THE CODE OF CONDUCT REPORTING MECHANISM

ANNUAL REPORT 2016

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1. INTRODUCTION

This report is produced for internal use.

DRC's Code of Conduct Reporting Mechanism (CoCRM) is an indispensable element of DRC's commitment to accountability. It is also a sign of institutional maturity. DRC's commitment to accountability is further illustrated by DRCs engagement with the Core Humanitarian Standards on Quality and Accountability (CHS). The CHS certification could not have been achieved without an effective CoCRM.

However, the CoCRM is not just about satisfying the CHS; it is also about protecting DRC[1] and its donors from financial and reputational loss. Donors entrust large sums of money to DRC and trust is maintained if donors are confident that DRC has an effective method of managing financial and reputational misconduct. Reputation is a key element of maintaining DRC's mission and the CoCRM play an important role in protecting and maintaining DRC's reputation.

Last, but not least, the CoCRM exists primarily to protect beneficiaries.

Terminology and Scope

The report generally uses the term **Report of Suspected Misconduct – RSM** – to describe what can also be termed complaints or reports, however all three terms are used interchangeably.

The report covers **RSMs for 2016**. However, due to the very late time of reporting[2] an indication of expected total number of RSMs for 2017 is included. Also, the conclusions and reflections provided in this report are very likely to remain the same in the 2017 report which will be produced in first quarter of 2018. In effect, the 2016 report can easily be used as the base of an action plan for 2018.

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2. KEY ACHIEVEMENTS

The CoCRM has achieved the following in 2016:

Improved processes and systems

The transition from a parallel system[3] for tracking and recording data to one global online tracking tool was implemented in 2016 as the tool became available to all DRC operations from August 2015 and replaced all other tools.
From January 2016, it was established as a mandatory requirement for all operations to have a registrar to register reports of suspected misconduct (RSMs) and an authorising officer who have access to coc.drc.dk – together with trained investigators these are key functions related to the CoCRM. Some operations are yet to implement the CoCRM, as they are required to do.

Over the year a closer working relationship with HR (HQ) was forged to allow purely HR related RSMs[4] to be referred to HR via the CoCRM. This closer relationship with HR and Safety led to inclusion of the HR Business Partner and the Global Safety Advisor as permanent members of the HQ/Gate B Intake Committee, which now comprises of six permanent members. HR being

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[1] All references to DRC encompass the entire institution (DRC/DDG) and the many thousands of dedicated staff doing their very best to help people in extremis.

[2] Due to an even greater workload in 2017 than 2016 the report for 2016 has been down prioritized in return for being able to respond to the RSMs coming in.

[3] Data was initially to be recorded on excel when the CoCRM began in 2012. Then the online tracking tool was developed and piloted by Lebanon in 2014. 2015 was a transitional year that saw the end of recording data in excel.

[4] Often matters that are in fact purely HR get reported as RSMs.

an active member of the HQ Intake Committee helps bringing code of conduct issues to the attention of CoCRM when HR becomes aware of them.

Another focus area was maintaining and expanding the CoCRM's relationship with the Internal Auditor and his team. This has led to a formal role for the Internal Audit team to be the CoCRM's "eyes and ears" when on mission as well as a reciprocal role for the CoCRM to provide information to Internal Audit prior to country visits. This reciprocal arrangement has helped reveal suspected misconduct.

Training and awareness

The Gate B continued to support and mentor new investigators to help guide them through their first one or two investigations. Personal connections between staff at field/regional level and HQ – with invitations to Skype to offer advice/support with establishment of and administering the CoCRM – have been warmly received by field accountability focal points.

The continued training of investigators took place in the MENA (Amman) region and in Copenhagen. Participants attended from a wide variety of operations and HQ.

Training and roll out of the CoCRM in the West Africa region, Congo and CAR took place over the year. Training was conducted in French[5] (This took place in February 2016 at the WA regional office Abidjan) and supporting materials were translated into French.

The Code of Conduct training has in 2016 become an integral part of the standard induction training and the Stand by-roster training curricula facilitated in HQ, Denmark. In 2016 this training was delivered six times to HQ, field and secondment colleagues to approx. 130 persons.

In December 2016, the production of three Code of Conduct films was completed, with the following titles: 1) Introduction to DRC Code of Conduct; 2) Misconduct and Prevention and 3) Reporting misconduct in CoCRM. The films were produced in the three main DRC languages English, Arabic and French and shared with all countries and regions. In addition, master versions of the films were produced allowing translation into any local language with a view to wider dissemination and understanding of the Code of Conduct.

Capacity

HQ's capacity to administer the CoCRM and investigate RSMs saw a change of staff in 2016.

The increase of reports, as reported later in this report, has put maximum strain on the capacity of the Gate B resources. With the caseload increase of more than 60% and increased efforts in the area of training the existing setup has reached its limit for being able to absorb more tasks.

3. A NOTE ON THE DATA

The observations made in this report are based on data from the online database (tracking tool). All CoCRM data should have been recorded online from January 2016 by each operation's registrar. HQ's registrar and AO, as well as the Head of Risk & Compliance have access rights to review data input from all operations.

The review of the database for this report confirms that incomplete data input continues to be an issue.

Accordingly, drawing conclusions from the data can only be, in some cases, tentative and should be treated with caution.

The analysis of data in the report is for the most part done at the level of RSMs, and not on data from cases where misconduct was substantiated. This choice of focus is made to report on the CoCRM as first and foremost a channel which allows staff, beneficiaries and other stakeholders to raise concerns about the perceived conduct of the organisation in a confidential manner which ensures due process in the handling of such concerns. As such the report provides insight into how the organisations' conduct is perceived rather than actual misconduct that have taken place, as well as the ability of the CoCRM to be an accessible channel for stakeholders' grievances and complaints.

Benchmarks

As a new feature, the 2016 annual report introduces external benchmarks on two questions. The benchmarks are retrieved from the NAVEX[6] Global 2015 Ethics and Compliance Hotline Benchmark report. While it is not possible to directly compare the NAVEX hotline report with DRC's CoCRM the benchmarks are useful as indicators of the CoCRM's ability to capture a reasonable amount and types of RSM, and if the nature of reports is comparable to the surrounding world. The benchmarks selected for 2016 are:

1. Report volume per 100 employees. For this benchmark, it should be noted that NAVEX includes policy enquiries as well.
2. Report allegation categories. It should be noted that the categorization of reports in NAVEX is not directly comparable to the DRC CoCRM categorization, but the benchmark is used to reflect if RSM received fall under the strict CoCRM mandate or not.

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[6] NAVEX is an IT system that supports the tracking and reporting on activities in ethics hotlines. Please see http://www.navexglobal.com/en-us/resource-center/resource_type/benchmarking-reports for more information.

4. DATA ANALYSIS

GENERAL OBSERVATIONS - COMPLAINTS

The below table records the number of RSMs registered on the tracking tool. It is not a record of the responses to the RSM[7].

RSMs registered	2015	2016	% increase	2017 (Nov.)	% increase
Gate A	85	126	48	*144*	*14*
Gate B	26	57	119	*67*	*18*
TOTAL	**111**	**183**	**65**	***211***	***15***

The data from the CoCRM database shows (from 2015 to 2016) a **significant increase of RSMs reported to Gate A (48 %) and Gate B (119%)**.

NAVEX Benchmark
The NAVEX 2015 report volume per 100 employees is 1,3, ranging from 0.3 to 8,3. With a total of 183 reports received in the CoCRM the DRC report volume is 183 / 6300 * 100 = **2,9** (total number of complaints received / number of employees * 100)

This figure indicates that DRC is neither subject to serious underreporting nor serious over reporting. However, given the nature of DRC's operational context and the extreme risks connected to the work of the organisation it is fair to say that the number of reports is on the low side.

Gate A
The increase in Gate A reporting suggests increased awareness at both country and regional level. This awareness, it is suggested, arises out of support for countries and regions from the Code of Conduct office in HQ and engagement by senior staff at country and regional level in implementing CoCRM structures.

Gate B
The increase in Gate B reports is more difficult to explain. Factors that may contribute to this increase include:
1. Increased awareness that Gate B is an option
2. In operations where Gate A is not fully implemented, Gate B offers the only gate for a complaint.

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[7] It is often assumed that RSMs are always investigated. This is not the case. There is a range of options: referral to management (or HR), record for information, suspension (if it's not practical or too dangerous to investigate) and investigation.

3. If the complaint relates to management within an operation, then Gate B is the only credible option.
4. A perception that Gate B is seen as more independent and robust.
5. Cases of sexual harassment, sexual exploitation (SEA) and substantial fraud should always be escalated to Gate B (although this does not always happen).
6. Lack of capacity at Gate A
7. Lack of commitment at Gate A.

The key take away point is complaints at Gate A & B are increasing year on year.

2016: Total number of Reports of Suspected Misconduct (RSM)

Points of interest on RSMs related to <u>Gate A</u>

MENA:
- Lebanon registered 49 reports of suspected misconduct (RSM) in 2016 (43 in 2015)
- Iraq registered 9 RSMs in 2016 (0 in 2015)

HoA and Yemen:
- Uganda registered 10 RSMs in 2016 (4 in 2015).
- Kenya registered 10 RSMs in 2016 (2 in 2015).

Stand-alone countries:
- South Sudan registered 11 RSMs in 2016 (16 in 2015)

West Africa:
- Liberia registered 11 RSMs in 2016 (2 in 2015). This operation closed in June 2016**.**
- Niger, Nigeria & Mali**:** registered 4 RSMs in 2016 (0 in 2015). Training and roll out of the CoCRM in West Africa region in February 2016 could be an explanation for this increase**.**

CASWA:
- Afghanistan registered 4 RSMs in 2016 (2 in 2015).

Comments:
- With some exceptions, many operations have transitioned from registering no complaints in 2015 to registering RSMs in 2016. This is a significant step forward.
- High levels of RSMs from Lebanon may cause some distortion of the overall picture.

Points of interest on RSMs related to <u>Gate B</u>

MENA:
- Turkey registered 7 RSMs in 2016 (0 in 2015)
- Iraq registered 7 RSMs in 2016 (3 in 2015)

- Note Lebanon (despite very high levels of RSMs at Gate A) is not a frequent user of Gate B. It's unclear why: it may be that this operation does not attract Gate B cases (unlikely) or they do not escalate cases to Gate B (more likely).

HoA and Yemen:
- Uganda registered 10 RSMs in 2016 (4 in 2015).
- Kenya registered 10 RSMs in 2016 (2 in 2015).

Stand-alone countries:
- Sudan registered 6 RSM in 2016 (none in 2015).
- South Sudan registered 6 RSM's in 2016 (none in 2015).

West Africa:
- Liberia registered 11 RSMs in 2016 (2 in 2015). This operation closed in June 2016.
- Nigeria registered 6 RSM's in 2016 (none in 2015)
- Mali registered 3 RSMs in 2016 (0 in 2015). Training and roll out of the CoCRM in West Africa region in February 2016 offers the most credible explanation for this increase.

CASWA:
- Afghanistan registered 1 RSM in 2016 (none in 2015)
- Pakistan and Iran registered 0 RSMs in 2016.

Comments:
- With the exception of CASWA, there has been a *significant* increase in RSMs in all regions and stand-alone operations in 2016. This trend can confidently be expected to continue. This is a positive step toward accountability.
- The almost total lack of RSMs in the CASWA region is a cause for concern.
- The lack of Gate B cases coming from Lebanon is a concern.

2016 RSMs – GATE A: Who is reporting?

The following table shows data on the complainant type of the 126 RSMs that were registered at Gate A in 2016:

Gate A	
Complainant Type	**Count**
Staff - Current	52
Management	33
Beneficiaries	17
Staff - Former	11
Others	7
Contractor	3
None	1
Implementing Partner	1
Authority	1

Comments:

Growing numbers of Staff[8] and management used the CoCRM in 2016. This is a welcome development and suggests staff awareness is becoming stronger - but there are gaps in awareness among frontline staff (see below).

Very low numbers of beneficiaries used the CoCRM in 2016. This must be an area of concern. Globally DRC assists millions of beneficiaries and mere 17 beneficiary complaints were registered in 2016. This number cannot reflect the reality on the ground and suggests awareness is very low and/or that beneficiary complaints are addressed (most probably by frontline staff) in a different manner than through the formal complaint systems that the CoCRM represents.

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[8] DRC presently employs 5787 national staff and 508 expatriate staff in approx. 40 countries.

2016 RSMs – GATE B – Who is reporting?

The following table shows data on the complainant type of the 57 RSMs that were registered at <u>Gate B</u> in 2016:

Who is reporting suspected misconduct at Gate B?
- Predominantly management and staff. Mainly from MENA, WA and HOA.
- Beneficiaries account for a tiny proportion at gate B.

Gate B	
Complainant Type	**Count**
Management	26
Staff - Former	13
Staff - Current	6
Contractor	5
Others	4
Beneficiaries	2
None	1

Comments:

The large percentage of RSMs from managers at Gate B is not surprising and this might be explained by more awareness at managerial level of management's additional responsibility to promote and respect the CoCRM. Managers are also more likely to be in a position to spot suspected misconduct in their peers and have the confidence to report. In these circumstances, the only Gate available to report will be Gate B.

The low level of reporting from beneficiaries is unsurprising. Beneficiaries' main point of contact with DRC will almost always be frontline staff and this is where the message needs to be delivered that a right to complain exists, but very low levels of reports from beneficiaries suggests this message is not getting through. It is also noteworthy that frontline staff represents the most likely perpetrators (44% of subjects at Gate A – see below) of suspected misconduct. This is a poor combination that invites a lack of accountability and misconduct.

2016 RSMs – GATE A and B – who are the subjects?

The following table shows data on RSMs that were registered at Gate A in 2016.

Gate A	
Subject Type	**Count**
Frontline Staff - Current	56
Support Staff - Current	31
Management - Current	17
Others	6
Unidentified	6
Support Staff - Former	5
Implementing Partner	3
Management - Former	2

Typical subjects at Gate A

- **Frontline staff**: 44% of subjects in 2016.
- Support staff: 29% of subjects in 2016.
- Management: 15% of subjects in 2016.

Comments:
The stand out statistic is that **frontline staff** represents the biggest risk in relation to RSMs at Gate A. This fact, combined with low levels of RSMs from beneficiaries (whose contact with DRC will be through frontline staff), is a cause for concern.

The following table shows data on RSMs that were registered at Gate B in 2016

Gate B	
Subject Type	**Count**
Management - Current	36
Support Staff - Current	6
Unidentified	6
Frontline Staff - Current	5
Support Staff - Former	2
Frontline Staff - Former	1
Others	1

Typical subjects at Gate B

- **Management:** 63% of subjects in 2016
- Support staff: 14% of subjects in 2016.
- Frontline staff: 11% of subjects in 2016.

Comments:
The stand out statistic is that **management** represents the biggest risk in relation to RSMs at Gate B. The reason for high levels of RSMs registered at Gate B against management is best explained by the fact that a complainant cannot effectively make a complaint against management at Gate A, as the management complained about would very likely be very close to the body deciding on the outcome of the complaint. However, it could also be an indication of a general trend of complaints mechanisms, according to NAVEX, being used by staff to raise general grievances about management and other HR issues (see later).

2016 RSMs – GATE A and B – Types of misconduct

GATE A

The following table shows data on types of misconduct registered at Gate A in 2016:

Gate A		
Misconduct Type	**Count**	**%**
Corruption	39	35%
Blank	27	24%
Other	23	20%
SEA	12	11%
Violence	6	5%
Unprofessionalism	5	4%
Retaliation	1	1%

Gate A: Typical misconduct at Gate A

Corruption: 39 RSMs in 2016 (23 in 2015)
Sexual exploitation and abuse (SEA): 12 RSMs in 2016 (7 in 2015)
Violence: 6 RSMs in 2016

Comments:
An almost doubling of SEA reports (although still small numbers). This suggests greater awareness of the issue. It also it also highlights an issue that such cases are not being escalated to Gate B [9]– which they should be. The reason being that HQ needs to be aware of these issues to be in the best position, not only to address such serious misconduct, but also to mitigate reputational damage if the case gets media exposure.

There are high numbers of reports that are left blank (27) or registered as other (23). This is probably due to registrars struggling to keep up with other work commitments. Administering the CoCRM is always an additional, and not primary, task for staff and it is time consuming. Having such a high number of blanks may be masking data on serious areas of concern such as SEA.

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[9] If SEA gets reported to Gate A, this should always be brought to the attention of Gate B. In the tracking tool, the RSM's status is changed from A to B. This does not result in double reporting.

GATE B

The following table shows data on types of misconduct registered at Gate B in 2016:

Gate B		
Misconduct Type	**Count**	**%**
Corruption	17	33%
Other	16	31%
Blank	7	14%
SEA	5	10%
Workplace Harassment	5	10%
Violence	1	2%

Gate B: Typical misconduct at Gate B

Corruption: 17 RSMs in 2016 (7 in 2015)
Sexual exploitation and abuse (SEA): 5 RSMs in 2016 (1 in 2015)
Workplace harassment: 5 RSMs in 2016 (5 in 2015).

Comments:
As in Gate A, there is the same (but steeper) upward trend in Gate B so far as corruption and SEA is concerned.

NAVEX benchmark: Allegation categories

The second NAVEX benchmark chosen for the 2016 Annual report is the report allegation categories. Of the NAVEX allegations 69% related to HR, Diversity and Workplace respect. For DRC's CoCRM 10% are immediately related to workplace harassment. However, it is the experience from the ITC members at Gate B that the majority of cases registered as "Other" might well concern what would be reflecting the benchmark. This notion is unfortunately not supported by easily retrievable data from the system, but anecdotal evidence shows that it might very well be correct anyway.

In addition, the quite high number of reports concerning management could be an indicator that staff uses the CoCRM to raise concerns and grievances about management, maybe in the absence of other mechanisms to resolve such issues. However, the benchmark from NAVEX more than anything else shows that this is a "normal" trend rather than an odd one. But in any case, it raises the need for reflecting if the CoCRM should accept this function and simply deal with it as a standard referral practice, or if more effort should go into raising awareness of the purpose of the mechanism and the eligibility of complaints.

2016 RSMs – Intake Committee Response and results

All RMSs are processes by the Intake Committee either at Gate A or Gate B. The IC can decide on a number of responses to the RMS: Investigation, recorded for information, referral or suspension. Out of the total of 183 RSMs received in 2016 Intake Committees decided on investigation as the adequate response in 73 cases.

The table below shows the investigation outcomes. An investigation report means that the RSM was substantiated[10]; a closure report means that the RSM was not substantiated. Other/blank indicates a variety of outcomes, e.g. that the case was suspended, that no report was finalised (for many reasons), that the case is still open or that the data has simply not been updated.

	Total	Gate A	Gate B
Investigations conducted	73	54	19
Investigation outcomes			
Investigation reports	29	24	5
Closure reports	21	9	12
Other/blank	23	21	2

The data shows that while reports are received more than half of them are either not eligible for processing under the CoCRM mandate (i.e. report does not relate to suspicion of serious misconduct) or they are for a reason not deemed suitable for an investigation. Keeping in mind the NAVEX benchmark above this is not necessarily out of the ordinary and seems to reflect that the CoCRM is used for raising other types of concern than what is considered serious misconduct by the ITC's.

Close to 40% of the cases investigated resulted in an investigation report which means that the RSM was substantiated.

2016 RSMs – GATE A and B – Types of loss

The online tracking tool requires RSMs to be categorised by one of three loss types: reputational, financial or reputational and financial. Users can only select one option. Arguably all suspected misconduct carries an element of reputational and financial loss. Accordingly, which category is chosen is open to interpretation.

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[10] The CoCRM standard of proof is "balance of probability", which means more than 50% likelihood of either or not misconduct took place.

The following table shows data on type of loss at Gate A and B in 2016

Gate A		Gate B	
Loss type	**Count**	**Loss type**	**Count**
Reputational	65	Reputational	40
Reputational & Financial	29	Reputational & Financial	12
Financial	17	Financial	4
Blank	15	Blank	1

Comments:

Reputational loss

At both Gate A & B there is the same pattern that reputational loss dominates statistically, followed by reputation and financial loss and then financial loss. This suggests reputational loss is regarded as the most appropriate loss to users.

Financial loss

Extracting accurate data from the tracking tool on financial loss is an issue. Consequently, it is not possible to provide any reliable figure on actual total losses as a result of misconduct in 2016.

There are several main problems around the recording of financial losses due to serious misconduct:

1. The tracking tool allows users to input a *suspected* financial loss and then this figure should be updated when/if the loss is proven as an *actual* financial loss. Users do not always input or update this data.

2. The users who are allowed to input data in the system are rarely the same as those who are sorting out the accounts and figures when an investigation has proven that misconduct has taken place. An investigation report is not always able to account for the monetary value of the actual loss in details but more on the evidence of the methods used and who did it. A follow up controlling process to an investigation report will often be able to come up with a more precise amount.

3. It is often a matter of estimation and interpretation to account for the monetary size of a loss. In simple cases of theft or fraud it is easy, but in cases of e.g. collusion or overpricing the actual amount lost can be very difficult to interpret. This estimation is not carried out by the investigator or the registrar but rather by the management following up. It is not always that registrar received the information about the actual loss generated by a case, or actively seeks it out to update the system.

4. Losses are recorded in the financial system, but the manner in which losses are recorded does not allow the production of segregated reporting on causes of loss and loss types.
5. Operations are obliged to report on financial losses due to fraud, corruption, theft etc. directly to DRC HQ. However, no clear procedure for filing and cross referencing these reports exists.

Capacity Challenges at Gate B

The CoCRM follows a recognized quality standard for its work, which aims at ensuring due process, confidentiality and objectivity throughout the investigation process. An investigation guideline was established in 2013 with sets standards and methods for the investigative process which the Gate B follows diligently.

In average, an investigation process takes 3 weeks full time work for the investigator, however often spread over the double time as there are often periods of waiting for responses, documents etc. In addition, the work and support of the authorizing officer and other intake committee members adds another total of 1 week full time equivalent work. The tables below provide an overview of tasks and time spent in an average investigation process and an estimate of total work time spent by the CoCRM team on investigations.

Tasks, average per case	Work days	Resources 2016	Work days
ToR & Investigation plan	0,5	Investigations conducted in 2016	19
Organisation of interviews	1		
Documents retrieval & review	2	Annual workdays per person	220
Interviewing and processing	3	CoC Investigation time spent[11]	203
Analysis and reporting	3		
Management follow up, support and queries	2	Resources in team, 1.5 FTE	330
Travel	2	Remaining for prevention etc.	**127,5**
Total work days	**13,5**	**in % remaining work time**	**39%**

With the 2016 (and 2017) resource setup of 1,5 FTE in the CoCRM and the increased intake of RSMs, the time for prevention, training, awareness raising, coaching and policy improvements was 39% of the total time available in 2016.

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[11] The CoC Team investigated 15 out of the 19 cases. The remaining 4 were investigated by other HQ resources.

5. CONCLUSIONS

- Data input on the online tracking tool continues to be inadequate and extracting data is problematic.
- The trend of increased reports at Gate A and B continues: Gate A (48 %) and Gate B (119%). The steep rise at Gate B is particularly noteworthy. All the signs are that this trend will continue.
- At Gate A, with implementation support from HQ, many operations that registered no (or very low) complaints in 2015 reported more frequently in 2016.
- At Gate A, very low levels of reports from beneficiaries continue to be a concern.
- At Gate A **Frontline staff** represented 44% of subjects in 2016, suggesting a more training on the code is required in this area to mitigate this risk.
- At Gate B **Management** represented 63% of subjects in 2016, suggesting more training on improving management skills is required to mitigate this risk.
- At Gate A, reports of corruption and SEA almost doubled (although still small in number). With many more operations moving from no reports in 2015 to reporting in 2016 – this suggests that a more realistic picture of the scale of misconduct is emerging. Gate B also saw an even steeper increase in the areas of **corruption** and **SEA.**
- Loss of **reputation** features as the most serious potential risk.
- It is hard to come to any sensible conclusion in relation to suspected financial loss in 2016.

6. RECOMMENDATIONS

1. Operations should prioritise appointing accountability officers dedicated to the administration (including the ability to investigate and deliver training) of the Code of Conduct and CHS. This must be their primary function – not an additional task. This would add capacity at country level, help in the quest to train frontline staff and inform beneficiaries. It would also be expected to lead to improved data input. Such a position would have a preventative impact (training staff and informing beneficiaries of their right to complain) and reactive impact (administering the CoCRM and investigating).
2. For Gate B to adequately respond to the steep and continuing rise in complaints requires additional staff. Investigating suspected serious misconduct is a very time-consuming undertaking.
3. To mitigate the high proportion of complaints against management at Gate B, it is recommended that management receive training on effective management skills and the Code of Conduct.
4. Low levels of SEA reports are still an issue – but the trend is upward. The most vulnerable targets for this type of misconduct are beneficiaries. Information on their

right to complain needs to be significantly enhanced. In addition, training on this issue needs to be delivered to frontline staff (who account for 44% of subjects at Gate A).

5. The CoCRM tracking tool needs to be enhanced/updated or replaced with a more modern system. Extracting accurate data is problematic as the discrepancies in the number of SEA cases and financial losses illustrate. It is hard to be certain if this is due to poor data input, the system or a combination of both.

6. The exchange of data between the CoCRM and the financial system is non-existing, and not supported by a workflow, which allows the capturing of such data. Neither is the financial system set up to record financial losses on cause and categories allowing segregated reporting.

7. A review of how the CoCRM operates in Lebanon.

7. PROCESS FOR ACTION PLAN

The Gate B Intake Committee will conduct a one day seminar on lessons learned from the 2016 and 2017 RSM on the 8th of December 2017. The outcome of the seminar will be a suggested action plan for 2018 which will be presented to the SMG and the SG for approval. The action plan will take into consideration the findings of this report as well as the results of the CHS certification process undertaken in 2017.