

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 whistleblower 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 taken. UNHCR also includes focused sessions on sexual misconduct and the role of the Field Security Advisors (FSA) is addressing this in its **FSA training**, which 50 FSAs will have undertaken during 2018. In 2019, this will be expanded from one day to three days, with 10 workshops planned for 220 FSAs to have training on integrity issues.

With respect to fraud by persons of concern, the **High Commissioner's Policy and Operational Guidelines on Addressing Fraud by Persons of Concern** was issued in October 2017 to comprehensively address fraud throughout the individual case management continuum: from initial registration, through all protection and assistance activities, and to solutions. In order to successfully operationalize the Policy and strengthen understanding among UNHCR personnel, we are in the final stages of developing the **Integrity Learning Programme** which will be rolled out through 2018 and 2019 by the Global Learning Centre. The GLC also plans to **build overall capacity of UNHCR**

leaders through coaching sessions for 45 heads of office deployed in high risk duty stations and mentoring for 25 new Representatives in 2019. The GLC will also consolidate the preparatory work for Resident Coordinator (RC) assessment programmes and provide personalized preparation for up to five RC candidates.

Reinforcing UNHCR's Values and Code of Conduct (CoC) through learnings and trainings is also a key part of UNHCR's suite of capacity building measures. A new online CoC manual will be developed, connecting UNHCR vision/purpose, values and principles with action-oriented guidance for everyday behaviour. Two regional train the trainers sessions will also be undertaken to help prepare facilitators to conduct and follow-up the annual CoC session in their operations and build a network to roll-out the New Approach to Ethics in the field. To strengthen ethics learning, two Senior Ethics Advisor positions would be created (Nairobi and Bangkok), along with more webinars and field missions.

In 2018, it was decided that the existing eLearning "**Fundamentals of Fraud and Corruption Awareness**", launched end of 2016, will become mandatory to all UNHCR personnel. The objective of this course is to introduce information on what constitutes key fraud and corruption schemes and how to avoid fraud occurrence in the first instance. With the eLearning being mandatory, UNHCR will ensure that it is available in all six official UN languages.

In 2018 and 2019, the Ombudsman's Office will revise and continue the co-delivery of the **Conflict Management and Mediation Skills Programme (COMP)** with the GLC, which has already benefited more than 3,000 colleagues. An **Active Bystander Campaign** has also been launched, which aims to enable UNHCR personnel to notice and successfully intervene when people act in an inappropriate and unacceptable manner with others. The Active Bystander Campaign includes an awareness-raising poster and video series as well as a flexible training module on bystander behaviour with exercises to be ready-to-adopt in existing online or face-to-face trainings such as management workshops, SH learning package, integrity learning package, COMP, and induction and orientation programmes. The preparation and finalization of the training module would require the service of an expert consultant who will be hired in 2019.

Twenty-two per cent of total misconduct allegations received in 2017 were against UNHCR partner personnel, so UNHCR is also working to **strengthen its NGO partner capabilities**. Through five planned regional investigation workshops per year, UNHCR will strengthen partner capabilities to investigate misconduct allegations against their own staff and report them to the IGO. UNHCR also plans a targeted approach to **enhancing partners' internal controls and management skills**. Audit findings and internal control assessments provide valuable information that can be capitalized and exploited to support and coach partners to graduate into more competent level. UNHCR will be selecting partners and engaging specialised agencies to coach and provide hands-on support for fixed period with clear expected results and improvements

Support to Staff

UNHCR personnel in the field have access to a dedicated pool of trained peer support volunteers, as well as specific focal points on sexual and gender-based violence (SGBV) and PSEA, to help with psychological first aid and guidance on access to reporting mechanisms and support services. A number of different programmes are available to ensure that staff have support and guidance appropriate to their specific needs.

With the new Speak Up Helpline being established in September 2018, it is important that no-one feels overwhelmed by the process of making a complaint. A **Psychological Case Management system** is therefore being put in place to support survivors and witnesses of sexual harassment. The Psychological Case Manager will provide expert guidance on processes and services, assess risks and individual needs, support informed decision-making, and accompany complainants through their journey and coordinate action on their behalf until their case is resolved.

Also to strengthen UNHCR's support network in the field, a **Peer Advisors Network** will be established by combining the existing pool of 383 Peer Support Personnel, who are trained in basic counselling skills including psychological first aid, with the existing pool of 100 Respectful Workplace Advisors, who are trained to provide guidance to colleagues in addressing workplace grievances. By creating a single identity for this body of staff-volunteers, we aim at strengthening their role in organising support to personnel following critical incidents, in prevention and response to SH and abuse in the workplace, and in constructively resolving interpersonal tensions and difficult team dynamics. The Peer Advisors Network will be coordinated by a **Psychosocial Learning Officer**, who will also oversee additional training, building the knowledge base through existing on-line trainings and webinars, while using face to face training for skill strengthening and assessment. Some 400 existing network members will need to take part in the training in 2019.

In 2018, an **Ethics Officer (PSEA) position** was created to focus provide support to the PSEA systems and focal points (over 200 now in place) in the field and to create and deliver assessment, training, monitoring, and awareness raising tools. A train the trainers will allow regional PSEA focal points in five regions to roll out training to country PSEA focal points in 2019, including follow-up training and support to the implementation of action plans.

Coordination and Frameworks

In March 2018 the High Commissioner appointed a **Senior Coordinator on SEA and SH** to lead and coordinate UNHCR's work in this vital area. A strategy on addressing SEA/SH was released in May 2018 with an action plan which is being carried forward by cross-divisional teams involving more than ten different UNHCR services and entities. The action plan is rightly ambitious and requires that a robust coordination structure be put in place to ensure timely and effective delivery. In 2019 UNHCR plans to increase staffing capacity with a Coordination Officer, External Relations & Reporting Officer, and Policy Officer to support the implementation of the SEA/SH strategy and work plan.

UNHCR also continues to work closely with a range of external partners on **Accountability to Affected Populations (AAP) and Prevention of Sexual Exploitation and Abuse (PSEA)**, including by resourcing a full-time dedicated coordinator's post in support of UNHCR's role as Inter-Agency Standing Committee (IASC) AAP/PSEA Task team co-chair. The Task Team comprises of approximately 70 UN Agencies, International and national NGOs, Donors, International Organizations, Humanitarian Networks, Research Institutes and independent experts.

An **evaluative review** has also been commissioned to benchmark and compare UNHCR's policies and guidance on PSEA against UN standards and those of other organization, as well as review and assess adequacy and appropriateness of resources, organizational structure and planned activities. Evaluation Quality Assurance of all evaluations undertaken in UNHCR is also carried out to ensure compliance with UN Ethical Guidelines, while specific evaluations of UNHCR's sexual and gender-based violence (SGBV) response in Brazil and Lebanon have been commissioned and a specific focus on SGBV included in the ongoing L3 emergency evaluation for Bangladesh.

Outcomes

Overall, UNHCR's investment in integrity aim to reduce costs in the longer term by mitigating the risk of misconduct and responding effectively when it occurs. Success in this will mean fewer funds lost to fraud or corruption, fewer cases involving costly litigation, and a reduction in the resources needed for response and support services.

The initiatives outlined in this document, when taken together, represent UNHCR's efforts to drive durable, positive change in the organization that will also increase the efficiency of field and HQ operations through better clarity of roles and improved skills among management and staff. Some indicators of success will come from measuring attitudinal change among UNHCR personnel involved in trainings and other capacity building programmes and from tracking the response to the 'speak up' and 'active bystander' campaigns.

UNHCR will be striving to ensure that opportunities for fraud, corruption, and sexual exploitation and abuse of persons of concern are identified earlier and stopped. The adoption of policies and procedures to improve compliance, implementation of oversight recommendations, and building of risk management into strategic planning and decision-making are among the indicators of progress in this goal. In terms of response to cases of misconduct, the additional resources UNHCR has dedicated to the IGO investigators and LAS legal teams will ensure that, for example, cases of SEA/SH are dealt with within the targeted timeframe of 3-4 months.

UNHCR's investments in changing culture and systems should see progress toward this goal, notwithstanding that in the near-term the number of cases may continue to increase due to better awareness and reporting mechanisms for UNHCR personnel, partners and persons of concern. At the same time, new case management and other business intelligence tools will allow UNHCR to more effectively track, analyse and report on trends regarding cases of misconduct both internally to assist in refining our response and externally to donors and other partners.

Resource Requirements Summary

This document collates the activities being undertaken, and planned to be undertaken, relating to UNHCR's efforts to enhance Integrity across the organization and to prevent and respond to SEA/SH, fraud, corruption, and other forms of misconduct. UNHCR is seeking support from key donors to help us ensure that these measures can continue to be implemented and enhanced to ensure that we continue to meet the high standards that are expected of us.

Support for these integrity efforts is an investment in reduced costs in the longer term. While better reporting, awareness and support systems may increase the number of cases in the near term, UNHCR's preventative efforts aim to reduce the number of incidences of fraud, corruption, SEA, SH and other forms of misconduct over time as the organizational change efforts bear fruit. More investigation and legal resources will mean smaller amounts of staff time lost during and after the resolution of cases, while more efficient systems and tools will help us to identify trends and target interventions to address emerging issues more quickly. Better risk management and enforcement measures should see less funds lost to fraud and corruption that can and should be directly spent assisting persons of concerns to UNHCR.

The resource requirements outlined include measures that are already underway in 2018 and will be continued in 2019, as well as additional activities that will further enhance and accelerate UNHCR's integrity efforts in 2019. Investing with us in these areas will be a vital show of support that strengthens the partnership, based on mutual trust and integrity, between UNHCR and its key donors and supporters.

Integrity Measures	2018	2019	TOTAL
Risk Management, Investigation and Compliance	4,135,926	7,649,558	11,785,484
Systems and Tools	977,948	5,169,489	6,147,437
Cultural Change and Capacity Building	937,385	3,151,834	4,089,219
Support to Staff	257,260	1,135,086	1,392,346
Coordination and Frameworks	937,437	923,832	1,861,269
Total	7,245,956	18,029,799	25,275,755