

Strengthening UNHCR's System of Accountability

Volker Türk,
Director for Organizational Development and Management, UNHCR

Elizabeth Eyster,
Senior Change Management Officer, UNHCR

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1. Introduction

Accountability is an important principle for UNHCR because of our particular mandate to lead and coordinate international action to protect, assist and find solutions for refugees and other populations of concern. At the same time, it is the scope and reach of this mandate, which in some circumstances overlaps with those of states and other international institutions, that poses particular dilemmas. UNHCR also confronts the same challenges known to all large international organizations. Any system of accountability, to be effective, requires a culture of accountability that is underpinned by a shared understanding of the principle. As an international multilateral organization with an annual budget of USD 1.6 billion, an overall population of concern of 32.8 million and more than 6,600 staff from 151 nationalities working in 262 offices based in 116 countries around the world, how does UNHCR foster a coherent understanding and effective approach to accountability?

The purpose of this paper – currently a work in progress to be presented initially at the March 2009 conference on the *Practical Legal Problems of International Organizations*¹ in Geneva – is to describe the efforts underway in UNHCR to strengthen its current system of accountability. In so doing, the paper will invariably touch upon the many challenges faced by UNHCR, past and present, in arriving at a coherent concept of accountability and infusing the culture of the organization with a stronger sense of and respect for accountability.

2. What do we mean by accountability?

Today, the term accountability is as elusive as it is ubiquitous. It is widely used by corporations and governments as well as the United Nations, international, non-profit and faith-based organizations. A simple internet search of “accountability” generates 28'700'000 hits. But what does it actually mean?

Already, because of UNHCR's multicultural environment, terms such as accountability are a challenge to build a common understanding around. In some languages, “accountability” has no ready-made equivalent. The straightforward French translation is, for example, “responsabilité”² while in Spanish it is “responsabilidad.”

In 2006, a study on UNHCR's organization culture found that: “[a]ccountability is talked about frequently and is one of the greatest concerns of UNHCR staff at all levels, however the concept of accountability covers a number of different issues and it is not always clear that there is a shared meaning.”³

In the legal field, accountability has a well-established but somewhat narrow definition: it is a “principle which requires public authorities to explain their actions and be subject to scrutiny.”⁴

¹ *Practical Legal Problems of International Organizations: A global administrative law perspective on public/private partnerships, accountability, and Human Rights*. Université de Genève, New York University School of Law and Instituto di Ricerche Sulla Pubblica Amministrazione. Geneva, 20 to 21 March 2009

² Other English to French translations of the word “accountability” include “redevabilité” (more closely associated with “liability”) and “devoir de rendre des comptes”.

³ Barb Wigley. *The state of UNHCR's organization culture: What now?* January 2006.

⁴ Andrew Le Sueur's definition of accountability in *The New Oxford Companion to Law*. Oxford University Press. 2008.

Generally, it “involves either the expectation or assumption of account-giving behaviour.”⁵ In other words, accountability is a means to honour trust, to prevent the abuse of power, to uphold standards and to enforce norm-conforming behaviour.

Increasingly, other fields – such as the social sciences – have sought to “modernize” the principle of accountability by adopting a more benign, universal meaning. Organizational management experts argue that a purely punitive, “command and control” application of accountability ultimately weakens an organization’s culture of accountability. As per one management consultancy: “... most people view accountability as something that belittles them or happens when performance wanes, problems develop or results fail to materialize.”⁶ According to another: “... if you are using accountability in response to a mistake or problem, it is too late.”⁷ Accountability within an organization is driven by a global vision of the results the organization aims to achieve. Organizations will be more effective – more accountable – if individuals perceive themselves as valuable members of a team working towards a common goal or result. As such: “...accountability means that people can ‘count on one another’ to keep performance commitments and communication agreements.”⁸

The so-called “accountability revolution” has also spread to the humanitarian field where recently established entities such as the Humanitarian Accountability Partnership (HAP) promote a “responsible use of power”⁹ through participatory mechanisms. An effective system of accountability, according to HAP standards, requires individuals, organizations and states to account for and be held responsible for their actions while at the same time allows individuals, organizations and states to report concerns, complaints and abuses safely and legitimately and to get redress where appropriate. HAP’s humanitarian accountability framework relies on a participatory mechanism which assumes that: “[i]n every humanitarian transaction there is an imbalance of circumstantial power between those able to give help and those in urgent need of assistance.”¹⁰

The One World Trust complements the principles advanced by HAP, adding that accountability is “[t]he processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities, and delivers against this commitment.”¹¹ It comprises four dimensions: “transparency, participation, evaluation, and complaint and response mechanisms.”¹²

Going one step further and equating international institutions like UNHCR with states, Mark Pallis reasons that: “[a]ccountability is essential because it is a means of ensuring more effective protection of rights by providing individuals with the opportunity to seek redress for rights violations. Institutional subservience to human rights entrenches the view that refugees are

⁵ <http://en.wikipedia.org/wiki/Accountability>

⁶ Roger Conners and Tom Smith “Create a culture of accountability” *MRO Today* <http://www.mrotoday.com/mro/archives/exclusives/Accountability.htm>.

⁷ Mark Samuel. *The accountability revolution*. Facts on Demand Press. 2001.

⁸ *Ibid.*

⁹ <http://www.hapinternational.org/pool/files/what-is-an-accountability-framework.pdf>

¹⁰ HAP International *The Guide to the HAP Standard: Humanitarian Accountability and Quality Management*. Oxfam GB for HAP International. 2008

¹¹ Monica Blagescu, Lucy de Las Casas and Robert Lloyd. *Pathways to Accountability; A short guide to the GAP Framework*. One World Trust. 2005.

¹² *Ibid.*

possessed of inalienable rights. This better their status before the law and puts all their interactions with the UNHCR on a more level playing field.”¹³

As explained in more detail below, the dependency by populations of concern on humanitarian action and international protection creates a situation of power that requires a corresponding system of checks and balances. This needs to be balanced with the obligation of organizations like UNHCR to account for the use of financial, political and material means that have been put at their disposal by states.

Bearing in mind its various dimensions, accountability is defined by UNHCR as *a commitment to deliver results for populations of concern within a framework of transparency, agreed feasibility, delegated authority and available resources*. Correspondingly, UNHCR’s aim is to build a modern system of accountability that is sufficiently robust and comprehensive to respond to the different accountability requirements expected of today’s international multilateral organizations. While ultimately guided by a results-orientation, this system will continue to rely on mechanisms that ensure a responsible use of the financial, political and material means provided to UNHCR as well as the authority invested in the organization and its individual staff members.

3. To whom are we accountable?

3.1 UNHCR’s mandate and ensuing accountability considerations

Starting with UNHCR’s mandate responsibilities and its specificities as an international institution, it is possible to discern three overarching dimensions of accountability inherent in UNHCR’s work.

The activities that UNHCR is required to carry out for categories of persons of concern¹⁴ are set out both in the Statute¹⁵ and in subsequent General Assembly and ECOSOC resolutions. UNHCR is primarily mandated to provide international protection and humanitarian assistance and to seek permanent solutions for persons within its competence.

The functions of UNHCR have expanded considerably over time. Mandated activities include preventive action and participation “at the invitation of the Secretary General, in those humanitarian endeavours of the United Nations for which the Office has particular expertise and experience.”¹⁶ In addition, the institution of “good offices” and the right to humanitarian initiative have been useful tools for situations outside mandated activities. Other functions would, for instance, include relief distribution, emergency preparedness, special humanitarian activities, broader development work, and issuance of documentation for persons falling under the mandate.¹⁷

¹³ Mark Pallis. “The operation of UNHCR’s accountability mechanism” *The New York University Journal of International Law and Politics*. Vol 37, 2006.

¹⁴ That is, refugees and asylum-seekers; stateless persons; returnees; and under certain conditions the internally displaced.

¹⁵ Statute of the Office of the United Nations High Commissioner for Refugees, paragraphs 1, 8, 9 and 10.

¹⁶ General Assembly resolution 2956, paragraph 2.

¹⁷ Volker Türk. “Freedom from fear: Refugees, the broader forced displacement context and the underlying international protection regime.” *Globalization, migration and human rights: international law under review*. Geneva Academy of International Law and Human Rights. 2007

UNHCR's action is therefore multifaceted and often based on different legal foundations, ranging essentially from operational human rights work to the distribution of relief items. At the same time, the funding of UNHCR's activities hinges largely on contributions from governments, and only a small portion of UNHCR's budget comes from the assessed contributions of the United Nations. This latter aspect clearly establishes a need for an accountability concept towards those governments providing these financial contributions. This is undertaken through formal mechanisms of UNHCR's Executive Committee process but also in bi- and multilateral donor relationships.

A second aspect of accountability is related to UNHCR's international legal position as representing populations of concern on behalf of the international community. The legal position of UNHCR is unique in that it exercises international protection for refugees and other populations of concern. The Office represents refugees on behalf of the international community and, as a result, exercises in effect quasi diplomatic and consular protection for them – this particular aspect is the historical rationale behind and the very essence of the concept of international protection. Yet, the main responsibility for safeguarding the rights of refugees lies with states, not least because of the fundamental responsibility of states to guarantee the human rights of everyone (including non-citizens) subject to their jurisdiction and within their territory.

The role of UNHCR is to ensure that governments take the necessary action to protect refugees within their territory or seeking to enter their territory. This encompasses, inter alia, admission, respect for the principle of non-refoulement and basic human rights, an adequate standard of treatment, as well as the realization of durable solutions. For the internally displaced and returnees, however, the protection responsibility lies squarely with the state, and UNHCR's role is supportive, capacitating and intervening. Accountability in respect of this aspect is exercised primarily in relation to the General Assembly and in budgetary terms to UNHCR's Executive Committee.

A third dimension of accountability that permeates all of UNHCR's work but is particularly apparent in UNHCR's operational activities is related to persons of concern, as well as UNHCR's partners. This is a particularly complex area. Especially in situations of large-scale influx and in countries with limited resources or inadequate protection systems, support and assistance by the international community, in particular through UNHCR, to population groups and affected states has become an important factor to ensure, in practice, the effectiveness of humanitarian action and the protection of people in need.

In some situations, particularly in Africa, the Middle East and certain parts of Asia, the capacity of the authorities to protect and care for refugees and other populations of concern is many times weak or even non-existent. As a result, UNHCR often ends up in a state substitution role, albeit with inadequate means and no control over areas of state power and governance. As Amy Slaughter of Mapendo International¹⁸ has remarked "... the notion of 'state responsibility' (i.e. the principle that governments have primary responsibility for the welfare of refugees on their territory) has become weak in its application, while UNHCR and its humanitarian partners have assumed a progressively wider range of long-term refugee responsibilities, even in countries which are signatories to the 1951 Refugee Convention and which are members of the organization's governing body, the Executive Committee."¹⁹

¹⁸ http://www.mapendo.org/about_mission.cfm

¹⁹ Amy Slaughter and Jeff Crisp. *A surrogate state? The role of UNHCR in protracted refugee situations*. January 2009.

Slaughter continues by pointing out that: “A defining characteristic of the ‘care and maintenance’ model was the extent to which it endowed UNHCR with responsibility for the establishment of systems and services for refugees that were parallel to, separate from, and in many cases better resourced than those available to the local population. In doing so, this model created a widespread perception that the organization was a surrogate state, complete with its own territory (refugee camps), citizens (refugees), public services (education, health care, water, sanitation, etc.) and even ideology (community participation, gender equality). Not surprisingly in these circumstances, the notion of state responsibility was weakened further, while UNHCR assumed (and was perceived to assume) an increasingly important and even preeminent role.”²⁰

The power relationship resulting from such an operational role of UNHCR has necessitated the creation of guidelines, tools and systems to deliver ultimately on accountability to populations of concern. This is most apparent when UNHCR conducts refugee status determination under its mandate, processes and submits applications on behalf of refugees for resettlement to a third country or manages refugee camps. At the same time, however, it is important to refrain from putting UNHCR on par with states, as done by Pallis,²¹ because this ignores the important distinction between international organizations and states. The latter, in the exercise of sovereignty, provide a safe, secure and stable environment, guarantee the functioning of basic services and protect human rights. The effective exercise of state power and corresponding state responsibilities are, along with people and territory, core defining features of statehood. Such are, however, not the characteristics of an international organization, such as UNHCR.

As shown by Slaughter, there are questions related to UNHCR’s role itself in situations where states do not assume ownership of and basic responsibilities towards refugee issues. It is important to remain realistic in such circumstances and recognize the limits in exercising mandate responsibilities. The Office cannot, and is not meant to, replace whole government structures that would be necessary to protect and assist refugees. For example, UNHCR’s direct exercise of refugee status determination procedures should avoid creating a perception of parallel structures, which states may use to justify disregard of their responsibility to provide protection and durable solutions for refugees.

It is against the background of these three components of accountability that internal organizational management tools for accountability in UNHCR need to be predicated and permeate the fundamentals of the institution. While oversight mechanisms play an important complementary role, it is clear that the most effective solution lies in cultivating a culture of accountability within the organization. The latter is more an issue of change management, raising awareness of important power relationship issues and embedding a strong results-orientation within UNHCR.

3.2 *The issue of authority*

Clarity of roles of individual staff members within UNHCR and their sensitization towards authority issues and power relationships is essential. There is a tendency in large organizations (i.e. bureaucracies) for individuals to assume they have no real authority. Major decisions are referred to working groups, task forces and boards. Policy papers and guidelines often travel through a lengthy clearance process before they are published. Consultations and consensus-building are therefore interpreted as a means to diffuse accountability.

²⁰ *Ibid.*

²¹ Pallis, M.

Organizational management consultants would argue, however, that the consultative process alone does not impair an organization's system of accountability. It is rather the way in which ideas are brought to the working group or task force, and the attitude of each of its members. Again, a results-orientation and commitment to achieving a common goal offer a methodology to strengthen accountability.

At the same time, individuals in an organization such as UNHCR require a better understanding of the authorities that have in fact been delegated to them. Failure to acknowledge these authorities often translates into a failure to acknowledge the accompanying accountability. This is not the fault of individuals, per se, but of the organization's culture that has not gone far enough in empowering its staff and providing them with the necessary awareness, skills and knowledge to discharge their functions and hence their authorities properly.

Bureaucracies run on established hierarchies. Junior staff are accountable to senior staff who in turn are accountable to the organization's direction and management. Authority is delegated from the top, down. Staff lower down in the "chain of command" often perceive themselves as having no authority. But they do. The position of a UNHCR Resettlement Clerk provides a poignant example. This position, in most cases, reports to a Resettlement Officer at a higher grade. As such, a Resettlement Clerk does not have the authority to submit an application for resettlement on behalf of a refugee to a resettlement country. This position does, however, have the authority to determine who, among a group of recognized refugees, can be interviewed for resettlement processing. From the perspective of a refugee, therefore, the authority of a Resettlement Clerk is significant.

We can also take the example of a UNHCR guard, discharging his/her function to protect the organization's premises as well as its staff. A guard does not determine the operating hours of a UNHCR office, or the security protocols. It can therefore be argued that a guard's authority is rather limited. But at the same time, a guard is the first point of contact for anyone trying to enter UNHCR's premises: he/she can decide whether to allow or deny access. From the perspective of a refugee, therefore, the authority of a UNHCR guard is significant.

The issue of authority is where systems of accountability can break down. As such, the need for a clear and coherent mapping of authorities across an organization cannot be over emphasized. Accountability is ultimately strengthened when individuals have a firm understanding of their authorities and how these relate to the organization's goal, and when they receive the requisite guidance and support in exercising their authorities and thus contributing to the organization's goal.

4. *UNHCR's current system of accountability*

UNHCR has a rich set of policies, tools and guidance that make up its current system of accountability. The Code of Conduct and UNHCR's policy on Age, Gender and Diversity Mainstreaming – both introduced in 2002 – have been informed by an organizational awareness of the power relationship that can arise between UNHCR and populations of concern and the potential for abuse. As spelled out by the Code of Conduct in its opening paragraph: "[i]t is recognized that UNHCR's work often puts its staff in positions of power in relation to its beneficiaries. Staff have an obligation not to abuse this power."²² These policies likewise place a

²² UNHCR Code of Conduct. UNHCR/IOM/60/2002 UNHCR/FOM/56/2002: "...the Code of Conduct is designed to foster an organizational culture to which UNHCR staff can be proud to belong, and to help staff understand the kinds of behaviour that are considered abusive or exploitative, no matter whether this

heavy emphasis on refugee participation as a means to strengthen UNHCR's accountability. "Mainstreaming age, gender and diversity means that the meaningful participation of women, girls, boys and men of all ages and background is integral to the design, implementation, monitoring and evaluation of all UNHCR policies and operations."²³

In recent years, UNHCR has also invested in more traditional accountability mechanisms such as the elaboration of an internal financial control framework, regulations governing partner selection and audit certification and a resource allocation framework as well as the establishment of an Inspector General's Office, Oversight Committee and internal audit service (in the Division for Financial and Administrative Management). In the area of international protection, guidelines and standard operating procedures have been promulgated for UNHCR's work with women and children as well as for camp management, the prevention of sexual and gender based violence, refugee status determination and resettlement.

Starting in 2008, UNHCR agreed to participate in a peer review by the Steering Committee for Humanitarian Response (SCHR).²⁴ According to the review's preliminary feedback (January 2009), the organization's abundance of tools and guidelines is both an asset and hindrance. In interviews with members of the SCHR, UNHCR staff complained of being bogged down in paperwork and constrained by bureaucracy. The review furthermore found that UNHCR's "participatory model" is used more systematically by staff during the design of operations, when assessing needs and deciding on the results to be achieved. Populations of concern need to be more engaged in evaluating UNHCR's impact. There was also a sense that UNHCR's staff could benefit from stronger leadership by senior managers and targeted training in participatory methods, particularly with regard to conducting a two-way exchange with populations of concern, managing expectations and ensuring continued transparency. Finally, while UNHCR has established a relatively effective process for reporting and following up on cases of sexual and gender based violence (SGBV), the overall complaints mechanisms available to populations of concern need to be expanded to allow for feedback on all aspects of UNHCR's engagement.

The 2006 study on UNHCR's organization culture provides equally valuable insight on our organization's system of accountability.²⁵ Of particular relevance is the observation that the system is comprised of a number of valuable policies and tools that are not held together by an overarching framework. As a result, accountability in UNHCR is fragmented and altogether less effective.

5. *Towards the future*

UNHCR's system of accountability will comprise two principle and complementary mechanisms: results-based management and the Global Management Accountability Framework. As explained in more detailed below, RBM provides the methodology and tools for UNHCR to enhance its responsiveness to the needs of populations of concern. The Global Management Accountability

behaviour stems from conscious misconduct or ignorance. It essentially spells out what is and what is not acceptable for any person working for UNHCR."

²³ Age, Gender and Diversity Mainstreaming Action Plan 2007 to 2009. UNHCR/IOM/015/2008
UNHCR/FOM/017/2008

²⁴ In addition to UNHCR, the organization's participating in the SCHR peer review, launched in 2008, include: Action by Churches Together (ACT), Care International, Caritas Internationalis, the International Committee of the Red Cross (ICRC), the International Federation of Red Cross and Red Crescent Societies (IFRC), Lutheran World Federation (LWF), Oxfam and the International Save the Children Alliance.

²⁵ Barb Wigley. *The state of UNHCR's organization culture: What now?* January 2006.

Framework, in turn, comprehensively maps accountabilities, responsibilities and authorities across the organization and relates them to the corresponding management policies and guidance. This overarching framework will likewise serve as the backbone for learning in UNHCR.

5.1 Results-based management

Results-based management (RBM) provides a methodology for UNHCR to enhance its responsiveness and thereby its accountability to the populations it serves. Building on multi-year preparatory work, UNHCR is using RBM and its tools as a platform to reaffirm its corporate commitment to achieving the right results in the most efficient and effective manner. Several key initiatives are currently being integrated to bring about the full transition to RBM in 2009: i) the Results Framework; ii) the results-based management systems tool *Focus*; iii) the Global Needs Assessment; and iv) the revised budget structure. Through these interrelated initiatives, accountability is being strengthened because of the emphasis placed on global coherence, transparency, participation, impact and performance measurement and analysis.

5.1.1 Results Framework

The Results Framework provides a standardized and comprehensive description of the results UNHCR wants to achieve. It is an overarching protection-based framework designed to guide the planning process at all levels of the organization. While individual offices retain the flexibility to tailor programmes to the specific needs of refugees and other populations of concern in their region or country, they will now use a more consistent and harmonized language to describe the interventions required to meet these needs. Equally important are the organization-wide standards and indicators that offices will use to measure impact and performance.

5.1.2 Results-based management software (Focus)

Global adherence to the Results Framework is facilitated by new software, *Focus*, which has been entirely designed and developed by UNHCR. *Focus* is an important tool that allows the organization to view updated information at the country and regional level and to generate a global overview for the purpose of strategic analysis. The Results Framework is built into *Focus*, strengthening UNHCR's current capacity to plan, articulate, analyse and measure results being pursued on the micro as well as the macro level. *Focus* will streamline and eventually simplify reporting, while generating greater transparency through more reliable, effective and systematic data collection and consolidation, for the purpose of monitoring and analysing trends, as well as assessing UNHCR's overall performance and impact. In 2009, following a massive roll-out exercise, all UNHCR offices will be equipped with *Focus* and required to use the software to plan, budget and report on their 2010-2011 programmes.

5.1.3 Global Needs Assessment

The Results Framework is further underpinned by a more comprehensive and coherent planning methodology, the Global Needs Assessment (GNA), which is being rolled out jointly this year with *Focus*. GNA builds on various initiatives from the past, in particular UNHCR's Strengthening Protection Capacity Project (SPCP). It is in essence an expression and mapping of the total needs of populations of concern as well as the development of plans and budgets to meet those needs. Importantly, it also allows UNHCR to demonstrate the consequences of unmet needs, as well as to prioritize activities more consistently and predictably across the organization. Solid participatory assessments and collaborate work with populations of concern and partners as

well as a reliance on multifunctional teams are key components of the GNA methodology that will be applied by all UNHCR offices worldwide in 2009.

5.1.4 Revised budget structure

Following last year's approval by the Executive Committee, UNHCR's new budget structure, which goes into effect for the 2010/2011 planning exercise, is being realigned with the Results Framework and organized around populations of concern. The redesign will help generate a more comprehensive and transparent picture of UNHCR's global funding requirements, which in turn will enable UNHCR to ensure a more predictable and equitable distribution of resources across operations.

5.2 Management accountability

UNHCR has shown a longstanding determination to shift fully to a results-orientation. But as commentators have forewarned, RBM is not the "magic bullet" for accountability. As Barb Wigley explains in her study of UNHCR's organization culture: "...RBM is a tool, which if used and implemented well and with consistency, has the potential to assist in moving the organisation forward, but critical still are the people who use it and the priorities reflected in 'results.'"²⁶

UNHCR's RBM software *Focus* enables staff to relate their individual objectives and outputs with those of the operation in which they work. This facility serves to orient and guide teams, and can feed into the overall system of accountability. *Focus*, however, does not relate objectives and outputs with authorities, and as such, does not substitute UNHCR's system of accountability.

5.2.1 Global Management Accountability Framework

UNHCR is putting in place a Global Management Accountability Framework that will map accountabilities, responsibilities and authorities across the organization, from headquarters to regional offices to country offices. Once in place, the Global Management Accountability Framework will signal an important step forward for UNHCR because of its capacity to link – in a single resource – authorities with accountabilities at each level of the organization (country, region and headquarters) and across functions. If furthermore underpinned by a corporate concept of management accountability, the framework will help remedy the current fragmentation of UNHCR's system of accountability. Captured in an online and thus "live" format, the framework will have the advantage of providing managers and staff with both a macro and micro view of accountabilities, responsibilities and authorities (ARAs). The next step will be to cascade ARAs down to the level of work units and positions: terms of reference and job descriptions will follow the same format as the framework and provide a list of ARAs. In putting this framework in place, however, UNHCR will need to exercise caution so as not to transform accountability into a bureaucratic exercise detached from its original meaning and purpose.

5.2.2 Learning

As a means to achieve greater coherence in 2009, UNHCR will consolidate training functions currently dispersed throughout Headquarters into a Global Learning Centre (GLC) based in Budapest. It will link staff training more concretely and consistently with career development and the organization's strategic protection and operational goals. UNHCR will also systematically

²⁶ Wigley, B.

measure the impact of learning on staff to ensure that the approaches used add real value to the organization's performance and that they are regularly adjusted to remain relevant in meeting shifting needs and priorities.

Learning programmes are a longer-term but far more effective means to strengthen UNHCR's culture of accountability. Establishment of the GLC provides a unique opportunity for the organization to review and redesign its global learning programmes and embed, more systematically, the principles enshrined in the Code of Conduct. The opportunity also exists to develop new global learning tools, such as a targeted and mandatory e-learning module on accountability. There are already plans to revise UNHCR's management learning programme, for which the Global Management Accountability Framework will serve as the backbone.

5.2.3 Human Resources reform

While in its first phase, UNHCR's human resources reform has made an important contribution towards safeguarding the integrity of the organization's system of accountability by introducing:

- a whistleblower policy to ensure protection of individuals who report misconduct, provide information in good faith on alleged wrong-doing or cooperate with or participate in a duly authorized audit, inspection, investigation or inquiry;
- an independent and impartial Ethics Office, which reports directly to the High Commissioner;
- the Office of Ombudsman for the resolution of staff-related conflicts; and
- a gender policy and the implementation of related changes to the organization's postings and promotions procedures.

UNHCR has also strengthened its capacity to measure individual and management performance:

- Global Staff Survey: The Global Staff Surveys was administered in 2006 and 2008 and will become a regular exercise in UNHCR. It has thus far served as an important lens for the organization to identify and address vulnerabilities and weaknesses in its management performance. Responses to the survey, for example, have guided the HR reform, resulting in the above-mentioned changes as well as revisions to the performance management appraisal system and UNHCR's postings and promotions procedures.
- Performance Management Appraisal System: In the mid-1990s, UNHCR introduced standardized procedures for evaluating the performance of its staff with the Career Management System (CMS). During the 2006 Global Staff Survey, UNHCR staff expressed dissatisfaction with the CMS, which subsequently underwent an upgrade. A new Performance Management Appraisal System (PAMS) is now set to be launched in April. It is hoped that the electronic Performance Appraisal Document (e-PAD) and an increased reliance on reviewing officers will facilitate a more consistent and widespread use of PAMS alongside regular dialogue and exchange between staff and their supervisors. Core competencies have also been revised to reflect the organization's core values (i.e. integrity, professionalism and respect for diversity) and principles (e.g. client and results orientation and empowering and building trust).

6. *Conclusions*

Accountability is inherently complex for an organization such as UNHCR, given the various operational settings in which our work is carried out, ranging from monitoring compliance with international protection instruments, determining refugee status, running camps, responding to the needs of those living in urban settings, etc. The diversity of UNHCR's operations, staff and stakeholders necessitates a comprehensive and at the same time flexible system of accountability that is guided by an overarching results framework and remains focused on our responsiveness to populations of concern.

As shown through this paper, the content of UNHCR's system of accountability is ultimately in place but will continue to require an overarching framework, corporate vision and commitment. It will also demand a strong emphasis on learning, particularly with regard to the importance of the power relations that exist between the organization and those it is mandated to serve. At the end of the day, it is the dedication, commitment, compassion and awareness shown by UNHCR's staff that is the best guarantor of accountability.

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