

**United Nations Development Programme – OAI, Social and Environmental
Compliance Unit**

Final Monitoring Report:

Relating to SECU's investigation into allegations of non-compliance with UNDP social and environmental commitments in the context of the following UNDP project:

“Malawi National Registration and Identification System Project”

Case No. SECU0005

Date: 24 June 2024

Basic Data

Case No.	SECU0005
Category of Non-Compliance:	Social and Environmental
Location:	Malawi
Date Complaint received:	1 October 2017
Source of Complaint:	Confidential
Date of Administrator's decision:	2 March 2020

I. BACKGROUND

1. In 2019 the Social and Environmental Compliance Unit (SECU) released its final investigation report in response to a complaint received concerning the UNDP Malawi National Registration and Identification System (NRIS) Project.
2. SECU has been monitoring the Administrator's decision in relation to that case, which was issued in March 2020. SECU published a detailed Interim Monitoring Report in November 2022, setting out its monitoring activities and the various updates received from the Country Office.¹
3. This Final Monitoring Report builds on SECU's Interim Monitoring Report, detailing monitoring activities from November 2022 to date.

II. MONITORING ACTIVITIES

4. The Administrator's decision stated that:

"Looking ahead, UNDP will put in place a series of follow up actions to respond to each of the five recommendations of the report. These include actions to:

 - Ensure adequate screening for social and environmental risks in future UNDP projects.
 - Ensure that all procurement processes include SES requirements as per UNDP's Programme and Operations Policies and Procedures (POPP) and that contractors are made aware of and supervised to implement relevant measures to comply with the SES.
 - Continue to bring all credible allegations of sexual harassment and sexual exploitation and abuse to the attention of UNDP's Office of Audit and Investigation (OAI), for its assessment.
 - Ensure measures required by SES around labour standards are applied to future UNDP projects as appropriate, including in the activities of sub-contractors.
 - Ensure that future projects enhance grievance redress systems and ensure they are easily accessible to those potentially impacted."
5. Following the Administrator's decision, the key action items outlined in the Country Office's Management Response focused on the next phase of the NRIS project, namely the child registration project. This next phase was launched in 2020, although the implementation was postponed due to the Covid-19 pandemic.

¹ Available on SECU's Case Registry:

https://secu.info.undp.org/sites/g/files/zskgke461/files/sites/registry/secu/SECU_Documents/SECU0005_Interim%20Monitoring%20Reportc79d4b29a8d146febfa5214f95f6f7fc.pdf

6. As described in SECU's November 2022 Interim Monitoring Report, the CO had indicated to SECU that the new methodology for child registrations relied entirely on schools as Registration Centers, with teachers, already employed by Government, receiving an additional allowance for their registration efforts. The roll out of the child registrations was planned in two stages, the first being a pilot in three districts, and the second being the full roll out based on lessons learnt from the pilot. The pilot was completed in 2022.
7. In 2023, SECU followed up with the CO for information on the execution of the pilot, including lessons learnt, and an update on the full roll out. The CO shared various lessons learnt from the pilot, including: a recommendation that the allowance for teachers should be increased; the need for quality control on the selection of teachers capable of doing registrations; and the need for a robust civic education approach to ensure that a high number of children will be registered. The CO indicated that the full roll out had been postponed, due to funding shortages.
8. SECU responded with questions and requests for documentation supporting the insights shared (the lessons learnt) to better understand how conclusions had been drawn in relation to the pilot, and the plans for integrating those lessons into the full roll out.
9. In response, the CO indicated that "after the introduction of new methodology the responsibility of implementation rests with the Government of Malawi and not UNDP. The role of UNDP Malawi is limited to provide technical support to National Registration Bureau and in the future phases this technical support will be limited to IT technical support related to software upgrades. The Government of Malawi relevant Institutions have been capacitated to undertake the initiative on its own using funding from Government budget. In terms of improvements in the methodology, a Lessons Learned Workshop was organized and all aspects of the pilot were discussed and the participants provided a set of recommendations to the Government authorities, which were adopted by the Government. This includes the increase in allowances for the teachers. The new Operational Plan reflects this decisions of the Government of Malawi."
10. SECU engaged further with the CO to better understand the role of the UNDP in the child registrations and SECU also independently reached out to the National Registration Bureau to confirm their understanding of the role of UNDP. In these discussions, the CO stated that the "National Registration and Identification (NRIS) is a 'DIM' project and is coming to an end in June 2024. For the pilot implementation of birth registration in three districts, UNDP, UNICEF, and the National Registration Bureau (NRB) of the Government of Malawi each assumed responsibility for different components, working together to implement the pilot initiative. The UNDP support from the NRIS project was limited to technical assistance including development of the software, training materials, support conduct of training, data analysis and printing of birth certificates. UNICEF provided support for civic education activities to ensure that all stakeholders know the pilot initiative and benefits of Birth Registration. The NRB through the funds made available by Government of Malawi lead the implementation of the pilot with UNDP

through NRIS project and UNICEF providing support to the above indicated activities. Please note that the implementation methodology has substantially changed from the National ID roll that resulted in challenges related to staff recruited by a third party. The NRIS project is no longer recruiting any personnel for which UNDP is responsible. Even for the Government of Malawi there is no recruitment of staff being undertaken and existing school teachers already employed by the Government of Malawi are being used. The Government funds for operational support and implementation were provided from the Government budget, disbursed from Government Accounts using Government procedures and were not deposited into the project account. As such the funds are not under the remit or accountability of UNDP. The Government uses national laws, legal framework, and civil service charters to regulate the work of its teachers. The process is nationally owned and nationally led using Government systems.” SECU met virtually with the Principal Secretary of the National Registration Bureau (NRB), who confirmed that UNDP’s role was limited to the purchasing of tablets for the registration process, the printing of birth certificates, and technical support in relation to the training. For the training, the Principal Secretary of the NRB described UNDP’s role as helping in the design of the training materials.

11. In relation to questions about precautionary measures and training focused on the prevention of sexual exploitation, abuse and harassment, the CO responded that “Aside from the Ministry of Gender and Social Welfare, UNICEF took the lead on this aspect, given its involvement in birth registration implementation and mandate. UNICEF played a key role in developing SEAH materials and conducting training sessions. The training materials developed by UNICEF is attached, UNICEF experts delivered the trainings.”
12. In relation to questions about the development and availability of a grievance redress mechanism for the project, the CO responded that “UNDP provided technical support in the development of the SoP to be used by the Government of Malawi on Grievance redressal mechanism for the implementation of the Mass Child Registration Exercise (copy of the SoP is attached). NRB established a call center for handling all the grievances. For the Government staff who were involved and will be involved in the next phase of the birth registration, the existing government grievance redressal mechanism (please see Manual of Misconduct and Disciplinary Procedures) will be used in addition to the SOPs developed by NRB for grievance redressal with technical support of the project.”

III. NEXT STEPS

13. UNDP’s support under the NRIS project came to an end in June 2024.
14. Given the significantly reduced role played by the UNDP in the child registrations and the conclusion of the project, SECU has decided to close this case. The reasons for closure are set

out more fully in the Closure Note, including an assessment of whether the Administrator's decision has been implemented.