

**Annual Tripartite Consultations on Resettlement  
Geneva, 28-30 June 2007**

**Agenda Item 3i**

**Information Note: Resettlement Anti-Fraud Plan of Action**

**Key Messages**

- ✚ Resettlement is an important durable solution for tens of thousands of refugees annually. Fraud, including individual fraud to larger scale criminal enterprises, serves to undermine and even threaten this important durable solution. Fraud has far reaching negative impacts that cast our professional reputations, image and integrity in a poor light. The consequences can be detrimental to refugees as resettlement programmes may be suspended indefinitely while fraud is investigated.
- ✚ UNHCR has clearly stated its commitment to combat fraud and corruption in order to preserve the integrity of resettlement programmes (Resettlement Handbook and Resettlement Anti-fraud Plan of Action).
- ✚ UNHCR interests in maintaining programme integrity and interests of other actors - refugees, UNHCR, host countries, resettlement countries, IOM, NGOs - are the same: integrity is fundamental to the shared process.
- ✚ Resettlement fraud and corruption hurt all those involved in the resettlement process and it is in the common interest of all actors involved to find ways of cooperating at all levels to detect, respond to and prevent fraud.

**Background**

The UNHCR Anti-fraud Plan of Action was developed in response to the Nairobi resettlement scandal of 2000 and a subsequent resettlement oversight missions to a number of countries in Africa undertaken 2001 which noted that inadequate supervision and monitoring, undefined accountability, and lack of effective and standardized procedures threatened the integrity of protection and resettlement activities and left them vulnerable to fraud and corruption.

Both the Agenda for Protection, that resulted from the Global Consultations on Protection, and the Multilateral Framework of Understandings on Resettlement, that was developed in consultation with resettlement governments as part of the Convention Plus dialogue, recognize UNHCR's need to improve its ability to address fraud within the resettlement context and maintain the integrity of the process.

A broad recognition that fraud is a cross-cutting issue, and that resettlement outcomes can be influenced by fraud that enters the system at any earlier stage (from registration onwards), has led the Resettlement Service to drive an integrated approach to anti-fraud efforts. The Resettlement Service has engaged other units such as Registration and the IGO in delivering anti-fraud training and in field missions to assess fraud vulnerability.

The Resettlement Service has established a close working relationship with the IGO on matters related to fraud to ensure that issues related to fraud are properly considered. Matters relating to internal resettlement fraud (fraud involving staff members) are the exclusive domain of the IGO.

## Key Elements

Key elements of the Plan of Action relate to the need to increase staff awareness of resettlement fraud and, through training, to enhance staff ability to recognize, respond to and prevent fraud. This has been expanded to include concrete management practices related to accountability and compliance monitoring. Development of policies and procedures, creating links with resettlement countries and NGOs and elevating the profile of anti-fraud activities are the other main areas of focus.

<b>UNHCR RESETTLEMENT ANTI-FRAUD PLAN OF ACTION</b> <b>Status report on key activities</b>		
<b>ANTI-FRAUD STRUCTURE</b>	<b>Establishment of a resettlement fraud focal point</b> in the Resettlement Section.	<i>Done</i>
	<b>Establishment of resettlement fraud focal points in Resettlement Hubs</b> whose job it is to coordinate anti-fraud approaches and responses within their area of responsibility and <b>establishment of resettlement fraud focal points in Branch Offices (BOs).</b>	<i>Done for Hubs Partially done for BOs</i>
<b>REPORTING AND RECORDING FRAUD ALLEGATIONS</b>	A single window has been established for reporting fraud or allegations of fraud to ensure that this is centralized within a body mandated to investigate complaints - the <b>Inspector General's Office (IGO), UNHCR.</b> The IGO records and tracks fraud and reports internally. Resettlement Service staff work closely with the IGO on training and other matters.	<i>Done</i>
<b>TRAINING AND AWARENESS RAISING</b>	<b>Development of Training modules on resettlement fraud awareness and prevention; training of staff.</b> Train-the-trainer regional anti-fraud workshops have been designed and delivered in Nairobi, Istanbul, New Delhi and Geneva. Regional training is scheduled for the Americas in fall, 2007	<i>Largely Done In process</i>
	<b>Development of training modules on resettlement accountability and compliance monitoring</b> – this is a key objective for Summer/Fall 2007 and is tentatively piloted in the Middle East given the rapid growth of resettlement programs in that region.	<i>Largely Done In process</i>
<b>DEFINITION AND TAXONOMY</b>	With input from HQs and the field develop an acceptable operational definition of resettlement fraud and taxonomy of resettlement fraud.	<i>Done</i>
<b>POLICY</b>	<b>Development of a policy on sanctions or consequences that can be applied to refugees who engage in resettlement fraud.</b> This policy has been requested by the field that currently impose ad hoc sanctions. A clear policy regarding their authority to exercise sanctions has been developed with input from Policy and Legal Units and is undergoing final approvals.	<i>Ongoing</i>
<b>PROCEDURES AND TOOLS</b>	<b>Ensure offices have developed resettlement SOPs</b> and that anti-fraud checks, and safeguards are integrated into these.	<i>Largely complete</i>
	<b>Self assessment checklist – Office potential exposure to fraud</b> A checklist that consolidates information on systems, procedures, roles and responsibilities so that offices can look at their potential exposure to fraud and take measures as may be appropriate; a non-exhaustive gaps analysis approach.	<i>Done</i>
	<b>Draft a chapter on resettlement fraud</b> to be included in the Resettlement Handbook that expands on accountability and compliance monitoring including best practices.	<i>Deadline: June 2008</i>
	<b>Provide input to the Guidelines and Standards for the use of interpreters</b> that foster an appreciation that the use of interpreters is an activity with a high risk of fraud. Input was made to the process and this now rests in New York for approval.	<i>Ongoing</i>

<b>EXTERNAL LINKS TO PARTNERS</b>	<b>Establishment of Working Group on Resettlement Fraud Prevention</b> including external partners such as resettlement countries and IOM to collaborate on issues. Contacts have been established with a number of countries.	<i>Ongoing</i>
	<b>Joint resettlement process mapping and anti-fraud missions.</b> UNHCR to propose such missions to major resettlement countries. This has been piloted in Kenya with the USA government.	<i>Ongoing element</i>
	<b>Development of a post circuit ride/selection mission report form</b> for the use of resettlement countries to report on key issues including fraud and anti-fraud they may have noted.	<i>Done</i>
	<b>Development and distribution of a form that NGOs in resettlement countries can use to report on resettlement fraud.</b>	<i>Done</i>
	<b>Develop closer links with resettlement NGOs both in the field and in countries of resettlement on resettlement Fraud.</b>	<i>For 2007</i>
<b>COMMUNICATIONS</b>	<b>Mass information campaigns.</b> Numerous messages to Field Offices have included the need to conduct mass information campaigns to inform refugees and asylum seekers about UNHCR services, about the availability of complaint mechanism, and to prevent fraud. Basic messages have been developed. Language for posters and information for brochures has been developed that stress anti-fraud messaging	<i>Done</i>
	<b>Resettlement anti-fraud Bulletin</b> - A bulletin on resettlement fraud will be issued in July or August 2007 jointly by the IGO and the resettlement service. The resettlement service has included information on fraud in previous IGO bulletins and will continue to use this medium to update staff on emerging trends, issues and policy and procedural developments.	<i>Summer / Early Fall 2007</i>
	<b>The electronic resettlement anti-fraud ‘Community of Practice’</b> is a limited access, password controlled virtual office where all resources and references on resettlement fraud / anti-fraud will be stored for ease of access of staff trained in resettlement fraud..	<i>Ongoing</i>

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