

A SURVEY OF COMPLIANCE WITH UNHCR'S POLICIES ON REFUGEE WOMEN, CHILDREN AND THE ENVIRONMENT

**Evaluation and Policy Analysis Section
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SCOPE OF THE REVIEW

This survey examines UNHCR's efforts to comply with priority policies in the fields of refugee women, refugee children, and the environment. At a time when the Change Management Process has sought to provide the Office with measurable goals for its action, an analysis of achievements and shortcomings in these key areas seems particularly relevant.

In conducting the survey, relevant documents and reports were reviewed and a broad range of UNHCR staff at all levels in headquarters and the field were interviewed (the latter by telephone). These included discussions with Special Co-ordinators, regional policy officers and focal points with specific responsibilities in the three policy areas.

Interviews and discussions focused on the issue of compliance with the policies, rather than the substance of policies or programmes themselves. They therefore sought to ascertain the adequacy of dissemination, if and how the impact of the policies are measured, what tools are available for ensuring observance, as well as what impediments stand in the way of compliance.

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OVERVIEW

Compliance is an ongoing concern, but there are still shortcomings

1. Compliance with priority policies on refugee women and children, and environmental affairs has been an ongoing concern in UNHCR for some time, but despite the considerable progress that has been made in these areas, those responsible for the implementation of the policies continue to identify important shortcomings.

2. These deficiencies are largely due to a lack of clearly defined and measurable objectives flowing from the Office's global and strategic policy statements regarding women, children and the environment. Clearer goals and accountability are therefore prerequisites for fuller compliance with the priority policies, but this can only be achieved if there is a renewed commitment by senior management to the issues and policies concerned.

3. Regional Bureaux Directors and Country Representatives also have a clear responsibility for ensuring that policy priorities are understood and implemented as part of multi-year regional strategies. Both at headquarters and in the regions, inadequacies in the areas of policy formulation and dissemination, programme monitoring, reporting, and lack of operational flexibility are often responsible for failures to comply with policy goals.

4. Given the strong interest in the international community for these issues, targets need to be both forward-looking and set as high as possible. Acceptable levels of compliance need to be defined, and concerned staff must be made accountable for reaching them. At present, many UNHCR staff-members do not have a clear understanding of what it means to comply with the various policies, even though most agree on the importance of the issues. Indeed, policy compliance is often a function of the staff's goodwill rather than established accountability.

Specialised staff play an important role

5. While attainment of policy goals clearly remains in the domain of the Regional Bureaux, a number of posts have been created with specific responsibilities related to the priority policy areas. These include the Senior Co-ordinators, currently located in the Division of Operational Support (DOS). Regional Policy Advisors for Refugee Women and Refugee Children have been out-posted at the regional level. There are also focal points for refugee women and refugee children at headquarters as well as in the field. All have important parts to play in achieving policy compliance. There is nonetheless a need for systematic consultation and co-operation between the Senior Co-ordinators and the Regional Bureaux and other staff directly involved in both operations and international protection, so that all concerned have a clear understanding of each other's roles, functions and actions.

6. Senior Co-ordinators have been active in the identification and mustering of external resources in the priority areas. This function is vital, as without the necessary resources it will not be possible to mainstream these policies and ensure that refugee women, children and environmental concerns are adequately addressed. Indeed, one of the major difficulties in achieving compliance is that a regular flow of funding for these projects cannot always be guaranteed.

Staff perceptions of compliance vary

7. Policy compliance cannot always be measured in purely quantitative terms particularly in the important area of protection of refugee women and children. In the absence of standard indicators, the degree to which UNHCR's policy goals are being attained is a subject of varying interpretations among staff directly concerned, even if the majority are convinced that a certain degree of compliance does take place. In this regard, staff in the field tend to be more satisfied with policy compliance than those at headquarters. Staff in Regional Bureaux or operations are usually more positive than those in the divisions. Finally, staff specially concerned with policy in the areas of refugee women, children and the environment are the least convinced that UNHCR is reaching its objectives in their areas.

Policy communication needs to be improved

8. The issue of policy formulation and dissemination throughout the organisation is one of the most persistent difficulties referred to by staff at all levels. Many staff members feel overwhelmed with the huge volume of policy related texts and the sheer number of non-standardised manuals, guidelines and directives in UNHCR. The need for a single set of new programme development guidelines, that would integrate the key lessons of the existing guidelines, therefore remains a priority task for UNHCR management.

9. Various reporting requirements act as catalysts and should lead to higher levels of compliance. These include special instructions and requirements in the preparation of Country Operation Plans, Standing Committee Reports and annual Protection reports. Country Operations Plans, for example, include requirements "to integrate priority policies issues throughout planning, budgeting and delivery of protection and assistance programmes...". Through these requirements, field offices are required to provide statistics on these issues and more precise information on activities.

Reporting on protection needs new focus, and reports to EXCOM should provide more detail on priority areas

10. Recent annual protection reports have lacked sufficient focus and detail on protection concerns related to women and children, and cannot serve to measure compliance in their present form. In the future these reports will hopefully include fuller accounts of problems and follow-up actions related to women and children, under revised reporting requirements being prepared by the Division of International Protection

11. Although standard instructions for the preparation of annual Executive Committee and Standing Committee reports require inclusion of information on efforts on behalf of women,

children and the environment, recent reports give insufficient attention to this requirement, and there is little indication of whether or not these policies are being prioritised or how they are being mainstreamed.

12. Other tools which can be used for assessing compliance, and which could be used more effectively in certain instances, include special reports, studies, evaluations, inspection and audit reports. A useful initiative has been taken in this regard by the Environmental Affairs Unit, which is planning a comprehensive review of related activities in the near future. The review will hopefully enable the Unit to assess the actual degree of compliance with UNHCR's environmental policies and guidelines.

Training and mass information can also play their part in priority areas

13. Insufficient human resources specifically trained in the priority issues is another recurring impediment to policy compliance. Training as a means of encouraging and stimulating effective action in the priority areas of compliance therefore deserves particular attention. Without the relevant skills, understanding of the issues, and knowledge of how to function within the Organisation's structure, staff cannot be expected to achieve the objectives fixed in policy statements. Clearly, however, if it is to be useful in generating compliance with priority policies, training should be focused on these issues, participants carefully selected, and follow-up systematic.

14. Mass information or mass communication campaigns can also potentially be effective tools for promoting compliance with organisational policies. Such campaigns aimed at refugees and at times local communities and local partners, may serve as vehicles for the broad dissemination of policies, guidelines and instructions. They may usefully complement internal dissemination and compliance mechanisms by preparing the persons of concern to UNHCR for the activities planned for their benefit.

Policy compliance and mainstreaming

15. Clearly it would be highly desirable to fully integrate the priority policies on refugee women, children and the environment with the mainstream of UNHCR's activities, and develop long-term strategies on their behalf. This would be the best indication that the Office is committed and able to deal with any and all aspects of these important issues, with the full backing and engagement of staff at all levels.

16. At present, although attention has been increasingly focused on these crucial policy concerns, compliance with the priority policies has not yet reached the levels desired. Thus, while mainstreaming should remain the long-term goal, efforts on behalf of refugee women, children and the environment remain fragile and should continue to benefit from special attention.

17. Furthermore, it is apparent that efforts to comply with these policies have been more widely adopted and are relatively more successful in the area of assistance than in the protection field. There is a lack of accumulated lessons and best practices on which those working with protection and rights issues can draw. The Organisation should therefore focus more attention on the protection aspects.

18. Finally, it must be recalled that past evaluations of these issues have repeatedly emphasised the importance of senior management commitment in achieving the priority policy goals. UNHCR's new structure, with its Department of Operations, would appear to provide an excellent framework for ensuring compliance through the Regional Bureaux, which remain the key to full adoption of these policies.

RECOMMENDATIONS

Recommendation 1

The AHC should direct the Regional Bureaux to identify the highest priority concerns relating to these three policy areas and develop regional strategies and multi-year plans of action as part of the Country Report and Operations Plan (CROP) exercise.

Recommendation 2

Drawing on regional priorities and strategies outlined in recommendation 1, Directors of Regional Bureaux should in turn direct each country office to develop plans with specific objectives along with criteria and indicators for measuring progress. To the extent possible, these should be incorporated into the regular programming cycle.

Recommendation 3

The Senior Co-ordinators should assist and advise the AHC and Regional Bureaux Directors in determining overall priorities and plans. In the field, senior advisors for women, policy officers for children, and staff and consultants dealing with environmental issues should support and advise in the development of country and situation level plans.

Recommendation 4

In developing country level strategies and plans, heads of office need to be centrally involved and accountable for ensuring that the country staff responsible for protection, programme, and community services as well as regional policy personnel are brought together to address these key policy issues.

Recommendation 5

To encourage mainstreaming and ensure greater accountability in implementing these critical issues, the Division of Operational Support should revise the annual programming instructions and reporting requirements in a way that integrates women, children and environment policies into all relevant aspects of operations rather than confining reporting to a few sectors such as community services.

Recommendation 6

Senior Co-ordinators and their regional staff should also take an active role in monitoring, assessing and reporting on compliance in a clear and systematic manner that will:

- a. identify key regional concerns and develop strategies that will address these needs; and,
- b. permit senior management to flag problem areas and assess progress.

Recommendation 7

In addition to the duties detailed in recommendation 6, the co-ordinators' internal role should also consist of : a catalytic support role regarding special regional initiatives, and participation in working groups and committees as required. The co-ordinators' external role should include : advising governments, representing UNHCR at external meetings, helping to galvanise inter-agency initiatives and partnerships, and mobilising adequate financial resources to support field-based initiatives related to these policies.

Recommendation 8

The cross-cutting nature of the co-ordinators' task continues to confound efforts to identify the optimal organisational placement and reporting lines as well as efforts to group policy support activities. While it is recognised that these key roles should evolve according to needs and progress in mainstreaming, several principles should nevertheless guide the organisational placement of the co-ordinators. These include:

- a. having direct access to senior managers; and,

- b. having influence that cuts across functional lines.

Recommendation 9

To improve policy dissemination, policy co-ordinators and their field personnel should :

- a. actively participate in policy and technical workshops; and,
- b. intensify their efforts to develop new more simplified and condensed materials that are readily comprehensible and easy to apply.

Recommendation 10

To strengthen accountability,

- a. Directors of Bureaux and field offices should direct supervisors to devote particular attention to applying individual performance evaluation competencies related to these priority issues (these competencies were recently revised and strengthened but have not yet been applied); and,
- b. at the country level, inspection and Department of Protection oversight missions should place greater emphasis on reviewing progress in implementing regional priorities and country plans relating to these issues.

I. FORMULATING POLICY AND TRANSLATING IT INTO ACTION

Background

19. Meeting the particular needs of refugee women and children, and mitigating environmental damage caused by large refugee groups, have become increasingly high priority policy issues for UNHCR over the past several years. Considerable resources, both human and material, are mobilised to address these special areas. Numerous instructions and guidelines have been issued with a view to defining priority policies and translating them into practice at all levels of the Organisation.

20. Already in 1993, the "Review of the Implementation and Impact of UNHCR's Policy on Refugee Women" undertaken by the Central Evaluation Section, highlighted a number of factors inhibiting compliance. These included limited or distorted understanding of the policy among staff, the lack of accountability, and above all the need for a renewed commitment by senior management. A 1997 "Evaluation of UNHCR's efforts on behalf of children and adolescents" made similar comments. A very recent publication on "Refugee Operations and Environmental Management – Selected Lessons Learned" (August 1998) stressed that "Environmental concerns are... an integral part of overall humanitarian assistance..." and called for "mainstreaming environment into general refugee operations and fund-raising programmes".

21. Despite the fact that significant efforts have been made to render UNHCR's action on behalf of refugee women and children and the environment more effective, significant shortcomings continue to be identified by senior staff directly concerned with these issues, as well as by NGOs, governments and human rights groups.

Defining policy

22. The term "policy" has been defined by the UNHCR Project Delphi Working Group on Policy Formulation and Dissemination as "a set of higher, universally applicable, and mandatory guiding principles". The Working Group underlined the "constraining character of policy guidance".

23. The basic policy statement for UNHCR is the Statute adopted by the United Nations General Assembly in 1950, which gives broad powers to the High Commissioner in his or her search for solutions to refugee problems. Numerous subsequent General Assembly Resolutions have extended the Office's role into areas which were not originally envisaged. The Conclusions contained in the annual report of the UNHCR Executive Committee, ratified by the General Assembly, become part of this body of resolutions.

24. It is only in fairly recent times, however, that specific categories of persons, such as women and children, or issues of global concern such as the environment, have been singled out by the Executive Committee and the General Assembly. Given the keen interest in the work of the Office, both among governments and NGOs, as well as various interest groups, the media and the general public, these issues have assumed major importance for the High Commissioner in

determining global policy strategies for the work of the Office, within the framework of her Mandate.

25. It follows that the Executive Committee has an important role to play in policy formulation and legitimate expectations regarding policy compliance. The Executive Committee and its Standing Committees generate various reporting requirements, as do country and regional reports, and particular sessions on protection of refugee women and children.

Policy must not only be known and understood, but also acted upon

26. Policy guidance as it is disseminated throughout the organisation is in principle binding and calls for mandatory action, but this principle is not always understood by the staff. Indeed, many staff members apparently consider that only instructions or guidelines which include a feedback mechanism are mandatory, the others being merely advisory. Follow-up on policy has therefore often depended on whether or not instructions contain an explicit reporting requirement. This lack of understanding among UNHCR staff on what it means to comply with various policies is therefore key to any discussion on whether organisational policies are effective or not.

27. UNHCR has a number of different ways of disseminating policy directives. Foremost among these is the Inter-Office Memorandum/Field Office Memorandum (IOM/FOM). In addition, there are various compilations of guidelines, which are often complemented by leaflets, booklets, posters, panels of text and photographs. Policy is also disseminated orally, in briefings, meetings, seminars and working groups, usually accompanied by printed materials

Dissemination does not in itself guarantee policy compliance

28. It cannot be assumed, however, that policy is implemented simply because it has been formulated and disseminated. Furthermore, even when measures are implemented which conform to a policy, one cannot automatically assume full compliance. The principles which make up the policy may have been respected and acted upon, but in the absence of precise indicators to measure compliance, and thresholds for each policy, performance cannot be adequately assessed.

29. Various intermediate levels, or implementation relays, also intervene between the decision- or policy-making centre and the operational end, and must function smoothly in order to ensure policy compliance. These include Regional Bureaux, Desks and other regional structures, as well as the Senior Co-ordinators for each of the special policies, and their counterparts in the field, the Regional Co-ordinators and Policy Advisors. The promotional efforts of the Senior Co-ordinators clearly play a key role in formulating and stimulating action in the priority areas.

30. A number of management tools and reporting requirements also can act as catalysts and lead to higher levels of compliance. These include special instructions and requirements in the preparation of Country Operation Plans, Standing Committee Reports and annual Protection reports. These requirements do not, however, necessarily permit measuring policy compliance in quantitative terms. Nor does the fact that funding is obtained and used for given activities necessarily constitute full compliance with the policies, even if it does reflect concern for the issues.

31. Use of polling and questionnaires to measure compliance has been attempted, but the results remain inconclusive. It would appear that such methods, even if developed on solid statistical analysis, remain subjective. For example, the office of the Senior Co-ordinator for Refugee Women issued a questionnaire in August 1997 but, although a large number of replies were received, the information gathered was considered inadequate for measuring policy compliance

Setting the highest acceptable levels of compliance

32. Clearly the acceptable levels and thresholds of compliance with the priority policies should be high. In this respect, standards set not only by UNHCR itself but also by concerned sectors of the international community must be taken into account. These include the Executive Committee, which has particular expectations regarding policy compliance, and many different groups with substantial influence over government processes.

33. Legal standards, both national and international, also provide a framework for the Office's action in the priority areas. Such issues as the legal status of refugee women and children, for example, fall within the domestic jurisdiction of sovereign states. So do questions of conservation of the environment

34. Likewise international law governs many aspects of conduct towards women and children in general, and those affected by armed conflict in particular, as well as environmental management and sustainable use of natural resources. These issues are defined in a wide variety of conventions, protocols, declarations, as well as in the law and practice of States and international organisations. Thus these instruments also constitute an important source of

norms which require compliance, as do a variety of other sources of international law, such as declarations and draft instruments, even if they are not legally binding. Given its widespread ratification, for example, the Convention on the Rights of the Child is especially relevant.

Compliance has improved, but progress is uneven

35. There has nonetheless been an evolution in compliance with the three priority policy areas over a period of time. This is particularly evident at the field level, where staff are more convinced they are achieving policy compliance than are those at headquarters. It is apparent, however, that this often depends on the goodwill of staff rather than a sense of obligation.

36. Indeed the majority of field staff are well aware of the policies, and usually consider that these issues are adequately addressed through conventional assistance programme activities, provided basic needs are covered. At headquarters, staff in Regional Bureaux or those dealing with operations are, for their part, generally more satisfied with the degree of compliance than those in other sectors.

37. Staff specifically concerned with policy in the areas of refugee women, children and the environment are the least satisfied with the degree of policy compliance in their areas. This could be in part explained by the more theoretical approach to be found at headquarters, as compared with the "hands on" approach of staff working in the field. It also may reflect different understanding of the nature of the policies as well as inadequate feedback.

38. These differences of approach sometimes depends on whether the staff members are more assistance or protection-oriented. The former tend to consider that women and children's concerns are by and large being covered through the provision of basic food, shelter and medical assistance. They seem to be less aware than their counterparts in protection that UNHCR's policies on refugee women and refugee children are grounded in international protection and human rights instruments. Protection-oriented staff, on the other hand, are well aware of UNHCR's policies on refugee women and children, and they stress the need for operational responses to human rights violations, as well as the provision of basic assistance programmes.

39. As regards environmental policies, the level of compliance has progressed significantly, as illustrated by the recent major efforts made in the Great Lakes region of Africa. The importance given to environmental management nonetheless varies from one refugee situation to another, and too often action is only taken when host governments and communities complain about environmental degradation caused by refugees. There is also a need for clearer indicators of what constitutes policy compliance in this area.

Mainstreaming policy compliance requires measurable goals and accountability

40. It is evident that there would be major advantages in integrating the priority policies with the mainstream of UNHCR's activities. Mainstreaming implies applying policies across the board as part and parcel of all aspects of the organisation's work. It therefore requires that global objectives be defined and targets set for the priority areas in the same way as they are for any other of the activities of the Office. Once staff are made aware of these objectives, sensitised to the needs and their identification, and informed of the means to be used to reach the strategic goals, they can also be held responsible for performance. Achieving the mainstreaming of issues related to refugee women, children issues and environmental affairs would therefore, at least in theory, mean that the Organisation is fully equipped to deal with any and all aspects of these issues. Clearly, despite the progress achieved, this goal has not yet been reached in UNHCR.

II. CURRENT EFFORTS TO PROMOTE COMPLIANCE WITH PRIORITY POLICIES

Senior Co-ordinators and their field counterparts support compliance

41. In operational terms, attainment of UNHCR policy goals lies clearly in the domain of the Regional Bureaux. In addition, a number of posts have been created in recent years with direct responsibilities related to the priority policy areas of refugee women, refugee children and environmental affairs. These are the functions of Senior Co-ordinators, until recently located at headquarters in DOS, as well as Regional Policy Advisors for Refugee Women and Refugee Children, located in the various regions. At Headquarters as well as in the field, there are also focal points for refugee women and refugee children. Field environmental co-ordinators have also been appointed in specific situations.

42. The fact that the Programme Policy Unit, where the Senior Co-ordinators were based for administrative purposes, had not been given a clearly defined and understood role, was perceived by some as complicating working relationships in the past. The ability of the Senior Co-ordinators to cut across institutional lines in order to pinpoint problems and needs in their fields of expertise is clearly an advantage and should be retained, provided there is fluid

communication between the Senior Co-ordinators' units and the Bureaux, as well as the Department of International Protection

43. The responsibility of the Senior Co-ordinators to provide internal operational guidance, including skills transfer, needs to be clarified and reaffirmed. An increased presence in the field, visiting refugee sites and bringing support to field staff on how to translate global policy into operational guidelines, would be welcomed by many staff.

44. The Senior Co-ordinators also have an important role to play in the preparation of various programming instruments such as Country Operations Plans (COPs) and Letters of Instruction (LOIs). Respect for their input in these basic operational tools is another way of ensuring that priority policy issues are integrated in all action plans.

45. Senior Co-ordinators have in the past been active in the identification and mustering of external resources to meet critical concerns and fill gaps in programmes in their respective areas. Care is needed, however, to ensure that if funds are raised by the Senior Co-ordinators for particular projects in their respective areas, core programme elements do not suffer from under-funding.

The role of networks and regional staff requires attention

46. The networks of focal points for priority policies compliance clearly have great communication potentials. They can relay information swiftly to the most extended links in the organisation's programme chain. Unfortunately, these networks appear to have suffered from lack of mainstream managerial commitment, and the focal point responsibilities are perceived as marginal by most staff-members and focal points themselves.

47. Thus several years after their introduction, apart from the positive experience of the Americas, focal point networks have largely become a fiction to which fewer and fewer staff-members are committed. It is therefore sometimes suggested that focal point responsibilities could be incorporated into functional job descriptions, thus encouraging staff to allocate part of their work time to these efforts. Consideration could also be given to alternative systems such as teams or task forces, including UNHCR-NGO resource teams and partnerships.

48. In the area of environmental management, it has been observed that efforts to mainstream these issues have sometimes been hampered by the fact that the field co-ordinators are for the most part national staff, UN Volunteers or consultants, who lack sufficient influence over operational policy. The deployment of higher-level staff to support regional environmental efforts in the field has been suggested as a way of enhancing policy compliance in this important area.

Policy staff can provide useful support

49. The addition of Regional Advisors for Women, although sometimes seen as an additional layer between the field and headquarters, is clearly a positive development. While some degree of tension is perhaps inevitable between such staff and personnel responsible for operations, this can be anticipated and overcome with positive benefits to country programmes.

50. A particularly successful model is the creation by the Senior Regional Adviser, Refugee Women, for the Americas, of a Regional Gender Team, with participation of all offices in the region. The team, which drafted its own terms of reference and criteria for the selection of members, monitors refugee women's issues, identifies problems and communicates proposals for remedial actions to staff-members in the concerned areas.

51. The team includes field operations managers, thus ensuring their support. The team system combines, through co-optation, the proactive character of an operational task force, and the policy compliance mission devolved upon the regional priority policy officers. The positive results of this approach could well be replicated in other regions.

Endorsed plans could increase commitment

52. Strategic plans of action regarding policy areas that are endorsed by management are viewed as essential elements that are long overdue. Although plans have been developed and guide work in the policy areas, they have yet to be fully endorsed by UNHCR's senior management. It is evident that endorsement would facilitate implementation, further understanding and increase commitment.

53. A key recommendation of the 1997 joint evaluation carried out by UNHCR and the Save the Children Alliance was the development of a strategic plan. Consequently, the plan was developed by the coordination and efforts are underway to implement it. Regional posts have been created, training instituted, and NGO partnerships developed. Nevertheless, the plan has never been fully endorsed by UNHCR's senior management.

Environmental issues are also mainstream concerns

54. Environmental concerns have a less direct impact on refugees than questions of protection and assistance and it is often difficult for UNHCR staff and implementing partners to understand

that they, too, are priority issues. This is particularly true in emergencies, when staff in the field are fighting to save lives. It is in such situations, however, that refugees are particularly dependent on natural resources for their basic needs such as drinking water, shelter materials and firewood.

55. At the same time, recent experience has shown that conflicts between refugees and local populations over scarce natural resources may result in host governments' unwillingness to accept more refugees. Thus proper environmental management is not only in the interests of the refugees, but also a basis of continued support from host governments and communities. These factors clearly militate in favour of continued efforts to mainstream environmental concerns.

III. COMMON PROBLEMS IN ACHIEVING POLICY COMPLIANCE

Formulating and disseminating policy

56. One of the consequences of the way policies are formulated and disseminated at present is the sheer number of non-standardised manuals, guidelines and directives in UNHCR. Many staff-members feel overwhelmed with the volume of policy-related texts. This results in confusion over which guidelines prevail and where there are to be found. In the absence of a consistent dissemination strategy, it cannot be assumed that every staff-member has had access to policy and guidelines.

57. A single set of new, integrated programme development guidelines, would undoubtedly contribute significantly to the effective dissemination of policy and enhance compliance. In this regard, the OMS working group has been developing a Policy Library, which could be a useful tool in preparing this document. Senior Co-ordinators have been providing input with respect to issues related to their fields.

58. In addition, as recommended in the 1997 children report, it has been proposed that checklists should be prepared. Since even improved guidelines are bound to be voluminous, a brief document encapsulating in a readable fashion "what every staff member should know about refugee children and adolescents" could also be envisaged and distributed both to staff and implementing partners.

Project planning and needs assessments

59. Another key factor concerns the lack of detailed information that would permit clear assessments of needs and objectives in the priority areas. The December 1997 Report of the Board of Auditors to the General Assembly is significant in this regard when it states: "Lack of adequate sex/age disaggregated statistics was a constraint in proper needs assessment on which plans for implementation could be based"

60. The gathering of such information would therefore be a first step towards establishing objective goals for measurable policy compliance. The next step would be to control performance through strict monitoring according to established criteria. In other words, policy compliance can only be achieved through clearly defining expected accomplishments and at the same time spelling out the binding character of each policy.

61. When it comes to operational planning, needs assessments should normally include a breakdown of the target-population by age and gender, and describe the context, including environmental concerns. Priority policy guidelines are not, however, consistently utilised to identify core problems, causes and effects, and to establish project objectives, activities and impact indicators.

62. Even when key issues have been identified, the absence of clear impact indicators (for instance, x % of school-aged girls and boys in y refugee situation will attend school on a regular basis) is a handicap to establishing impact benchmarks. This shortcoming will hopefully be addressed in the new OMS handbook and through subsequent training efforts. These efforts should not, however, preclude more immediate steps to address this need.

Accountability is indispensable, but should leave room for personal initiative

63. It is also important for the sake of acceptable compliance to integrate in priority policy texts clear indications of the imperative or mandatory nature of the guidelines for implementation. In the absence of accountability, and especially of personal accountability, the difference between imperative guidelines and advisory or elective ones may rapidly become blurred.

64. Other UN organisations, such as WFP, have successfully linked personal accountability with programme delivery. For instance, WFP has required all representatives to ensure that women are key participants in food distribution systems, and to report back on the steps taken.

65. The introduction of accountability measures related to key policies coupled with some form of sanctions, could help to encourage compliance. To implement such measures, there is a need for Bureau Directors and Country Representatives to ensure that policy priorities are

understood as such by all staff serving under them, and that they are implemented across the board. Important steps have been taken. UNHCR has recently revised core and managerial competencies to better reflect prioritisation of policies regarding children, adolescents and women. The next step will be to ensure that the competencies are systematically applied.

Compliance calls for adequate financial and human resources

66. Compliance with priority policies remains tributary to a regular flow of funding. When budgets are critically reduced, priority policies sometimes suffer. It would seem in such cases that policy priorities are not always considered as fully-integrated core functions. Fortunately, this is not always the case. In the Great Lakes Region, for example, where activities have been seriously curtailed, country operations have maintained substantial programmes for unaccompanied refugee children. It must also be recognised that, despite efforts by donor relations staff to maintain the funding flow, contributions for projects in the priority areas are sometimes affected by such factors as shifting priorities in donor countries.

67. Inadequate or insufficient human resources is another recurring problem. Much remains to be done both in terms of dedicating and training staff in priority policy areas. Unfortunately, the limits of UNHCR's presence in the field mean that people often cannot do justice to the priority areas which require particular attention from staff. It is nevertheless encouraging to note that in line with a recommendation of the 1993 evaluation report on refugee women, more interaction has been achieved with local communities.

Cultural factors must be understood

68. Cultural factors are also important, although policy advocates have sometimes expressed scepticism in this connection. Staff in the field, especially in large and isolated refugee sites, contend that promoting compliance with priority policies can in some instances alienate refugee communities and produce tensions that make co-operation difficult.

69. For example, in some areas, children are vital life supports for their families and child-labour is therefore common practice. In other instances, arming children to defend the family, clan or community is seen as quite normal. Communities may react with great suspicion at UNHCR's efforts to divert children from armed activities and even see UNHCR staff as an enemy. The same applies to traditional religious practices, which are sometimes in conflict with what are considered as the best interests of refugee women and children. Mass communication campaigns can be a tool in tackling some of these cultural constraints, but most of these issues are not easily and quickly addressed.

IV. AVAILABLE TOOLS FOR ENSURING PRIORITY POLICY COMPLIANCE

Primary compliance instruments and mechanisms

70. The basic instruments for disseminating policy directives in UNHCR are the headquarters memorandum (IOM/FOM), which in principle is a policy communication of the highest level, and the UNHCR Manual, which is a basic policy reference and collection of principles and guidelines. The IOM/FOM is sometimes criticised, however, on the grounds that its imperative character is diluted because it is used to address a wide variety of issues of varying importance.

71. Both the IOM/FOM and the Manual are intended to formulate principles of strategic or global policy in a manner consistent with the needs in any given situation. It therefore follows that the clearer and more operations-oriented they are, the more effectively the policy will be carried out.

72. It is apparent, however, that not all staff have a clear understanding of the mandatory character of these instruments in determining action in the field. For example, a directive issued by the High Commissioner requested all offices to draw up a plan of action in response to the United Nations Study on the Impact of Armed Conflict on Children. The IOM/FOM indicated plans should, in particular, focus on separated children, adolescents, sexual exploitation, recruitment of child soldiers and promotion of girls' education. While 54 reports were received, 57 field offices did not submit any plan of action. Another seven responded that the directive did not apply to their programme.

73. When queried as to why they had not complied with this instruction, several field offices indicated they thought that such requests were advisory and did not require a response if the issues did not seem relevant to their own operational priorities. Some also considered that headquarters was too far removed to determine policy priorities in their particular situation.

74. If not all staff clearly understand the weight of such communications when they emanate from the highest level in the organisation, even more ambiguity exists regarding IOM/FOMs and Memos sent by the Directors of DIP and DOS, either jointly or individually. It is not clear, at least to some staff-members, whether or not they carry the same weight as those issued by Bureau Directors. Similar doubts concern communications issued by the Head of the then Funding and

Donor Relations Service (FDRS), or the former Programme Co-ordination Section (PCS), or the Senior Co-ordinator for Refugee Children or Refugee Women

75. In addition to the IOM/FOM and the UNHCR Manual, a large number of manuals, handbooks, newsletters, guidelines, checklists etc. are regularly produced by concerned services to assist and facilitate implementation of a wide range of policies. In other words, these tools are meant to "operationalise" UNHCR policy. Their usefulness is widely acknowledged among staff.

76. The sheer volume of this type of material often discourages staff from reading it, however Heads of Offices and Programme Officers simply cannot find the time to read and digest it all. Field offices are often overwhelmed with guidelines which are too general and difficult to adapt to local situations. There is clearly, therefore, a need to prioritise programming instruments, instructions, guidelines, etc., if policy compliance expectations are to be met.

77. Rationalising policy guidance will not suffice, however, if the concerns of refugee women, children and the environment are not re-emphasised and integrated into the formulation of global and strategic policy documents, perhaps with cross references to key operational guidelines. At present, mention of the priority policies in these documents is rare, and this has, albeit inadvertently, widened the gap between strategic objectives and operational priorities.

78. An element affecting full compliance with the priority policies may also be the sheer weight of organisational culture. Given that the emphasis on specific concerns of refugee women and children, as well as environmental issues, is relatively recent, it is not necessarily surprising that it is taking time for the organisation to adapt. Implementation of the revised CMS competencies could nonetheless help staff recognise the importance of these issues and encourage their adoption.

Secondary compliance tools

79. A number of secondary tools for ensuring policy compliance are available, but are not always as effective as they should be. These include programming instruments such as Country Operations Plans. COPs include requirements "to integrate priority policies issues throughout planning, budgeting and delivery of protection and assistance programmes..." Field offices are required to provide statistics on these issues and more precise information on activities.

80. The Office's capacity to monitor policy and seek compliance on priorities has nonetheless been weakened in recent years, according to a number of staff-members. Under the previous Programme Coordination Budget Section system, with the placement of PCBOs within bureaux, there were more structured exchanges on operational concerns, policy priorities and technical standards throughout the programme cycle. While this produced a certain degree of tension between PCBS and the bureaux, it also provided a mechanism whereby relevant staff were more systematically involved in detailed reviews of country plans.

81. With the elimination of PCBOs, PCS no longer has the capacity to ensure these exchanges, and increasingly, bureaux are developing operational plans with little or no reference to compliance with policy priorities, sector-specific standards, and impact indicators.

Reporting and planning instruments

82. Other reporting and planning instruments such as Regional EXCOM-Standing Committee Reports, Protection Reports, the FMIS, and Project monitoring and reporting requirements, also have a function in measuring compliance. The systematic integration of priority policies in these instruments has yet to be achieved, however. For example, the FMIS and specially the FOBS do not feature individual items for priority policies, and thus, activities in these areas cannot be easily singled out and identified.

83. Furthermore, although standard instructions for the preparation of Standing Committee and EXCOM reports require inclusion of information on efforts on behalf of women, children and the environment in each country's operation, most of the recent reports to the Standing Committee have paid scant attention to this requirement.

84. Similarly, annual protection reports show a lack of sufficient focus and detail on protection concerns related to women and children. Hopefully this problem will be soon solved by DIP, which is in the process of revising its instructions for annual protection reports to include fuller accounts of problems and follow-up actions related to women and children.

85. Many staff involved in operations find it difficult to provide information about budget allocations related to women and children. Part of the problem may be that the FMIS system does not easily allow for clear budgetary delineation and reporting on specific refugee women's and children's concerns. The establishment of specific at-risk women and at-risk children categories, under protection as well as community service and education headings, could help. Special reports, studies, evaluations, inspection and audit reports

86. Special reports, studies, evaluations, inspection and audit reports could also be used more systematically as sources of information on policy compliance. This has been recognised by the Environmental Affairs unit, which is carrying out a comprehensive review of activities in its area. The review will enable the unit to assess the actual degree of compliance with UNHCR's environmental policies and guidelines.

87. Evaluations can also help to renew emphasis on policy areas. It is noteworthy that at least two recent evaluations (Review of the Implementation and Impact of UNHCR's Policy on Refugee Women, 1993 and Review of UNHCR's Women Victims of Violence Project in Kenya, 1996) have examined in detail the issue of compliance with UNHCR's refugee women policies and are generally considered to have helped in advancing these issues.

88. Similarly, a study entitled An Evaluation of UNHCR's Efforts on Behalf of Children and Adolescents, 1997, reviewed systematically the organisation's compliance with refugee children policies, and an evaluation on education was undertaken in 1996-97. As for environmental affairs, a review of UNHCR's rehabilitation activities in the Great Lakes Region also examines examples of the organisation's compliance with its environmental policies.

89. It is important to recall in this regard that the 1993 Evaluation on Refugee Women attributed the advancements made in improving activities for refugee women to the work of the Senior Co-ordinator, Senior Advisors and other specialist staff. Already at that time, however, it had remarked on the need to clarify roles and responsibilities, as well as more importantly to ensure the commitment and accountability of staff members at all levels of management.

90. The evaluation covering Refugee Children arrived at similar conclusions. Full implementation of the recommendations also proved elusive. The evaluation was discussed several times by the Senior Management Committee and a number of recommended improvements have taken place. Nonetheless, one of the most important recommendations, aimed at establishing an SMC-endorsed plan of action to mainstream these concerns, has remained in abeyance.

91. Since their inception three years ago, inspections have systematically examined policy compliance and related issues. Inspection staff have developed, with the help of the Senior Co-ordinators, checklists of key issues on priority areas. While women refugee, children refugee and environmental issues have been part of the inspection reports' work plans, they do not always figure in the report's core recommendations.

92. Inspections can nonetheless make a significant contribution to compliance, as for example, when an inspection team is directly involved in looking into children and women policy concerns. This can lead to a full range of recommendations which produce corrective follow-up action.

93. This demonstrates that the inspection function can be an effective compliance tool when inspection teams assume direct responsibility for field analysis, feedback and follow-up. Closer operational links between the Inspector's section and the Senior Co-ordinators units could help increase the usefulness of this tool. Finally, audits could also more examine systematically compliance with organisational policies.

Training

94. Training as a means of encouraging and stimulating policy compliance deserves particular attention. Without the relevant skills, understanding of the issues, and knowledge of how to function within the organisation's structure, staff cannot be expected to achieve the objectives fixed in policy statements.

95. Unfortunately, some staff-members perceive UNHCR's training efforts as not always focusing on the issues of their immediate concern, as well as sometimes lacking follow-up, or guidance on how best to use what they have learned. Clearly, if they are to be useful in generating compliance with priority policies, training packages need to be tailor-made, participants carefully selected, and follow-up systematic. For example, gender training such as POP needs to be updated. The current POP training package could be broken down into smaller more focused components that would address gender issues from different perspectives, such as protection, community services, procurement, headquarters or field perspectives.

96. An example of how training can influence compliance with priority policies may be found in a new initiative under the Action for the Rights of Children (ARC). The project aims at training and capacity-building undertaken by UNHCR and the International Save the Children Alliance for the benefit of field-oriented implementing partners. Model training programmes and policy workshops target different senior management, programme, protection and field staff levels of operations. UNHCR-NGO resource teams have been created in four regions to work on joint

assessments and project development to respond to unmet critical issues. The operational nature of ARC will hopefully make it an effective policy dissemination and compliance tool.

97. In view of the need to integrate environmental concerns into daily operations, the Environment Unit has also started a series of regional environmental management training workshops for UNHCR staff and implementing partners. The unit is promoting the incorporation of environmental components in existing UNHCR training modules, as well as disseminating awareness-raising publications and a special environmental training module.

98. Finally, in this regard, the envisioned OMS field training programme is potentially also an especially important mainstreaming device. Relevant Action for the Rights of Children, People Oriented Planning, and environmental materials could be usefully integrated into this programme, with staff from the Senior Co-ordinators' Units serving as resource people or trainers

Information campaigns

99. Mass information or mass communication campaigns can also be effective tools for promoting compliance with organisational policies. Such campaigns, even though they are generally aimed at external targets, such as the refugees themselves, as well as local communities and partners, may also serve as vehicles for the broad dissemination of policies, guidelines and instructions. They may usefully complement internal dissemination of policy guidance by preparing the beneficiaries to participate in activities planned on their behalf. Mass communication campaigns can help keep alive important concerns. In the areas of refugee women, refugee children and environmental affairs, they may indeed be an important tool to help create the necessary conditions for compliance with priority policies.