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**Executive Committee of the  
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Item 5 of the provisional agenda  
**Consideration of reports relating to programme  
and administrative oversight and evaluation**

## **Report on activities of the Inspector General's Office**

### **Report of the High Commissioner**

#### *Summary*

This report covers the work of the Inspector General's Office for the period from July 2020 to June 2021. It is provided pursuant to the decision of the Executive Committee of the High Commissioner's Programme to consider reports relating to programme and administrative oversight and evaluation during its annual plenary session (A/AC.96/1003, para. 25(1)(f)(vi)). The Executive Committee has further requested that "summary reports covering inquiries and the main categories of investigations, the number of such types of investigations, the average time taken to complete investigations and a description of related disciplinary action" be made available regularly (A/AC.96/1021, para. 24(e)).



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## I. Executive summary

1. This report outlines activities undertaken by the Inspector General's Office (IGO) from 1 July 2020 to 30 June 2021. Despite the ongoing COVID-19 related restrictions, the IGO continued to deliver on its remit, in accordance with the policy on independent oversight and administrative instruction on conducting investigations in UNHCR.

2. During the reporting period, the IGO continued to: work closely with entities serving as the first-, second- and third-lines; coordinate the work of independent oversight providers; conduct assessments and investigations of complaints relating to misconduct; and contribute to prevention and mitigation of risks through, inter alia, the provision of training, conducting of reviews of particular thematic areas, and issuance of management implication and other reports.

## II. Management

### A. IGO strategy 2021-2026

3. The Inspector General, who took up his functions as of March 2020, has a non-renewable term of six years, with no expectation of further employment with UNHCR. The terms of reference of the Independent Audit and Oversight Committee (IAOC) were amended in March 2019 to expand its role and provide advice to the High Commissioner on the appointment and early termination of UNHCR's Inspector General, where appropriate (See [EC/70/SC/CRP.5 Rev1](#)).

4. As the Inspector General commenced his term, a priority was to develop a strategy for the work of the Office for the period of his tenure. This strategy was developed and linked to UNHCR's wider results-based management system. The key intended outcome from the IGO's work is to ensure that the organization has an effective independent oversight system, giving confidence to relevant stakeholders over UNHCR's efficiency, economy and effectiveness. Key supporting outputs are: to ensure that oversight work is well-understood and coherently delivered; to further enhance and refine investigations work to respond to integrity concerns; and to ensure effective learning and risk prevention responses from oversight and investigations work.

### B. Improving the work of the Inspector General's Office

#### *Continued improvement of standard operating procedures*

5. During the reporting period, the IGO continued to revise and develop a number of internal procedures to further improve and harmonize its ways of working. The IGO finalized its internal standard operating procedures on a victim-centred approach, in line with the "[Policy on a victim-centred approach in UNHCR's response to sexual misconduct](#)". The document aims to guide investigators on how to implement such an approach in all areas of their work. In addition, the IGO finalized its internal standard operating procedures, a document which provides procedural guidance for the efficient and effective receipt and processing of complaints by the Intake Unit of the Investigation Service.

6. The IGO worked on developing its digital and forensic capacity. For investigations, this is designed to ensure a "digital by default" approach. In the context of oversight coordination, this will develop the IGO's use of qualitative data analytics, with software and training purchased to deliver on this ambition.

#### *United Nations Development Programme peer review*

7. During the previous reporting period (2019-2020), reviewers from the investigative function of the United Nations Development Programme issued their final report of a peer review of the Investigation Service of the IGO. While the Investigation Service has

addressed most of the recommendations issued, a few requiring additional resources remain open.

*Training of investigative staff*

8. With the aim of ensuring continuous learning and further harmonizing its ways of working, the Investigation Service developed and conducted training sessions for all investigators and support staff. The training provided an opportunity for staff to discuss challenges and exchange experiences, and covered a variety of topics such as: assessing the handling of evidence of complaints; financial and procurement processes; investigating various categories of misconduct; and report writing. Several investigators also participated in a five-day online forensic training to strengthen the forensic investigative capacity of the IGO.

*Participation in the twenty-first conference of international investigators*

9. All investigators participated in the twenty-first conference of international investigators held virtually in May 2021, hosted by the World Food Programme, the International Fund for Agricultural Development, and the Food and Agriculture Organization of the United Nations. The conference, which brought together over 500 investigators from some 50 international organizations, aimed to strengthen the efforts of investigators and their offices in tackling integrity issues through the exchange of ideas and discussion of challenges in the form of deep-dive sessions on particular topics.

## **C. Addressing workplace issues**

*Transfer of portfolio on protection from retaliation*

10. As part of a wider set of changes to UNHCR's handling of workplace issues, and subject to resource capacity, the IGO will undertake a greater role in processes related to protection from retaliation and, more specifically, the investigative work underpinning the prima facie assessment of retaliation complaints. This portfolio is currently under the remit of the Ethics Office. The timing of the transfer, prerequisite policy revisions and the details of handover are under discussion.

*Referral of cases relating to workplace issues*

11. Given recent organization-wide decisions to strengthen the people management skills of managers through stronger emphasis on helping them address workplace issues locally, early and effectively, coupled with the need for the Investigation Service to further prioritize its workload given current resource constraints, workplace issues are increasingly being referred for further action to management colleagues who are often better placed to resolve such matters.

## **D. Working in partnership**

12. The IGO worked in close collaboration with both internal and external stakeholders, with the objective of optimizing effectiveness and efficiency.

*Collaboration with external actors*

13. During the reporting period, the Strategic Oversight Service provided secretariat support to three sessions of the IAOC, held virtually in November 2020 and March and June 2021. In addition to its regular meetings with all oversight entities and the Division of Financial and Administrative Management (DFAM), the IAOC focused on change management, ethics and workplace grievances with the relevant entities. The IAOC shared its independent observations with the High Commissioner and the Deputy High Commissioner at the conclusion of each session for management response.

14. In its capacity as UNHCR focal point for the Joint Inspection Unit of the United Nations System (JIU), the IGO continued to liaise with this body. It coordinated UNHCR's

contributions to seven system-wide reviews issued in 2020 and the first half of 2021, providing feedback on terms of reference and completing questionnaires. These included reports on environmental sustainability, enterprise risk management and the investigation function. The IGO also coordinated, in collaboration with internal actors, ongoing reviews related to cybersecurity, ethics, business continuity and implementing partnership management. On behalf of UNHCR, the IGO also submitted three detailed proposals to the JIU's programme of work for 2022, which is to be finalized later in the year. In close coordination with relevant headquarters entities, the Strategic Oversight Service provided updates to the JIU, resulting in the closure of a considerable number of outstanding recommendations, notably eight pre-2020 open recommendations and 40 from 2020.

#### *Collaboration with internal actors*

15. The IGO provided updates, advice and early warning to executive and senior management through regular meetings on matters relevant to its mandate. It liaised closely with the Division of External Relations on donor reporting requirements and media queries.

16. In addition, the IGO worked closely with the Division of Human Resources (DHR) and the Legal Affairs Service (LAS) on investigation-related matters and disciplinary proceedings. It collaborated with the Ethics Office and the Ombudsman's Office on matters relating to dispute resolution and witness protection, and with the Senior Coordinator on prevention and response to sexual exploitation and abuse, and sexual harassment on matters related to sexual misconduct. It also worked closely with other entities, including DFAM and Enterprise Risk Management (ERM).

17. The IGO collaborated with the regional bureaux through, inter alia, the commencement of an internal review of the bureaux' second line oversight activities to understand how this is functioning in practice, following the internal restructuring and regionalization and decentralization from 1 January 2020.

18. The IGO also supported UNHCR country offices. The Inspector General went on his first field mission since taking office to the operation in Uganda in May 2021, which had been delayed due to COVID-19 related restrictions. Subject to the further lifting of restrictions, the Inspector General plans to travel to other regions, in support of his oversight role.

19. The IGO managed UNHCR's relationship with the Office of Internal Oversight Services (OIOS) of the United Nations for the provision of internal audit services to UNHCR, in accordance with relevant General Assembly resolutions and a memorandum of understanding signed in March 2018. The existing memorandum of understanding is due for review and is in the process of being revised, in consultation with OIOS.

20. During the reporting period, the IGO continued to facilitate quarterly coordination meetings with UNHCR's internal and external oversight providers, with the aim to ensure efficiency and a balanced approach in terms of both process (field impact) and risk coverage, in particular in the context of the COVID-19 pandemic. Internal actors participating comprised the Evaluation Service, ERM and the UNHCR Internal Audit Service of OIOS; while external actors comprised the JIU and the United Nations Board of Auditors.

## **E. Analysis of oversight findings**

21. The Strategic Oversight Service completed its second annual exercise, analysing oversight findings based on internal audit, evaluations and other oversight reports issued in 2020.

22. Similar to 2019, the most frequent findings related to planning (emergency and non-emergency), data collection and needs analysis, management of partners and procurement. The major findings issued in 2020 were largely consistent with the previous year and generally correlated with components of relevant risk registers. This is an indicator that UNHCR's levels of compliance remained steady throughout the COVID-19 pandemic.

*Thematic and other reviews*

23. The IGO completed a proactive risk review of the impact of the COVID-19 pandemic on the management of implementing partners in selected country operations. The review found that, with necessary adaptations, UNHCR's operations were able to continue performing key procedures for the management of implementing partners. This was consistent with the findings of other COVID-19 related oversight activities.

**F. Human Resources***Staffing structure and changes*

24. The IGO continues to strengthen its presence in the field and currently maintains a presence in Amman, Bangkok, Nairobi and Pretoria. It has also had a presence in Uganda on a temporary basis since 2018. The staffing of the IGO has expanded from 30 positions in 2016 to 38 positions in 2021. The Investigation Service has had a considerable increase in its caseload in the past few years, which necessitated a corollary increase in human resources.

25. During the reporting period, the IGO made changes to its staffing complement, specifically the recruitment and onboarding of the Head of Strategic Oversight Service in June 2021, filling a leadership position that had been vacant since November 2020. In addition, Strategic Oversight moved positions to field locations in Amman and Pretoria, adding to the IGO's existing presence in those locations. The Investigation Service recruited and onboarded a forensics specialist and the Head of the Investigation Unit in Amman. These positions strengthen the IGO's field presence and create a hub of digital expertise in Amman.

26. The Investigation Service of the IGO has professionalized its staffing progressively since 2015, following relevant recommendations resulting from a periodic peer review conducted by the European Anti-Fraud Office (OLAF). It now employs senior investigators with specialized investigative experiences from police, military intelligence, war crime tribunals and other investigative bodies. Over the next few years, the IGO hopes to create junior investigator positions and provide in-house training that will eventually lead to a further increase of geographical and gender diversity in its staffing, especially at the more senior levels.

*Future outlook*

27. The IGO will strive to reinforce its presence in the field, subject to the availability of resources. While positively recognizing the additional resources incrementally allocated over the past few years, the IGO notes the increase (by three-fold from 2017 to 2018) in its caseload over the same period. To respond to increasing demand, address complaints in a timelier manner and undertake the new portfolio being transferred from the Ethics Office, the IGO will keep its resourcing under close review.

**III. Complaints and investigations****A. Caseload and reporting**

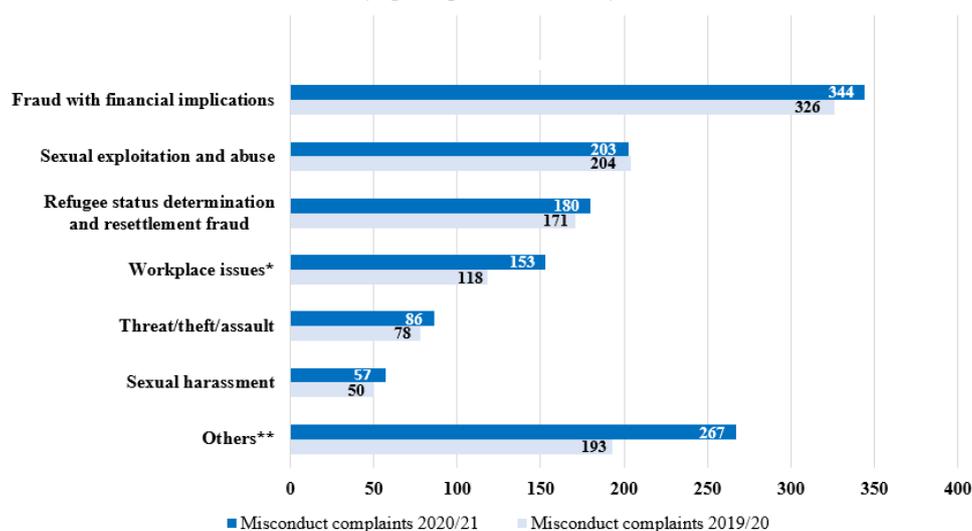
28. During the reporting period, the IGO recorded 1,290 misconduct complaints, which represents a 13 per cent increase compared to 1,140 during the previous reporting period. The increase may be attributable, but not limited to, continued awareness-raising sessions organized by the Investigation Service of the IGO; strengthened emphasis by executive management on integrity and people matters; increased deployment of risk managers in the field; and the gradual lifting of COVID-19 related restrictions on movement in some regions, which may have resulted in more in-person presence and control measures.

29. Despite innovative ways of working, some investigations requiring persons of concern to be interviewed or physical evidence to be seized were delayed until travel restrictions could be lifted.

30. As shown in table I below, the three main categories of complaints of misconduct related to: (i) fraud with financial implications (27 per cent); (ii) sexual exploitation and abuse (16 per cent); and (iii) refugee status determination and resettlement fraud (14 per cent). These were also the main three categories in the previous reporting period. Forty-five per cent of complaints of misconduct implicated UNHCR personnel and 31 per cent implicated implementing partner personnel, while 14 per cent implicated other personnel, including contractors and national authorities. In terms of breakdown by region, Africa (48 per cent) followed by the Middle East and North Africa (24 per cent) recorded the highest proportion of complaints, a similar trend and distribution compared to recent years.

**Table 1**

**Distribution of misconduct complaints  
2020/21 compared to 2019/20  
(Top categories for 2020/21)**



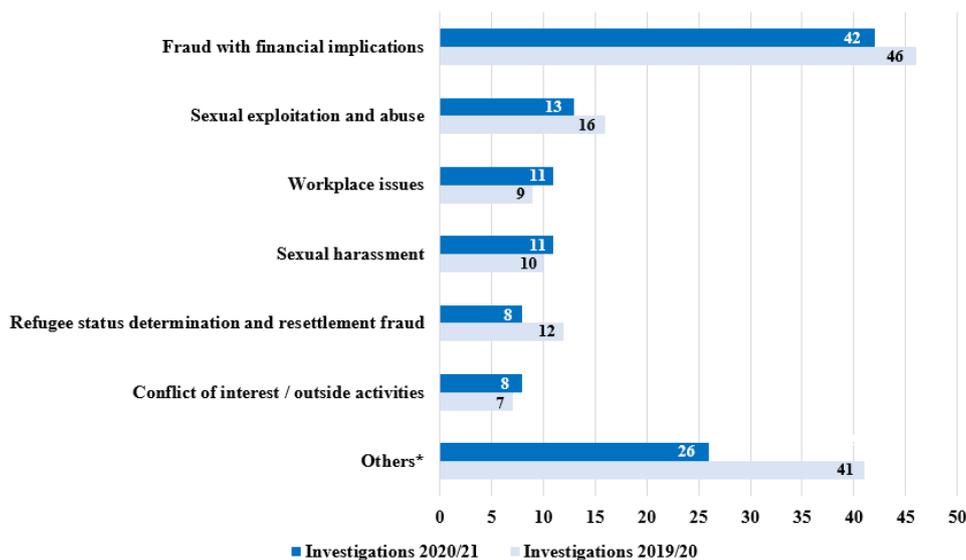
\* The 'workplace issues' category includes the following: abuse of authority, discrimination, fraud relating to recruitment / assignment processes, harassment and retaliation.

\*\* The 'others' category includes *inter alia* the following: academic fraud, discrimination, gross negligence and non-compliance with UN or UNHCR administrative instructions.

31. The IGO opened 116 investigations (implicating 119 personnel), representing a slight decrease compared to 126 investigations opened during the previous reporting period. A breakdown of the type of complaints of misconduct during the two reporting periods is shown in table 2 below. The three main categories of investigations opened relate to: (i) fraud with financial implications (42 investigations); (ii) sexual exploitation and abuse (13); and (iii) sexual harassment (11) and workplace issues (11).

Table 2

**Distribution of investigation cases 2020/21 compared to 2019/20**  
(Top categories for 2020/21)



\*The 'Others' category includes *inter alia* the following: academic fraud, discrimination, gross negligence and non-compliance with UN or UNHCR administrative instructions.

32. Investigations implicating 143 individuals were finalized, representing a slight increase compared to investigation implicating 138 individuals that were finalized during the previous reporting period. Of these, 82 cases implicating UNHCR personnel were substantiated and referred to DHR for disciplinary action, and one case implicating an implementing partner personnel investigated by the IGO was substantiated and referred to the Implementing Management and Assurance Service of the Division of Strategic Planning and Results for further action. Fifteen investigations were closed due to other reasons, and the remaining 45 cases were closed as the complaints could not be substantiated or were unfounded.

33. During the reporting period, and following the completion of the disciplinary process, a total of 42 disciplinary measures were imposed on 42 UNHCR staff members, with 24 (57 per cent) being dismissed or separated. Concerning members of UNHCR's affiliate workforce, the contracts of four individuals were terminated, while the contract of a fifth individual was not renewed following completion of an investigation. A further four individuals had left UNHCR before the completion of the investigatory or disciplinary processes, and a further four individuals' contracts expired before completion of the investigatory or disciplinary processes.

34. During the reporting period, the cases of 12 staff members were referred, through LAS, to respective national authorities for criminal accountability. Results of the referrals were pending as of 30 June 2021.

35. The Investigation Service strived to address its workload in a timely manner, despite resource limitations. As a result, 76 per cent of complaints relating to misconduct were assessed within the IGO's internal target of eight weeks. The assessments of complaints relating to sexual exploitation and abuse, however, were completed slightly faster, with 79 per cent being finalized within its internal target of four weeks. Fifty-six per cent of all investigations were finalized within the target timeline of six months.

36. To make the best use of its limited resources, the Investigation Service continued to prioritize cases that required urgent attention, including those related to sexual misconduct or that posed serious financial or reputational challenges, and deprioritize proactive investigations.

37. Of all complaints of misconduct assessed during the reporting period, 39 per cent required no further action and were closed; 13 per cent led to the opening of investigations; and 8 per cent required further information. Forty per cent were referred to the relevant entities, with the breakdown of the referrals as follows:

(a) to management for action when this was considered the most appropriate course of action (46 per cent);

(b) to the investigative bodies of implementing partners (39 per cent); and

(c) to the OIOS Investigations Division for cases where there was a conflict of interest, in accordance the memorandum of understanding signed in 2006, as well as to investigative bodies of other United Nations entities and those of national authorities (15 per cent).

38. Given increased reporting requirements since 2018, the IGO invested in enhancing the Investigation Service's database, iSight, to archive and track vital case-related information more accurately, as well as to improve workflow processes and archiving capability. Technical challenges in the upgrade of iSight persist, which have led to delayed finalization of the enhancement process. The IGO is currently working with the software company to resolve remaining issues.

## **B. Protection from sexual exploitation and abuse, and sexual harassment**

39. During the reporting period, the IGO received a total of 162 complaints relating to sexual exploitation and abuse with identified or identifiable victims, meeting the criteria for reporting to the United Nations Secretary-General. This is an increase compared to 132 complaints received during the previous year.

40. There were 26 complaints implicating UNHCR personnel. Of those, eight cases were closed at the complaint level and seven were pending assessment. A total of 11 investigations were opened by the IGO. Of these, nine remained under investigation, while two were substantiated.

41. There were 135 complaints implicating implementing partner personnel. Of those, 71 were closed at the complaint level and 12 were pending assessment. The investigative bodies of the concerned partners opened 52 investigations, of which 36 are ongoing. Sixteen investigations were finalized, of which three were unsubstantiated, four were substantiated and the results of the remaining investigations are pending. Of the four substantiated, three cases saw the individuals involved dismissed. The subject category of the one remaining complaint is currently unknown.

42. The number of complaints of sexual harassment increased during the reporting period, from 49 compared to 39 during the previous reporting period. Thirty-two complaints implicated UNHCR personnel, 14 implicated implementing partner personnel and three implicated other categories of subjects. Of the 32 cases implicating UNHCR personnel, seven victims decided not to pursue a formal process following informal consultations with the IGO, mostly because the victims did not want the subjects to know that they had lodged a formal complaint or decided to resolve the matter informally through other available mechanisms.

43. During the reporting period, the IGO conducted a review of data on complaints of sexual exploitation and abuse, which it holds confidentially, to identify lessons learned and to enhance UNHCR's prevention and response activities. The report analysed the data and reviewed relevant investigative processes as applied to different investigation subject types. The report, designed to support UNHCR's management team to understand trends, risks and issues related to sexual exploitation and abuse, as investigated by the IGO, was shared with executive management and other relevant colleagues for their consideration and action, as appropriate.

44. The IGO collaborated with several system-wide entities on investigation matters related to sexual exploitation and abuse, including the United Nations Special Coordinator on Preventing Sexual Exploitation and Abuse, the Inter-Agency Standing Committee (IASC)

and the United Nations Representatives of Investigative Services. Internally, the IGO participated in and contributed to organization-wide discussions and initiatives relating to the prevention and response to sexual exploitation and abuse, and sexual harassment.

45. During the reporting period, the IGO developed content for an e-learning package for implementing partners to develop and enhance their investigative processes concerning sexual exploitation and abuse. Once finalized, it will be distributed to a wide audience, including IASC partners.

### **C. Commitment to prevention through awareness-raising**

46. The IGO is committed to ensuring learning from investigations activity. During the reporting period, the IGO increased the quantity, depth and quality of its reporting to UNHCR management in support of this commitment.

#### *Management implication reports*

47. The IGO continued to issue management implication reports to executive and senior managers at Headquarters and in the field, in situations where deficiencies in control systems and operational processes were identified in the course of investigative work. Thirty-six reports were issued during the reporting period, compared to 23 in 2018-2019 and 25 in 2019-2020. The reports covered the following thematic areas: fraud with financial implications, including procurement fraud (18); process deficiencies and policy matters (8); operational and managerial issues (3); sexual exploitation and abuse (2); human resources (2); and others (3). The compliance rate remained high, with management required to inform the IGO about the actions taken to remedy the identified weaknesses.

#### *Presentation of investigative processes*

48. Despite its inability to undertake missions due to COVID-19 restrictions, the Investigation Service provided virtual presentations on the investigative process to UNHCR personnel. During the reporting period, the Investigation Service provided five presentations to regional offices or functional units, reaching over 400 personnel. All presentations had components on addressing sexual exploitation and abuse, and sexual harassment.

## **IV. Conclusion**

49. During the reporting period, the IGO delivered on its mandate and remit in the face of COVID-19 related restrictions. While the pandemic provided some limitations to the IGO's work, it also presented opportunities, including for investment in improving the efficiency and effectiveness of its work and reshaping of its staffing presence and profile.

50. As UNHCR adjusts to a period of organizational reform and change, and faces the prospect of emergence from the global pandemic, the IGO will continue to focus on its mission to ensure UNHCR has an effective independent oversight system. This will both support and challenge the executive management team, and UNHCR more generally, to ensure effective learning and risk mitigation from oversight work.

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