INVESTING IN INTEGRITY:

UNHCR'S ORGANIZATIONAL COMMITMENT TO PREVENT, MITIGATE AND RESPOND TO SEXUAL EXPLOITATION & ABUSE, SEXUAL HARASSMENT, FRAUD, CORRUPTION, AND OTHER FORMS OF MISCONDUCT

2018-2019

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Overview

All UNHCR stakeholders – including the people we serve, partner agencies, UNHCR personnel, and host and donor governments - rightly have high expectations for strong systems to prevent, mitigate, respond and learn lessons on all forms of misconduct, fraud, corruption, sexual exploitation and abuse (SEA), and sexual harassment (SH). UNHCR acknowledges that many of our operations are in high-risk environments, physically and due to the nature of our work, and we remain deeply committed to ensuring the integrity of all our activities. The High Commissioner has repeatedly stressed that there is no place for fraud, corruption, SEA or SH at UNHCR, an organization that is dedicated to serving and protecting others. Following a review of oversight functions in 2016, UNHCR has taken steps to ensure a greater degree of coherence and complementarity across the Agency, facilitated by the ongoing Change Management process.

UNHCR has made investing integrity an institutional priority, progressively adopting more measures with regards to prevention, training, awareness-raising, effective investigation, survivor and whistle-blower protection, and robust action against perpetrators. These mitigation and response measures broadly relate to several key areas which include: **risk management, investigation and enforcement**; **systems and tools**; **cultural change and capacity building**; **support to staff**, and **coordination and frameworks**.

This document outlines these, and the many other mutually-reinforcing activities being undertaken by UNHCR across our various divisions and services, contributing in a coordinated manner to the organization-wide objective of strengthened integrity, accountability and transparency in UNHCR's field and HQ operations.

Risk Management, Investigations and Enforcement

UNHCR's zero tolerance policy means that every possible report or allegation of fraud, corruption, sexual exploitation, abuse or harassment by UNHCR or partner personnel is thoroughly assessed and if substantiated leads to sanctions, including summary dismissal. A robust set of policies and related guidance has been developed and refined over the years to support effective implementation of this process, overseen by a well-established, multi-functional safeguarding team with a global remit.

UNHCR has undertaken an ambitious, proactive new approach to managing risk, preventing fraud and corruption, and improving programme delivery - **'Risk Management 2.0'**. The initiative is designed to ensure that strategic planning and decision-making are consistently informed by operational and management risks, with an emphasis on proactively identifying and preventing potential fraud, corruption and exploitation. Risk Management 2.0 reinforces risk-aware management across the organization as well as supporting key operations by embedding senior Risk Management and Compliance Advisors in the field. Lessons learnt from these processes will guide the improvement of UNHCR`s Enterprise Risk Management (ERM) framework and reporting tools, guidance and training materials.

With a quarter of new investigations opened by UNHCR's **Inspector General's Office (IGO)** in the last 12 months relating to complex and resource intensive SEA/SH cases, the IGO has been strengthened and professionalised with four additional positions with more specialized personnel to deal with these and other cases. Most of the positions are expert positions filled by investigators with police or UN investigator backgrounds and will be regionalized in Geneva, Bangkok, Nairobi and Pretoria, with strategic oversight being strengthened and made more coherent organization-wide. A new investigation training position is also planned to develop training materials and roll-out field and HQ trainings. This position would manage the portfolio of learning programmes, undertake training needs assessments and develop content, e-learning and other training materials. It would conduct training missions that are expected to change behaviour through improved awareness of the impact of fraud, corruption, abuse of authority and position, SEA, and SH, as well as by raising awareness on expected conduct and obligations to report to the IGO.

Staff resources in the **Legal Affairs Service (LAS)** have been bolstered to ensure that cases of SEA/SH are dealt with within the targeted timeframe of 3-4 months and that attention to and resources for other cases is maintained. Presently LAS has seven lawyers and two administrative assistants devoted 100 per cent to integrity issues arising from SEA, SH, fraud and corruption. In 2019, this is planned to be further enhanced with an additional Senior Legal Officer to strengthen UNHCR's systematic response to misconduct committed by UNHCR partners, as well as with resources for engaging external counsel which is sometimes necessary for this highly specialized area of courtroom litigation. Meanwhile, training for LAS personnel who handle SEA and other cases of ethical conduct is also planned, enhancing their litigation and advocacy skills to ensure UNHCR can take and defend robust action against SEA/SH and other misconduct.

Ensuring senior level engagement on SEA/SH is key to ensure that there is full buy-in across the agency, particularly in emergencies or large operations where there is often little time to stop and reflect on these issues. UNHCR has therefore developed the concept of **Senior Intervention Teams (SIT)** which are designed as targeted, formalized support to specific operations in which the organization detects that UN and UNHCR values are being undermined through inappropriate behaviours by more than one individual and negative patterns might be emerging. The first missions to the field will be undertaken in the second half of 2018, to proactively engage with colleagues on issues of SEA/SH, open the space for dialogue, and address emerging issues and concerns. SITs are a complementary tool connected to UNHCR's "Risk Management 2.0" initiative and constitute targeted HQ senior level support to reinforce ethical conduct, values and culture in the organization.

Further complementing these activities, specifically on fraud by persons of concern, is a system of **multi-functional integrity support missions** through which field operations receive HQ support to assess the operations' vulnerabilities, protection gaps and procedural inadequacies that create possibilities for fraud by persons of concern. The missions likewise consider operations' existing feedback, response, and complaints mechanisms and their accessibility for persons of concern, and provide advice with a view to strengthening overall performance and accountability to persons of concern.

UNHCR is one of the founding members of the **OneHR joint UN centre for Human Resources**, which provides for reference check verifications for international professional level candidates.

UNHCR participated in the co-development of the standard operating procedures, standards and all aspects of the reference verification service. In addition to standardizing our reference verifications among UN system agencies, UNHCR will also benefit from the advanced technology solutions, cost savings and shared information and remain an integral part of the direction of OneHR going forward. UNHCR's Division of Human Resources will also in 2019 create a Risk Oversight Unit to ensure appropriate and in-depth reference checking of all recruits, coordination with NGOs and partners and support to the OneHR UN reference system. These activities, focussed on due diligence regarding potential UNHCR personnel, complement the organization's broader suite of compliance, capacity-building, cultural change activities targeting existing UNHCR personnel which are outlined later in this document.

Systems and Tools

In September 2018 a new 24/7 external **Speak Up Helpline** will be introduced to provide an additional reporting mechanism for UNHCR personnel and to further promote a speak up culture in the organization. The Helpline services will be available by phone and web, including the possibility to report in complete anonymity, to all colleagues who wish to report misconduct or obtain advice on what to do when in doubt. Along with the new **Administrative Instruction on Protection against Retaliation** that was issued in August 2018, these measures are important steps toward our aim of increasing confidence and reporting, and placing survivors at the centre of our response.

In 2019, the IGO plans to implement a new **investigations case management tool**, including software, installation, maintenance, and loading historical data to ensure that the increased needs for data capture, analysis, reporting and case management are met. This would improve search and data analysis, enable early identification of trends and red flags, and ensure that all stakeholders, including donors, receive timely and informative reports. To complement this, UNHCR plans to investigate the use of **text-based artificial intelligence** to analyse IGO complaints (fraud, corruption and other kinds of misconduct) to improve the efficiency of response, determine trends and strengthen identification of 'high-risk' contexts. This would be part of a package of measures to explore innovative behavioural science and communication approaches to creating organizational culture and behaviour change on Integrity issues.

UNHCR is also taking advantage of new advances in information technology to **modernize its registration systems**, with the overarching objective to develop and implement a new concept of digital identity that will be more accountable and transparent, and empower the individual asylum seeker, refugee, and IDP. A higher performing and empowering system includes a revamped refugee registration and case management system (proGres version 4), biometric enrolment system (BIMS), multi-purpose (off-line) rapid enrolment application, and a dataport. This suite of tools is called PRIMES. Specific ProGres v4 functions (resettlement, SGBV, child protection, RSD, fraud, and legal and physical protection needs, and statelessness v4 modules) help to minimize risks while strengthening quality of and confidence in protection-related data, and support UNHCR's accountability and integrity vis-a-vis persons of concern and other stakeholders.

UNHCR's Division of Financial and Administrative Management (DFAM) has also proposed a number of **technological solutions in the area of fraud prevention and response**. These include reviewing tools and systems to improve cyber-security and enhance electronic fraud detection systems in financial transactions through Optical Character Recognition (OCR) technology and Artificial Intelligence solutions. Fraud detection would also be strengthened through the development of iGuard, which is a practical and hands-on tool guide designed to assist field colleagues and Project Control Officers to better detect potential, presumptive fraud when verifying partners' performance. Meanwhile the joint Partner Portal developed with other UN agencies will be expanded to add an "Audit Management Module" to enhance assurance over resources entrusted to partners and a risk-based audit approach for management of UNHCR-funded projects introduced. UNHCR would also undertake a project to develop and implement Statements of Internal Controls, which require managers to underwrite written attestations of proper controls in their respective functional areas of work. As part of the project, UNHCR would conduct an assessment of best practices in the United Nations System, Governments, and Private Sector and develop internal policies, procedures and tools as necessary.

With a great deal of public interest in integrity issues, including SEA/SH, UNHCR has established a **Public Information Officer (PIO)** position to respond to queries and coordinate the production of timely and accurate information on these issues. Communications products, including a dedicated webpage on SEA and SH to aid transparency towards external audiences, and to highlight UNHCR actions, reports and stories relating to SEA, SH and SGBV activities and initiatives, will be established. A dedicated page on the UNHCR Intranet will also support easy and comprehensive access to a range of options and offer a potential platform for dialogue. In 2019, UNHCR also plans to implement an internal **Ideas Platform** - a safe space for UNHCR colleagues (and partners) to share and develop innovative solutions to prevent and respond to issues related to SEA, SH, fraud and corruption.

Recent IGO investigations have illustrated a lack of awareness among UNHCR personnel related to their conflict of interest declaration reporting obligations and related under-reporting. UNHCR is therefore piloting online **Conflict of Interest** declaration mechanisms for personnel in selected countries. The introduction of annual declarations would strength accountability and proactively engage personnel in ethical behaviour.

An important part of UNHCR's overall approach to integrity is ensuring that we uphold the principles of **Accountability to Affected Populations (AAP)** that emphasise "putting people first" and commit us to hold ourselves accountable to the people we serve in all aspects of our work. To further this agenda, UNHCR plans to create an Accountability Officer position, to provide policy and technical support, and bring existing UNHCR initiatives together and develop organizational strategies and mechanisms to strengthen AAP. This includes support to operations in: employing participatory methodologies at each stage of the operation cycle; developing approaches to communicating in an appropriate and accessible way to all groups in a community; establishing and promoting feedback and response systems, including for confidential complaints; and adapting programmes and strategies in response to input from persons of concern. These are crucial elements in managing risk and informing decisions that uphold integrity and accountability for protection and assistance,

solutions and services, including protection from SEA, GBV, and awareness of fraud, corruption and misconduct.

Cultural Change and Capacity Building

One key aspect of UNHCR's approach to Investing in Integrity is promoting a positive, values-based culture where dialogue is encouraged, different opinions solicited, and where it is safe to speak up. Activities aimed at increasing the capacity of all UNHCR personnel to understand and act on their responsibilities with respect to combating fraud, corruption, SEA, SH and other forms of misconduct are therefore vital. UNHCR has in place, and is planning, a range of mutually reinforcing training programmes and awareness-raising initiatives that are designed to ensure that all personnel can be reached with information and activities that are most appropriate to their function, location and level of responsibility.

One key activity proposed to begin in late 2018 is a two-year collaboration with an international NGO specializing in **attitudinal training** using an experiential approach. The project aims to support individual and organizational culture change and contribute to an environment where colleagues understand the impact of, and can take measures to prevent, mitigate and respond to, sexual harassment in the workplace and SGBV (including SEA) for persons of concern. More than 2,200 managers in over 30 countries will be targeted as a priority audience, as they are key in creating change at individual and institutional levels. Some 25 staff will be trained as trainers to replicate the methodology. A project coordinator will manage the relationship with the selected NGO and coordinate the development and implementation of activities.

Another training aimed at change regarding SH issues is the **Women's Security Awareness Training (WSAT)**, which is planned to be delivered in 20 countries through 34 sessions reaching around 850 personnel in 2019. The WSAT programme is managed through a WSAT/Gender Coordinator who supports and facilitates delivery through a small team of female field security personnel. WSAT is a training delivered by women for women, and a module within this two-day training covers the identification, prevention and response to SH. Potential situations of harassment in the workplace that are raised during WSAT sessions are addressed by the WSAT/Gender Coordinator to the managers and/or to appropriate services at headquarters to ensure action is