether the Representation was managing the delivery of services to its persons of concern (PoCs) in a cost-effective and efficient manner.
8. This audit was included in the 2021 risk-based work plan of OIOS due to the risks related to an increasing number of PoCs in a protracted situation.
9. OIOS conducted this audit from October 2021 to March 2022. The audit covered the period from 1 January 2020 to 31 August 2021. Based on an activity-level risk assessment, the audit covered high risk areas, which included: (a) fair protection processes and documentation; (b) security from violence and exploitation; (c) cash-based interventions; (d) health; and (e) community empowerment and livelihoods programmes. In reviewing these areas, the audit also reviewed partnership management and drew overall conclusions on the effectiveness of performance and enterprise risk management in the Representation.

10. The audit methodology included: (a) interviews with key personnel; (b) review of relevant documentation; (c) sample testing of payment vouchers and utilization of data analytics from UNHCR Power BI, the UNHCR business intelligence application; (d) analytical review of data including financial data from Managing for Systems, Resources and People (MSRP), the UNHCR enterprise resource planning system; and performance data from FOCUS, the UNHCR results-based management system, through Global Focus Insight; (e) sample testing of controls using both systematic and random sampling methods; and (f) observation of processes and project activities conducted through direct implementation and those of seven implementing partners.

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

III. AUDIT RESULTS

A. Security from violence and exploitation

Need to strengthen the delivery of child protection and gender-based violence (CP/GBV) related services to affected PoCs

12. The protracted refugee situation and economic hardship in Jordan contributed to different forms of violence and exploitation and increased protection risks among PoCs. This situation was exacerbated by limited livelihoods as well as inadequate specialized psychosocial, legal and security support to affected PoCs. Seventy-seven per cent of reported cases related to psychological abuse and domestic violence and 7.6 and 1.7 per cent arose from sexual assault and rape respectively. The reported cases also included child marriage and labour. The Representation led the Protection Working Group under the refugee coordination model and actively participated alongside the Government in the CP and GBV sub-working groups.

13. The Representation spent \$2.4 million in 2020 and \$2.9 million of its 2021 operating budget on CP/GBV related activities. However, despite a 51 per cent increase in reported GBV incidents in 2021, the Representation only allocated 1.7 per cent of its operating budget to GBV, which was lower than the average Global UNHCR budget allocation of 4.4 per cent. While the Representation prioritized CP/GBV in its multi-year strategy, it did not have a CP/GBV work plan to guide related programme activities until 2021. The 2021 work plan however lacked targets against which the success of planned interventions would be measured. The Representation also had not identified risks that would potentially impede the effectiveness of related interventions as highlighted in the paragraphs below.

14. The Representation conducted 5,497 best interest determinations which guided and supported decision making on the most appropriate actions to take for children at risk. It also provided 1,552 survivors with psychosocial counselling. However, its reach and effectiveness of service delivery to CP/GBV survivors was impacted by: (a) underreporting of cases arising from cultural sensitivities of PoCs and COVID-19 pandemic movement restrictions; (b) the regulatory requirement to report cases to the authorities which compromised case confidentiality; (c) delayed mainstreaming of CP/GBV into related sector work; and (d) limited safe houses for survivors including lesbian, gay, bisexual and transgender refugees.

15. The Representation reached some 17,900 PoCs with prevention activities including information dissemination, outreach, creation of youth committees and women empowerment activities. While these prevention activities increased the number of survivors seeking assistance, they did not impact PoCs' attitudes and cultural norms on GBV. For instance, the reported number of GBV incidents increased by 51 per cent in 2021 when compared to 2020. The number of child marriages also remained high e.g., they

constituted 60 per cent of all marriages in Zaatari camp and those in Azraq camp increased from 103 to 150 in 2020. The Representation had drafted but was yet to operationalize a strategy for preventing child marriages in Zaatari camp through behavioural change including engaging men in accountable practices.

16. The Representation was only able to provide services remotely during the COVID-19 pandemic and this affected survivors' access to health, legal, psychosocial and security services especially in urban areas. The Representation adopted a hybrid approach (remote and in-person) to service delivery once the COVID-19 restrictions were relaxed and partners could access camp-based PoCs. However, some inconsistencies remained in service delivery including survivors in Zaatari not having safe spaces. Also, in Amman and south Jordan where the majority and most vulnerable PoCs resided (mostly non-Syrians), the Representation did not have adequate staff capacity to provide services. After the audit fieldwork, the Representation increased the staff allocated to the CP/GBV Unit.

17. Further, 81 and 42 per cent of SGBV survivors had no access to livelihoods opportunities and cash assistance services respectively. To address this, the Representation: (a) prioritized cash assistance for GBV survivors in urban areas and Zaatari camp; (b) developed an application to help staff and survivors locate services in their geographical areas; and (c) started tracking survivors' access to services. However, survivors in Azraq camps were still unable to access the cash assistance project and the online application was unable to provide the number of PoCs that had access to services.

18. Delays in Government's approval of the four partners implementing CP/GBV activities affected the timeliness of service delivery to survivors. Further, an international partner implementing the CP/GBV programme in Mafraq and Zaatari faced frequent staff changes, which in the absence of continuous training, affected not only the quality services provided to survivors but their ability to report as required. For instance, this partner recommended that children affected by GBV are sent to detention centres and this was not in the children's best interest. Their costs were \$565 per intervention which was much higher than those of a national partner that charged \$167 for related services. In line with its overall strategy to build national capacity, the Representation should explore options to engage and expand partnerships with local partners which may be more cost-effective.

19. The Representation attributed the issues above, which resulted in significant gaps in reaching survivors of SGBV with quality services, to inadequate national capacity to support the CP/GBV programmes. However, 1,620 partners and Government staff had received training on CP/GBV, which raised questions on the effectiveness of these training efforts. The Representation noted its plans to address the identified gaps through the inter-agency sector working groups.

(1) The UNHCR Representation in Jordan should, in coordination with inter-agency partners, reinforce the strategic planning of child protection and gender-based violence (CP/GBV) programme by: (i) implementing targeted prevention activities against the prevalent forms of violence; (ii) strengthening national system capacity to deliver services especially in underserved geographic locations; and (iii) defining indicators and targets against which the success of implemented interventions will be measured.

UNHCR accepted recommendation 1 and stated that (i) UNHCR continued implementing targeted prevention activities; (ii) UNHCR was working with national partners to develop practical survivor-centred guidelines for governmental entities working with survivors, a training would be provided upon the finalization of the guidelines and this should also address access to other Government managed facilities and services; and (iii) the 2023-2025 multi-year strategy is finalized with respective targets and indicators to assess the implementation progress. UNHCR Child Protection and GBV strategies will be updated to build on and strengthen existing national strategies.

- (2) The UNHCR Representation in Jordan should: (i) build partners' case management capacity to identify and respond appropriately to sexual and gender-based violence survivors, particularly children; and (ii) strengthen its selection and monitoring of partners to ensure more cost-effective programme implementation.**

UNHCR accepted recommendation 2 and stated that (i) the global GBV IMS team facilitated a training of trainers for UNHCR and its partners on GBV case management this year, and the national GBV SWG was finalizing its interagency GBV action plan that includes capacity building on case management; and (ii) UNHCR was in the process of selecting partners for the implementation of 2023-2025 multi-year strategy and would further include considerations regarding cost-effectiveness and nationalization. UNHCR's partner monitoring included review of monthly monitoring reports from partners, quarterly monitoring visits by MFT and by the Protection team.

B. Cash-based interventions

Need to strengthen controls over cash-based interventions as a service delivery modality

20. The Representation through the CBI programme provided multi-purpose, winter, COVID-19, education, and essential health services cash assistance to vulnerable PoCs. In 2020, the CBI expenditure amounted to \$114 million, a 14 per cent increase from the previous year, and the budget for 2021 was \$91 million. The increase was due to one-off cash assistance provided to 53,000 beneficiary households during the COVID-19 pandemic. The Representation directly implemented CBI through two financial service providers for out-of-camp refugees and through a partner for all camp-based refugees. An evaluation of the CBI programme in 2017 concluded that its coverage was inadequate as it did not include camp-based refugees. To address this, the Representation initiated a gradual shift and by 2021 all non-food items in the camps had been monetized and cash assistance was distributed through a partner.

21. The Representation met its targets of providing cash assistance to 30,000 Syrian and 3,000 non-Syrian refugee households. It however was unable to reach all eligible beneficiaries and thus had 11,500 PoCs on a waitlist due to limited funding available at the time of the audit. The Representation was unable to provide the ageing of PoCs on the waitlist. Further, the Representation had 3,393 ineligible PoCs who continued to receive assistance, due to procedural delays in their deactivation. As a result, ineligible persons had access to CBI at the expense of those that were vulnerable.

22. The Representation did not have defined maximum time frames for beneficiaries to receive monthly multiple purpose cash assistance. Thus, beneficiaries were receiving cash assistance for long periods of time with no exit strategy in place at the time of the audit. This created a long-term dependency on assistance with 17, 37 and 9 per cent of the beneficiaries receiving continuous assistance for 3-4, 4-7 and 7-10 years respectively. The Representation planned to transition to the Vulnerability Assessment Framework¹ by 2022 which included the gradual phase-out of assistance by narrowing the targeting criteria and handing affected PoCs over to national systems, local safety nets or other humanitarian partners.

23. The Representation migrated to the CashAssist² system in 2020, which was used to generate cash distribution lists. The Representation was in the process of integrating CashAssist to the systems of

¹ VAF consists of 65 indicators developed and validated by interagency sector coordination working group members. These scores indicate vulnerability in six sectors, defining low, medium, high or severely vulnerable. The eligibility under the VAF would be informed by data collected through home visits and protection vulnerabilities captured in proGres.

² CashAssist is UNHCR's cash assistance management system to ensure an effective and integrated delivery of cash assistance to identified PoCs.

Financial Service Providers and in the meantime conducted manual reconciliations to address the risk of errors. OIOS interviewed 18 sampled PoCs, who expressed satisfaction with the distribution mechanisms but expressed concerns about delays in responding to complaints raised through the call centre. The call centre had only two general service staff that in October 2021 alone responded to 89,398 calls from 28,462 beneficiaries on various matters. This resulted in delays in effecting cash payments with 397 beneficiaries receiving retroactive payments for up to 3 months in the last quarter of 2021. The Representation needed to explore options for increasing its capacity to field and respond to beneficiary queries.

24. The Representation's plans to transition to direct implementation in 2020 were affected by the lack of automated teller machines in camps and pending Government authorizations. Therefore, the Representation continued to incur annual support costs amounting to \$1.2 million for all cash assistance implemented through partners. Furthermore, the June 2021 beneficiary lists for the Zaatari camp had 877 no-show cases, 605 of whom were since October 2020. The Representation had not updated its distribution lists and blocked such cases so as to mitigate risk of fraud.

25. Overall, the Representation implemented adequate controls over the delivery of its CBI and had prioritized further improvements such as increasing the use of mobile wallets and revising the VAF survey for all PoCs. By belonging to the common cash facility used by United Nations agencies and Non-Governmental Organizations, the Representation was able to mitigate the risk of duplication of assistance. It also conducted post-distribution monitoring for CBI assistance delivered. However, some weaknesses in the programme remained which if unaddressed would affect the cost-effectiveness with which the cash assistance was provided to PoCs.

(3) The UNHCR Representation in Jordan should strengthen its use of cash-based interventions (CBI) as a service delivery modality by: (i) aligning the targeting criteria to the provisions in the financial inclusion strategy; (ii) exploring ways of increasing its capacity to respond to beneficiary complaints; (iii) implementing a time-bound action plan to transition cash based assistance in camps to direct implementation; and (iv) strengthening its guidance on the exclusion of the ineligible and no-show cases from cash assistance.

UNHCR accepted recommendation 3 and stated that (i) UNHCR Jordan planned to fully implement the roll-out of the new targeting criteria by the end of the third quarter of 2023, (ii) UNHCR was in the process of improving its capacity to respond to beneficiary complaints; (iii) UNHCR had achieved a transfer to direct implementation via digital payments for some 93 per cent of the camps' beneficiaries, the remaining 7 per cent were the cases with special needs and thus would remain as a separate category of beneficiaries to be managed either by direct implementation or by a partner; and (iv) UNHCR strengthened its guidance on the exclusion of ineligible and no-show cases from camp cash assistance by the mobile wallet onboarding process which required iris authentication.

C. Health

Need to further strengthen the delivery of health services to PoCs

26. The Representation prioritized the progressive integration of refugees into the national health care system in its MYPSS. It spent \$50 million on health activities in the period under audit. Over 80 per cent of the funds were spent on partner personnel costs, the purchase of medicines and medical supplies and payment of cash assistance to PoCs. The Representation successfully implemented a cash assistance programme for health services for urban PoCs.

27. The Representation in cooperation with the Government and other operating partners developed a draft health sector humanitarian response strategy (2020-2021). Although the strategy was based on an assessment of Jordan's health situation, it: (i) still prioritised service delivery through parallel systems instead of mainstreaming PoCs into national ones as stipulated in the Representation's MYPSS; (ii) only covered Syrian refugees and thus excluded 15 per cent of PoCs; (iii) did not have plans to support its operationalization and thus expired before it was implemented; and (iv) lacked indicators and targets against which its success would be measured. The Representation needed to update the strategy to address the gaps identified above.

28. At the time of the audit, the Government was integrating urban refugees into the national health care systems, so they received cash assistance as opposed to getting services from clinics run by partners. However, the cash received was inadequate to cover PoCs' treatment of non-communicable diseases. This implied that about 5,000 urban PoCs would go without such treatment once their access to partner run clinics was stopped. Further, the multi-donor account that was funding the health insurance for urban refugees was set to close in 2024, with no guarantee of extension due to donor fatigue and the lack of data on supported refugees. The Representation needed to consider other alternative funding sources e.g., the national health insurance schemes for the most vulnerable Jordanians.

29. The audit also noted that the Representation's 2021 costs for running clinics for camp-based Syrians (comprising 17 per cent of total PoC numbers) were \$7.9 million and this was much higher than the cash payments in the same period made to urban refugees (83 per cent of the PoC population) that amounted to \$259,483. This implied that considerable cost savings would be achieved if camp-based refugees were also mainstreamed into national systems.

30. The Representation managed 56 per cent of all referrals (those above 750 Jordanian Dinars threshold), with the rest handled through partners. Its medical audits of invoices resulted in savings worth \$1.65 million (25 per cent of the amounts invoiced) in 2020. However, the Representation relied on one partner's referral database, which did not have accurate data. For instance, the database did not contain the 3,805 PoCs on the referral waitlist and included two Jordanian citizens whose costs should not have been met by the Representation. The referral numbers and expenditures contained in the database could not be reconciled to the monthly summary sheets prepared by the Representation's health unit. Further, it did not always have key information on referred cases such as: (i) mission and discharge dates and names of treatment facilities; and (ii) cost estimates and final audited invoice amounts.

31. The Representation also did not have an electronic patient management system. It relied on the national health information system for data; however, this system did not disaggregate refugee data from that of Jordanians. At the time of the audit, the Representation was exploring options for implementing an electronic patient management system that also collected health data for reporting.

32. The Representation delegated the procurement of medicines to a partner. At the time of the audit, the Representation was considering in-housing the procurement of medicines, construction, and shelter materials because of the Government's plans to introduce value-added tax charges on procurements executed by partners. A comparative advantage assessment to support its decision on whether to procure directly or continue delegating the procurement of medicines to partners showed that the former was more cost-effective with estimated savings on taxes of \$373,000. The Representation also needed to undertake a similar comparative analysis relating to construction and shelter material procurement.

33. The absence of a comprehensive strategy and the inadequate monitoring of the implementation of programmes by partners meant that there were gaps in the delivery of health services to PoCs as well as missed opportunities to find cost-effective and sustainable health solutions.

- (4) The UNHCR Representation in Jordan should reinforce its strategic planning processes to increase the coverage and quality of health services by: (i) ensuring it covers all persons of concern; (ii) addressing the long list of persons of concern on the referrals waitlist; and (iii) ensuring that urban persons of concern have access to treatment for non-communicable diseases.**

UNHCR accepted recommendation 4 and stated that (i) UNHCR would further pursue an interagency humanitarian approach and response strategy that focuses on integrating and including all refugees including non-Syrians; (ii) UNHCR would maintain its coordination with other operational partners to ensure coverage of medical referrals waitlist; and (iii) the recently developed service guide aimed, among other things, at improving information for urban refugees on how to access non-communicable diseases (NCDs) treatment at the public health centers of the Ministry of Health. UNHCR would also explore an option for establishing cash for health for NCDs, subject to availability of funding.

- (5) The UNHCR Representation in Jordan should review the cost-effectiveness of its delivery of services including but not limited to: (i) advocating for Syrian refugees residing in camps to access government health services at the non-insured Jordanian rate; and (ii) conducting a comparative analysis to support its decision to purchase or delegate procurement of medicines and supplies to partners.**

UNHCR accepted recommendation 5 and stated that (i) the recently developed health policy manual on refugees' access to health care by the MOH was facilitating the inclusion of all refugees in the national health system without any distinctions between camp or non-camp residents; and (ii) UNHCR planned to launch a tender for direct procurement of medicines that would provide real time information about the process, involved costs and resources in order to make an informed decision whether direct procurement is of comparative advantage over delegating to a partner.

- (6) The UNHCR Representation in Jordan should strengthen its delivery of services by: (i) implementing a patient management system that feeds data into the health information system for decision making; (ii) maintaining accurate referral records; (iii) advocating for an extension of the multi-donor account to cover health costs for urban refugees post 2024; and (iv) strengthening its oversight over programme activities implemented by partners.**

UNHCR accepted recommendation 6 and stated that (i) UNHCR and its partners would develop and finalize its monitoring and evaluation framework to ensure the data quality of Continued Care Records (CCR – refers to the system of patients' referrals); (ii) UNHCR and partners would maintain accurate referral records through the functioning of CCR; (iii) UNHCR continued its advocacy for the continuation of the Multi-Donor Account (MDA) through regular technical meetings of the MDA Task Force and the Jordan Health Development Partners Forum; and (iv) UNHCR regularly conducted field site visits using the balance scores, MFT visits, partners reports and Health Information System.

D. Fair protection process and documentation

Action was taken to address identified gaps in registration, refugee status determination and documentation

34. The Representation spent \$6.3 million in 2020 on continuous registration activities and renewal of documents, with 87 per cent of the expenditure spent on affiliate workforce costs. Despite the Representation's renewal of documentation for 51,186 cases (comprising 199,218 individuals of multiple nationalities) in 2020, some 117,500 cases remained at the end of 2020. The backlogs created protection risks since some institutions did not accept expired documents even after the Government stated that they

remained valid until the end of 2021. The Representation recruited and trained 25 additional caseworkers who by the end of 2021 had renewed 398,306 asylum seeker certificates and addressed the backlog.

35. The Representation attributed the challenges that PoCs faced in accessing civil status documentation to policy restrictions. For example, parents without marriage certificates were unable to register their children's births since formal proof of marriage was a requirement for such processes. Children without birth certificates were also frequently denied Ministry of Interior service cards. Courts that addressed these matters were only open 2-3 days a week in the camps despite the increased demand for services. Within these limitations, the Representation was still able to support 20,533 of the 27,747 targeted Syrian refugees and asylum seekers to obtain birth certificates.

36. To address these issues, the Representation took action by advocating for the harmonization of the issuance of asylum and identity documents for all PoCs as well as extensions to the number of days courts were open. It also entered into concerted advocacy with the authorities to align the continuous registration cycle across urban and camp population to an annual cycle and update the content and layout of UNHCR issued documents. Consequently, the Supreme Judge Department extended Sharia courts' working days in Zaatari camp to four days in a week. The Representation was also implementing action plans to support the implementation of its updated refugee status determination strategy.

E. Community empowerment, self-reliance, and livelihoods

Need to scale up livelihoods programmes to ensure social protection

37. The Representation implemented self-reliance and livelihoods programmes worth \$3.8 million and \$3.6 million in 2020 and 2021 respectively. However, their effectiveness was impacted by the socio-economic impact of the pandemic, which led to many PoCs losing their livelihoods in the period under audit. It also impacted the Representation's implementation of, and PoCs' access to, livelihoods opportunities. The Representation also spent \$8.1 and \$7.7 million in 2020 and 2021 respectively on community empowerment projects targeting host and displaced communities with the aim of creating a peaceful co-existence between them. The Representation was able to support 40 and 35 community groups in 2020 and 2021 respectively against the annual targets of 43.

38. The Representation worked alongside the United Nations Inter-Agency Task Force to help Syrian refugees access livelihoods interventions in urban areas and camps settings. Syrian refugees were thus able to access legal work in three of the seven sectors agreed upon in the Jordan Compact. The Representation also facilitated the issuance of 38,756 work permits to Syrian refugees (against a target of 70,000) and registered 32 additional home-based businesses for Syrian refugees. However, the issuance of work permits did not necessarily result in PoCs gaining employment and thus they continued to look for opportunities in the informal sectors and at limited wages. The audit noted from focus group discussions and interviews with the refugees that there was a general perception that humanitarian actors favoured Syrians in the provision of assistance, and communities were not sufficiently engaged in the programmes. The Representation stated that it was committed to strengthening community self-management structures and planned to evaluate the effectiveness of the interventions in creating the desired change among PoCs.

39. The Representation also provided PoCs with cash so they would start short term income-generating activities. This in 2020 alone created short-term work opportunities for over 16,000 beneficiaries. However, the size of unmet needs far exceeded the level of individual interventions, with the Representation reaching only 7 per cent of the total number of PoCs with this assistance. The Representation also primarily supported short term interventions; consideration needed to be given to more

long-term projects. The audit identified over 50 duplications where more than one family member received cash assistance. This reflected gaps in the Representation's oversight over the cash assistance project.

40. The Representation needed to update its livelihoods strategy to not only address identified gaps in implementation but also ensure that interventions created the desired impact among PoCs. The updated strategy also needed to be informed by the planned evaluations strategy and be aligned to the guidelines in UNHCR's Refugee Livelihoods and Economic Inclusion 2019-2023 Global Strategy Concept Note.

(7) The UNHCR Representation in Jordan should: (i) update and implement a livelihoods strategy that is aligned with UNHCR organizational-wide direction to ensure increased access to livelihoods by persons of concern; and (ii) advocate for policy and framework changes within the country to support an increase in available employment opportunities.

UNHCR accepted recommendation 7 and stated that (i) with the new strategical approach, which the operation laid down in the multi-year strategy for 2023 to 2025, UNHCR Jordan aimed at updating and finalizing its draft livelihood strategy as a standalone in an inclusive and consultative approach; and (ii) UNHCR Jordan continuously engaged in discussions on employment opportunities and the related legal framework with external stakeholders. UNHCR Jordan would further provide a report on its continued advocacy with donors and the Government for more openings for refugees as a part of the year end reporting.

IV. ACKNOWLEDGEMENT

41. 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) Anne Rwego
Chief, UNHCR Audit Service
Internal Audit Division
Office of Internal Oversight Services

STATUS OF AUDIT RECOMMENDATIONS

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

Rec. no.	Recommendation	Critical ³ / Important ⁴	C/ O ⁵	Actions needed to close recommendation	Implementation date ⁶
1	The UNHCR Representation in Jordan should in coordination with inter-agency partners reinforce the strategic planning of child protection and gender-based violence (CP/GBV) programme by: (i) implementing targeted prevention activities against the prevalent forms of violence; (ii) strengthening national system capacity to deliver services especially in underserved geographic locations; and (iii) defining indicators and targets against which the success of implemented interventions will be measured.	Important	O	Receipt of a revised CP/GBV strategy that enhances prevention, promotes survivor identification, targets underserved locations and has a performance framework against which the success of the programme would be measured.	31 March 2023
2	The UNHCR Representation in Jordan should: (i) build partners' case management capacity to identify and respond appropriately to sexual and gender-based violence survivors, particularly children; and (ii) strengthen its selection and monitoring of partners to ensure more cost-effective programme implementation.	Important	O	Receipt of: (i) evidence on strengthening partners' management of cases of survivors; and (ii) evidence of the measures taken to ensure cost-effective programme implementation.	31 March 2023
3	The UNHCR Representation in Jordan should strengthen its use of cash-based interventions (CBI) as a service delivery modality by: (i) aligning the targeting criteria to the provisions in the exit strategy; (ii) exploring ways of increasing its capacity to respond to beneficiary complaints; (iii) implementing a time-bound action plan to transition cash based assistance in camps to direct	Important	O	Receipt of: (i) the revised targeting criteria; (ii) evidence of how beneficiary complaints were managed; (iii) evidence that CBI in camps was transitioned to direct implementation; and (iv) updated guidance on exclusion of the ineligible and no-show cases from cash assistance.	30 September 2023

³ 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.

⁴ 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.

⁵ Please note the value C denotes closed recommendations whereas O refers to open recommendations.

⁶ Date provided by UNHCR in response to recommendations.

STATUS OF AUDIT RECOMMENDATIONS

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

	implementation; and (iv) strengthening its guidance on the exclusion of the ineligible and no-show cases from cash assistance.				
4	The UNHCR Representation in Jordan should reinforce its strategic planning processes to increase the coverage and quality of health services by: (i) ensuring it covers all persons of concern; (ii) addressing the long list of persons of concern on the referrals waitlist; and (iii) ensuring that urban persons of concern have access to treatment for non-communicable diseases.	Important	O	Receipt of the revised health sector response strategy addressing the gaps identified.	30 June 2023
5	The UNHCR Representation in Jordan should review the cost-effectiveness of its delivery of services including but not limited to: (i) advocating for Syrian refugees residing in camps to access government health services at the non-insured Jordanian rate; and (ii) conducting a comparative analysis to support its decision to purchase or delegate procurement of medicines and supplies to partners.	Important	O	Receipt of evidence of: (i) inclusion of camp residents within the new access policy at non-insured Jordanian rate; and (ii) results of the comparative analysis to inform its decision on whether to delegate procurement to partners.	30 June 2023
6	The UNHCR Representation in Jordan should strengthen its delivery of services by: (i) implementing a patient management system that feeds data into the health information system for decision making; (ii) maintaining accurate referral records; (iii) advocating for an extension of the multi-donor account to cover health costs for urban refugees post 2024; and (iv) strengthening its oversight over programme activities implemented by partners.	Important	O	Receipt of evidence of: (i) implemented patient management system, with accurate referral records; (ii) monitoring framework implemented for partners; and (iii) advocacy efforts for continuation of the multi-donor account beyond 2024	30 June 2023
7	The UNHCR Representation in Jordan should: (i) update and implement a livelihoods strategy that is aligned with UNHCR organizational-wide direction to ensure increased access to livelihoods by persons of concern; and (ii) advocate for policy and	Important	O	Receipt of: (i) updated livelihoods strategy; and (ii) evidence of the advocacy efforts made for livelihoods policy and framework changes.	31 March 2023

STATUS OF AUDIT RECOMMENDATIONS

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

	framework changes within the country to support an increase in available employment opportunities.				
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APPENDIX I

Management Response

Management Response

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

Rec. no.	Recommendation	Critical ⁷ / Important ⁸	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
1	The UNHCR Representation in Jordan should in coordination with inter-agency partners reinforce the strategic planning of child protection and gender-based violence (CP/GBV) programme by: (i) implementing targeted prevention activities against the prevalent forms of violence; (ii) strengthening national system capacity to deliver services especially in underserved geographic locations; and (iii) defining indicators and targets against which the success of implemented interventions will be measured.	Important	Yes	Senior Protection Officer.	First quarter 2023 (implementation initiated in 2022, on-going)	<p>(i) UNHCR continues implementing targeted prevention activities, such as: conducting EMAP (Engaging men through accountable practice) training for UNHCR and national partners staff; supporting 'Girls Shine' project, a tailored programme for adolescent girls; having developed and endorsed the interagency Child Marriage prevention strategy for Zaatari Camp; supporting in the role of member of the National Child Labor steering committee development of the national child labor strategy; about to finalize awareness raising materials about type of GBV and available services.</p> <p>(ii) Considerations for 2023 detailed planning include underserved locations with due account to resources implications. Furthermore, a Call of Expression of Interest to manage partnership selection includes the point of under-served locations.</p>

⁷ 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.

⁸ 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 ⁷ / Important ⁸	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>UNHCR is working with national partners to develop practical survivor-centered guidelines for governmental entities working with survivors; a training will be provided upon the finalization of the guidelines. This should also address access to other Government managed facilities and services. An outreach plan has been initiated to cover the South region focusing on Child Protection and GBV with round one assessment of existing actors capacities, planned round two will include capacity building and establishing operational linkages. The Amaali application – the GBV application which provides country wide electronic GBV referral pathway - will be upgraded to incorporate chat functionality for GBV survivors to be counselled on available services.</p> <p>(iii) The 2023-2025 multi-year strategy is finalized with respective targets and indicators to assess the implementation progress. UNHCR Child Protection and GBV strategies will be updated to build on and to strengthen existing national strategies.</p>
2	The UNHCR Representation in Jordan should: (i) build partners' case management capacity to identify and respond appropriately to sexual and gender-based violence survivors, particularly children; and (ii) strengthen its selection and	Important	Yes	Senior Protection Officer.	First quarter 2023 (implementation initiated, on-going)	(i) The global GBV IMS team facilitated a training of trainers for UNHCR and its partners on GBV case management this year. The national GBV SWG is finalizing its interagency GBV capacity building

Rec. no.	Recommendation	Critical ⁷ / Important ⁸	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
	monitoring of partners to ensure more cost-effective programme implementation.					<p>action plan that includes capacity building on case management. UNHCR continues conducting bi-monthly coaching to improve case management of Child Protection and GBV cases for its Child Protection partners' staff in Zaatari Camp and Mafraq locations. UNHCR and UNFPA agreed to co-facilitate bi-monthly coaching sessions to enhance the quality of GBV Case management for the GBV partner in Zaatari Camp.</p> <p>(ii) UNHCR is in the process of its partnership selection for 2023-2025 multi-year strategy. It will further include considerations regarding cost -effectiveness and nationalization. UNHCR monitoring includes review of monthly monitoring reports from partners, quarterly monitoring visits by MFT and by the Protection team.</p>
3	The UNHCR Representation in Jordan should strengthen its use of cash-based interventions (CBI) as a service delivery modality by: (i) aligning the targeting criteria to the provisions in the financial inclusion strategy; (ii) exploring ways of increasing its capacity to respond to beneficiary complaints; (iii) implementing a time-bound action plan to transition cash based assistance in camps to direct implementation; and (iv) strengthening its guidance on the exclusion of the ineligible and no-show cases from cash assistance.	Important	Yes	Sr. Programme CBI Officer	Third quarter 2023 (implementation on-going)	<p>(i) UNHCR Jordan plans to fully implement the roll-out of the new targeting criteria by the end of the third quarter of 2023.</p> <p>(ii) UNHCR is in the process of improving its capacity to respond to beneficiary complaints (e.g., opening in-person counselling and Helpdesks at reception centres, expansion of the capacity for in-bound calls for the HelpLine, updating the Interactive Voice</p>

Rec. no.	Recommendation	Critical ⁷ / Important ⁸	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						<p>Response (IVR) tree of the telephone system of the Helpline.</p> <p>(iii) UNHCR had achieved a transfer to direct implementation via digital payments for some 93% of the camps' beneficiaries, through mobile wallet onboarding and usage as a cash assistance delivery modality by UNHCR. The remaining 7% are the cases with special needs (e.g., persons without valid identity documents, illiterate without family support) and thus will remain as a separate category of beneficiaries to be managed either by direct implementation or by a partner.</p> <p>(iv) UNHCR strengthened its guidance on the exclusion of ineligible and no-show cases from camp cash assistance by the mobile wallet onboarding process which required iris authentication (thus verifying presence) and running eligibility checks of beneficiaries based on the latest refugees' registration records.</p>
4	The UNHCR Representation in Jordan should reinforce its strategic planning processes to increase the coverage and quality of health services by: (i) ensuring it covers all persons of concern; (ii) addressing the long list of persons of concern on the referrals waitlist; and (iii) ensuring that urban persons of concern have	Important	Yes	Senior Public Health Officer	Second quarter 2023 (implementation ongoing)	<p>(i) UNHCR will further pursue an interagency humanitarian approach and response strategy that focuses on the integration and inclusion of all refugees including non-Syrians.</p> <p>(ii) UNHCR will maintain its coordination with other operational</p>

Rec. no.	Recommendation	Critical ⁷ / Important ⁸	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
	access to treatment for non-communicable diseases.					partners to ensure coverage of medical referrals waitlist. The policy manual and service guide recently developed by the Ministry of Health and UNHCR (on access to services) will facilitate refugees' access to public facilities. The recently developed service guide aims among other at improving information for urban refugees on how to access non-communicable diseases (NCDs) treatment at the public health centers of the Ministry of Health. UNHCR will explore an option for establishing cash for health for NCDs, subject to availability of funding.
5	The UNHCR Representation in Jordan should review the cost-effectiveness of its delivery of services including but not limited to: (i) advocating for Syrian refugees residing in camps to access government health services at the non-insured Jordanian rate; and (ii) conducting a comparative analysis to support its decision to purchase or delegate procurement of medicines and supplies to partners.	Important	Yes	Senior Public Health Officer	Second quarter 2023 (implementation ongoing)	<p>(i) The recently developed health policy manual on refugees' access to health care by the MOH is facilitating the inclusion of all refugees in national health system without any distinctions to camp or non-camp residents. Syrian refugees residing in camps have been granted access to public facilities at the non-insured Jordanian rate – as a part of the manual.</p> <p>(ii) UNHCR plans to launch a tender for direct procurement of medicines that will provide real time information about the process, involved costs and resources in order to make an informed decision whether direct procurement is of</p>

Rec. no.	Recommendation	Critical ⁷ / Important ⁸	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
						comparative advantage over delegating to a partner.
6	The UNHCR Representation in Jordan should strengthen its delivery of services by: (i) implementing a patient management system that feeds data into the health information system for decision making; (ii) maintaining accurate referral records; (iii) advocating for an extension of the multi-donor account to cover health costs for urban refugees post 2024; and (iv) strengthening its oversight over programme activities implemented by partners.	Important	Yes	Senior Public Health Officer	Second quarter 2023 (implementation on-going)	<p>(i) UNHCR and its partners will develop and finalize its monitoring & evaluation framework to ensure data quality of Continued Care Records (CCR – refers to the system of patients’ referral).</p> <p>(ii) UNHCR and partners will maintain accurate referral records through the functioning of this system, Continued Care Records. This system will allow accuracy of the data as it serves the purpose of the platform to manage the referrals.</p> <p>(iii) UNHCR continues its advocacy for the continuation of the Multi-Donor Account (MDA) through regular technical meetings of the MDA Task Force and the Jordan Health Development Partners Forum (continuous). This subject is a part of the Jordan Compact and UNHCR will remain a key stakeholder to influence any further policy decisions.</p> <p>(iv) UNHCR regularly conducts field site visits using the balance scores, MFT visits, partners reports and Health Information System.</p>
7	The UNHCR Representation in Jordan should: (i) update and implement a livelihoods strategy that is aligned with UNHCR organizational-wide direction to	Important	Yes	Associate Livelihoods and Economic	First quarter 2023	(i) With the new strategical approach, which the operation laid down in the multi-year strategy for 2023 to 2025, UNHCR Jordan aims

Rec. no.	Recommendation	Critical ⁷ / Important ⁸	Accepted? (Yes/No)	Title of responsible individual	Implementation date	UNHCR comments
	ensure increased access to livelihoods by persons of concern; and (ii) advocate for policy and framework changes within the country to support an increase in available employment opportunities.			Inclusion Officer		<p>at updating and finalizing its draft livelihood strategy as standalone in an inclusive and consultative approach.</p> <p>(ii) UNHCR Jordan continuously engages on discussions on employment opportunities and the related legal framework with external stakeholders. UNHCR Jordan will further provide a report on its continued advocacy with donors and the Government for more openings for refugees as a part of the year end reporting.</p>