

ANNEX 8a

Integrity toolkit

Prevention and response mechanisms



Communication and information dissemination

Operations should develop communication materials that clearly outline the key features of current and available programmes, and the interventions provided to persons in need of international protection by UNHCR and partner organizations. As well as addressing the knowledge gaps among refugee communities around complementary pathways, this also supports individuals to differentiate legitimate pathways from illegitimate schemes. UNHCR can also play an important role in information-sharing among different actors for anti-fraud purposes. This includes the sharing of knowledge and expertise around context-specific integrity measures as well as trends around fraud and reporting between partners.



Capacity building with communities

Messaging should highlight that complementary pathways programmes sometimes require financial obligations and fees. It should also underscore that people in need of international protection should rigorously confirm that programmes are legitimate before making financial commitments to them. Initially, UNHCR should engage with partners, including refugee communities, to assess information and knowledge needs on complementary pathways. It is important to understand how refugees determine whether a pathway is genuine, viable or legitimate—especially in the context where financial requirements are often built into programme design. Refugees have indicated that they tend to trust opportunities more when UNHCR has endorsed or disseminated them. Important tools include establishing focal points and building basic literacy around the differences between resettlement and complementary pathways, increasing knowledge of different partners working on complementary pathways and improving availability of reliable online resources.



Complaints mechanisms

As UNHCR's roles in complementary pathways are not generally linked to case processing, there are only a few scenarios where UNHCR is required to investigate complaints around complementary pathways. These include:

- conducting registration for the purposes of facilitating complementary pathways, and/or providing further case processing support;
- issuing identity or travel documents to people registered with UNHCR, and who depart on complementary pathways;
- supporting with exit formalities and advocating with authorities on behalf of individuals to procure exit clearance;
- identifying, screening, and/or referring cases for complementary pathways (i.e., conducting case processing activities).

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Counselling

Counselling on complementary pathways should reiterate the obligation to provide truthful information to UNHCR and partners and contain information on how and where to report information about possible fraud.



Standard operating procedures

Each operation should establish SOPs around complementary pathways, which should include an integrity component. SOPs should set out transparent and objective identification criteria, define UNHCR's engagement as well as the procedures and roles of staff supporting refugees to access complementary pathways and complaint mechanisms.



Risk review and treatment plan

Risks and areas of vulnerability surrounding complementary pathways should be factored into operational risk reviews, conducted in line with the requirements of the Operational Guidelines (see also [UNHCR's Risk management tool on Resettlement and Complementary Pathways](#)).

Safeguards that UNHCR operations can put in place to protect the integrity of complementary pathways

1) Communication with communities

Ensure that, in programme design, eligibility criteria are clearly articulated and communicated (on websites, in promotional materials, through community structures and social media, etc.). Confirm that the formulation of eligibility criteria is objective, equitable and considers the principle of non-discrimination.

Invest in awareness-raising among refugee communities on complementary pathways.

Build basic literacy around complementary pathways and other third-country solutions and protection responses, and disseminate information about partners working on complementary pathways.

Develop materials that clearly outline the key features of programmes and support available. Such materials should include explicit information on any financial obligations and fees possibly required for accessing pathways. The need to verify the legitimacy of programmes before making financial commitments must be reiterated through these.

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2) Internal procedures and systems

Have defined procedures and roles for staff responsible for complementary pathways.

Designate complementary pathways focal points in UNHCR and partner organizations to field inquiries from refugees and other partners, and to receive and share information about opportunities.

In accordance with the [UNHCR Policy on Addressing Fraud Committed by Forcibly Displaced and Stateless Persons](#), ensure proper feedback and complaints mechanisms are in place for refugees to access to report fraud and/or to clarify information.

Ensure consistent updates of proGres, physical files and master lists.

Conduct regular fraud risk reviews integrating complementary pathways, considering areas of vulnerabilities in the local context, and make appropriate adjustments to safeguards.

Note trends and make analyses of pathways-related inconsistencies and allegations.

Conduct social media monitoring (within the Complementary Pathways unit and through the external relations team, as well as community-based protection teams) to identify rumours and exploitation schemes. Develop information materials or messaging, in consultation with the people with and for whom UNHCR works and relevant partners, to quickly dispel misinformation.

3) Partners and coordination

Hold or attend regular coordination/update meetings between UNHCR and partners working on complementary pathways. Coordination between partners should incorporate technical collaboration. This can include processes where UNHCR verifies case information based on proGres with the objective of identifying, preventing and responding to fraud in registration or documentation procedures.

Engage with partners and provide support on bolstering integrity safeguards. This includes mapping partners and their programmes, systems, and any areas of vulnerability/risk (including collaboratively checking for changes in family composition at each stage of case processing for complementary pathways). UNHCR can also share its own experiences in developing fraud mitigation measures in the operational context.

Optimally utilize existing fraud prevention mechanisms to bolster integrity safeguards (e.g., Biometric Identity Management System).

Encourage embassies and third-country partners to advertise on their websites the partners with whom they work on complementary pathways.