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DRAFT- SEEKING YOUR COMMENTS AND SUGGESTIONS

Implementing Partnership Management Guidance Note No.

XXX

Investigation and Ethical Considerations - Bipartite Project NGO Partner Agreement

(draft 2 June 2015)

Subject:	Investigation and Ethical Considerations
Reference Documents	<ul style="list-style-type: none">- UNHCR Investigation Guidelines- Enhanced UNHCR Framework for Implementing with Partners- Standard Format Bipartite Project Partnership Agreement (PPA) (UNHCR with non-governmental and other not-for-profit partners)
Reference No.	Policy: UNHCR/HCP/ Guidance Note:
Date of Issue	
Date of Revision	

This Guidance Note informs Partners of recommended procedures to follow in cases of alleged misconduct, in areas of:

- Reporting of misconduct and referral of cases
- Sharing of sensitive materials and case information
- Preparation for and conduct of joint investigations
- Availability of an Investigation Specialist Roster

This policy requires:

- UNHCR offices to share with the relevant Partners this section of the policy on Investigation and Ethical Considerations
- UNHCR offices and Partners must fully understand the policy and its correct application before entering into a Project Partnership Agreement, and must

comply with its requirements.

A. Introduction/Purpose

1. This Guidance Note informs Partners about UNHCR requirements and procedures related to alleged misconduct. Reference is made to the Project Partnership Agreement (non-governmental and other not-for-profit partners), and the standard clauses on “Investigation and Ethical Considerations”, and its **Appendix** on Standards of Managing Misconduct, which lists minimum standards and procedures that the partner is expected to have in place (or have a plan and timeframe to realize the minimum standards). The **Appendix** states: “A separate Guidance Note for NGO partners (forthcoming) shall provide additional information on standard operating procedures, sharing sensitive material case information, confidentiality, managing case files and evidence.” This Guidance Note, therefore, explains and elaborates upon these important components of investigation procedures.

B. Rationale - obligations of UNHCR and the Partner

2. The paragraphs below identify obligations on the part of UNHCR and its NGO partners on ethical and professional conduct and behaviour. They include information on investigative actions to take related to the planning and conduct of investigations.

3. Standard clauses on investigation in the PPA state that both parties shall commit to carry out all their activities with the highest ethical and professional standards, both within their respective organizations and externally, in conformity with their humanitarian nature. The parties shall undertake to inform their personnel to refrain from any conduct that could potentially be perceived as having an element of conflict of interest or adversely reflect on UNHCR and/or the United Nations and from any activity that is incompatible with the aim and objectives of the United Nations or the mandate of UNHCR. The parties shall undertake all reasonable measures to prevent their personnel from exploiting and abusing refugees and other persons of concern and from engaging in any form of behavior that could amount to misconduct.

4. The Partner shall ensure close cooperation with UNHCR regarding the planning and conduct of any investigation or administrative action in regard to allegations of such abuse and possible misconduct, and shall share with UNHCR the full investigation report, or a redacted summary thereof to safeguard confidentiality. When deemed necessary and appropriate by both parties, UNHCR may conduct an investigation in coordination with the Partner and share the findings with the Partner. Alternatively, the Partner may request UNHCR to conduct an investigation.

5. Following from the above, Partners are expected to conduct their own investigations, where they have the organizational capacity to do so. Close cooperation between the UNHCR Inspector General’s office (IGO) and UNHCR’s NGO partners may involve the referral of cases of possible misconduct. Some case referrals may involve the need for sharing of sensitive materials and case information, for possible joint or collaborative investigative action. Such sharing of information will strengthen the trust and partnership that exist between UNHCR and its NGO partner agencies, as well as improve mutual investigative capacity. Other case referrals may lead to a joint IGO-NGO partner investigation, and generic Terms of Reference have been developed in this regard. Another option could be utilization of the NGO Investigation Specialist Roster for the provision of investigatory expertise to the NGO Partner.

6. This Guidance Note, therefore, provides additional guidance for NGO Partners in establishing their own investigation guidelines and procedures, in four specific areas:

- **Reporting of misconduct**
- **Sharing of sensitive materials and case information**
- **Preparation for and conduct of joint investigations**
- **The NGO Investigation Specialist Roster**

NOTE: More detailed information on case referral, sharing of materials, and joint investigations, and ANNEXES referred to below, are included in the UNHCR Partner Portal. These and other investigation-related materials are also available on the UNHCR external website, under IGO (Inspector General's Office), UNHCR Investigation Resource Manual.¹

C. Reporting of misconduct and referral of cases

7. The UNHCR Inspector General's Office (IGO) is responsible for ensuring that possible misconduct involving any entity or person having a direct contractual link with UNHCR (including consultants and UNVs) is properly investigated. Given the potentially large scope of third party investigative responsibilities, **priority is given by the IGO to serious allegations concerning sexual exploitation and abuse, serious fraud² and criminal behaviour.** At the same time, the IGO will ensure that all allegations of misconduct are properly dealt with, through close cooperation with NGO partners. One aspect of this cooperation is the referral of possible misconduct cases for investigative action. The referral of cases can occur in one of several ways, as summarized below. When cases are referred, the annexed "Model Referral Form" (**ANNEX 1**) should be used by the organization making the referral.

8. **When UNHCR staff in a country office learn about possible misconduct connected to activities of the Project Agreement on the part of the NGO partner (staff or deployee):** The allegation must be immediately and confidentially referred by the UNHCR field office to the IGO Investigation Service, which will transmit the allegation to the Headquarters of the NGO partner³(General Secretary/Head of the NGO or designated focal point for investigations, if known to UNHCR). The IGO, in cooperation with the NGO partner, and, through it and as required, in consultation with other institutional donors of the NGO, will determine the most appropriate course of action to take. Where the NGO partner does not have the capacity, it has the option: to request the IGO to conduct or provide guidance on the investigation; to suggest a joint investigation with the IGO; or to arrange for an external investigator, through the NGO Investigation Specialist Roster. When the NGO does have the capacity, it should conduct the investigation itself and report results to the UNHCR IGO.

¹ Links should be created to the Partner Portal and the Investigation Resource Manual.

² Fraud is defined as: any act or omission, including misrepresentation or concealment of a material fact, that knowingly or intentionally misleads, or attempts to mislead, a party to obtain a benefit, whether directly or indirectly, whether for oneself or for a third party. Fraud could involve misappropriation of cash or other assets, or fraudulent statements. From the UNHCR Strategic Framework for the Prevention of Fraud and Corruption, 2013.

³ To refer to the global headquarters of an international NGO, or to the central or main headquarters of a national NGO.

9. **When staff of the NGO partner learn about possible misconduct connected to activities of the Project Agreement on the part of one of its own staff (or deployee):** This allegation must be immediately and confidentially referred to the Headquarters of the NGO partner (General Secretary, Head, or designated focal point, according to the rules and procedures of the NGO), which, following initial assessment and confirmation of allegations, will transmit the allegation to the IGO Investigation Service. Thereafter, the same procedure as in paragraph 6. above will apply.

10. **When UNHCR staff, or staff of the NGO partner, learn about possible misconduct on the part of the NGO partner, but not directly related to activities of the Project Agreement:** Possible misconduct may be related to the well-being of refugees and persons of concern to UNHCR, or may have broader implications for the work of UNHCR and/or the partner. Serious allegations (sexual exploitation and abuse, fraud and criminal behavior), must immediately and confidentially be made known to the IGO Investigation Service. The NGO partner will deal with the case according to its rules and procedures (either immediate referral to its Headquarters, or prior initial analysis). UNHCR and the NGO will consult together on the most appropriate course of action to take. All other cases would be handled by the NGO.

11. **If a UNHCR staff member (or consultant or UNV) is implicated along with the NGO partner in any of the above scenarios:** The case must be confidentially referred to the UNHCR Investigation Service and to the Headquarters of the NGO partner for further action, which together will decide on the best course of action to take. UNHCR must carry out the investigation if a UNHCR staff member is implicated. If UNHCR and the NGO partner together are implicated, then a joint investigation may be considered.

12. **If the NGO learns that a UNHCR staff member (or consultant or UNV) is suspected of possible misconduct:** The case must be confidentially referred to the IGO Investigation Service. The IGO will then take applicable investigative action in accordance with UNHCR rules and procedures. As in paragraph 9. above, the IGO must carry out the investigation if only a UNHCR staff member is implicated, and the allegation does not implicate the NGO partner. [In accordance with the rules and practice governing personal data of UN staff, the NGO will be informed of the completion of the investigation without any further details being provided.](#)

13. In all of the above examples involving UNHCR, the IGO will acknowledge in writing the complaint within five working days of its receipt, and recommends the same when the complaint is directed to an NGO's Headquarters. The Standard Operating Procedure (SOP) on the Referral of Cases provides additional detailed information.⁴

⁴ Footnote for editor: A link should be created to the SOP.

D. Sharing of Sensitive Materials and Case Information related to Misconduct

14. The following paragraphs summarize the UNHCR guidelines on confidentiality, case files, and evidence⁵, which are all relevant to the sharing of sensitive materials and case information.

15. **Confidentiality:** Confidentiality must accompany the sharing of any sensitive materials and case information. Activities by the IGO and by NGO partners with respect to reports of possible misconduct are to be conducted in a confidential manner. Strong efforts should be put into place to ensure confidentiality during all phases of an investigation, including case information relating to complainants, witnesses and subjects of a complaint. Information about an investigation should only be shared with or communicated to people who have a legitimate need to know (determined on a case-by-case basis). For this reason, and with respect to the rights of all concerned, complainants, witnesses or others are not entitled to demand information about an investigation, its status or its conclusions.

16. **Confidentiality Agreement:** Staff members and other personnel who have access to confidential information in the course of an investigation are required to respect confidentiality and not disclose information unless authorized in writing by both the IGO and the partner. Confidentiality is furthermore protected by an oath signed by all UNHCR staff members, consultants or any other persons whose work or cooperation with the IGO requires access to confidential information (see **ANNEX 2, UNHCR Confidentiality Agreement**). Confidentiality is also protected by provisions in investigation policies and guidelines of the UNHCR partner. In no case will either party reveal, transmit in writing or discuss names or identities of any staff, without prior written approval of the party concerned.

17. **Case files:** File management is an important feature of the investigation process. It assists in ensuring the integrity of the investigation and shows that a clear methodology has been followed. UNHCR will create case files according to the procedures summarized below, and when agreed with the NGO partner will share this information with the partner. Case file information relevant to the investigation shall be shared between UNHCR and partner investigators in joint investigations.

18. An electronic folder will be created by UNHCR for each investigation case, and will be shared in joint investigations. This folder contains the material relevant to the matter under investigation. It will include, but is not limited to a **Record of Interview (template found in the Investigation Resource Manual)**, Notes to File, email correspondence and other documentation. The electronic file will be accompanied by a physical file where original documents are stored. This will include any original documents, such as signed Records of Interview, Exhibit Receipts and documentary evidence. Scanned copies of these original documents should be included in the electronic file.

19. [The Partner warrants and undertakes on a continuing basis that when collecting Personal Data, it will inform individuals of the specific purpose for processing the data, the fact that the Partner acts in partnership with and on behalf of UNHCR, and that UNHCR will have access to such personal data or that such data will be transferred to UNHCR.](#)

20. **Evidence:** Case information may include evidence, in addition to case files. Evidence is any type of proof which tends to establish a fact material to the case. The different types of evidence can be categorized as follows:

⁵ From the UNHCR Guidelines on Conducting Investigations and Preparing Investigation Reports, December 2012.

- (i) **Testimonial evidence:** Testimonial evidence typically includes the recollection of individuals who actually saw an event or have direct knowledge of something relevant to the issue being investigated.
- (ii) **Documentary evidence:** This includes correspondence, forms and all information that may be maintained on paper in official archives, as well as external material such as personal letters, business records, etc. Documents and records may exist in physical and/or electronic form.
- (iii) **Electronic evidence:** Electronic evidence includes correspondence, forms and all information that may be maintained on paper in official archives, as well as external material such as personal letters, business records, etc. Documents and records may exist in physical and/or electronic form.
- (iv) **Physical evidence:** Physical evidence includes equipment, goods and facilities, and any other tangible objects.
- (v) **Forensic evidence:** Forensic evidence is a general category that could include fingerprints, Deoxyribonucleic acid (DNA) trace material and even scientific analysis of items to establish certain properties or source. It has, therefore, an element of analysis or interpretation that requires special handling and explanation that physical and even electronic evidence may not.

21. **UNHCR handling documentary and physical evidence:** When handling the original version of documentary or physical evidence, a clear chain of custody record must be maintained. From the moment the UNHCR investigator takes control of the evidence, a record of its receipt and subsequent handling must be kept, including the dates and the times when it was obtained.

22. **UNHCR receipt of evidence:** When certain evidence is obtained (e.g. items that are normally used or held by the source), the source is provided with acknowledgement or a receipt listing the evidence that has been given (**template found in the Investigation Resource Manual**).

23. **The Standard Operating Procedure, Sharing of Sensitive Materials and Case Information,**⁶ provides additional guidance for NGO partners on confidentiality, case files, and evidence.

E. Terms of Reference (ToR) – Joint UNHCR – (Name of Partner) Investigation Team⁷

24. In some instances, a joint UNHCR-NGO partner investigation will be planned and carried out. These Terms of Reference (ToR) define the elements and parameters thereof.

NOTE: These ToR are applicable only to joint UNHCR – NGO partner investigations, and do not concern joint investigations carried out by UNHCR and a governmental partner.

25. **Purpose of Terms of Reference:** These ToR supplement the UNHCR Guidelines on Conducting Investigations and Preparing Investigation Reports (2012) and the (name of NGO) Investigation Guidelines. The purpose of these TOR is to clarify the composition, responsibilities, duties, and limitations of any joint investigative team appointed by UNHCR and the (name of NGO), for the purpose of conducting a joint investigation. This document does not provide the criteria for joint investigations, nor describe investigative procedures, techniques, or requirements. Nor does it recommend specific disciplinary actions, organizational structures, or services to be provided to victims of sexual abuse and exploitation.

⁶ Footnote for editor: A link should be created to the SOP.

⁷ As adapted from : the UNHCR Investigation Guidelines; the HAP Investigation Training Handbook, and the CCSDPT Thailand ToR Investigation Team for Allegations of Sexual Abuse and Exploitation by Humanitarian Workers

26. **Mandate of Joint Investigation Team:** The mandate of the Joint Investigation Team is to plan and conduct a joint investigation into any form of misconduct, by staff members of the NGO and UNHCR who are implicated together, if a joint investigation has been decided upon. A joint investigation may also be carried out when the NGO partner does not have sufficient resources or expertise to conduct its own investigations, and requires the assistance of UNHCR. Following the investigation, the joint investigation team will prepare either an investigation report when the established facts substantiate misconduct, or a closure report when the investigation has determined the allegation to be unfounded or cannot be substantiated.

27. **Joint Investigations:** All allegations of serious misconduct on the part of the UNHCR partner, connected to activities of the Agreement and activities that fall under the UNHCR mandate, must, following initial assessment and confirmation of allegations, be initially referred to the Investigation Service, Inspector General's Office (IGO). Depending on the seriousness of the allegation, the IGO, in consultation with the NGO, will determine the most appropriate course of action to take. One option, agreed by UNHCR and the implementing partner, will be a joint investigation. Whether UNHCR or the NGO partner will take the overall "lead" for a specific investigation will be determined on a case-by-case basis, taking into consideration respective organizational capacities and the nature of the allegation.

28. **Appointment and Composition of Investigation Team:** In the case of a joint investigation, the Head of the UNHCR Investigation Service and the Head of (name of NGO) are responsible for appointing the Joint Investigation Team. Team members may come from UNHCR, the NGO, or a pool of properly trained and qualified investigators. To ensure objectivity and accountability, the Investigation Team shall comprise a minimum of two persons, one lead investigator and one investigator, and where feasible one male and one female.

Both investigators will keep all information relative to the investigation in the strictest confidence and will agree to sign a Confidentiality Agreement (**ANNEX 2**)⁸ whereby each investigator agrees that any information or evidence to surface during the investigation will be shared only with UNHCR and the relevant Head of (name of NGO).

29. **Responsibilities of the Joint Investigation Team:** The appointed Joint Investigation Team is responsible for the following:

- Developing a clear and comprehensive investigation plan (**template found as ANNEX 3.**)
- Conducting the investigation in accordance with the investigation guidelines and procedures of UNHCR and the NGO. **NOTE:** Where the respective Guidelines and procedures conflict or diverge, UNHCR and the NGO will agree on the course of action to follow before the investigation, as determined on a case-by-case basis.
- Evaluating and making recommendations on the needs of the victim and witnesses.
- Reporting the conclusions of the investigation and the investigation process to the Head of the UNHCR Investigation Service and the Head of (name of NGO).
- Producing an accurate and comprehensive report of the investigation.

⁸ The NGO partner may have its own Oath of Confidentiality or equivalent document, which the NGO member of the Joint Investigation Team may sign.

30. **Reporting to UNHCR and the NGO:**

Throughout the course of the investigation the lead investigator shall keep the Head of the UNHCR Investigation Service and the Head of (name of NGO) informed of any and all developments which the investigator believes may have consequences which reach beyond the scope of the investigation. In particular, the lead investigator will report immediately suspected threats by the subject of the allegation or others associated with the subject as well as any development which suggests that the survivor or other witnesses are being threatened.

- **Investigation Report:** The lead investigator will ensure that a final report of the investigation is produced which contains the following:

Structure of the Investigation Report:	
Background	
(i)	Allegation(s)
(ii)	Legal framework
(iii)	Methodology
(iv)	Investigation findings
(v)	Investigation conclusions

Both parties will keep an internal, confidential record of the investigation report.

- **Closure report:** This report outlines the facts established during the investigation that do not substantiate or refute the reported misconduct. It contains a description of the alleged misconduct, the investigative methodology, and the established facts that justify a conclusion that the case should be closed.

31. Other aspects of joint investigations, including responsibilities and qualifications of the investigators, and use of interpreters, are found in the ToR for Joint Investigations.⁹

F. The NGO Investigation Specialist Roster

32. The NGO Investigation Specialist Roster (NGO-ISR) is administered on behalf of UNHCR and its NGO partners by the Danish Refugee Council. The aims of the NGO-ISR are to strengthen both UNHCR / NGO cooperation in 3rd party investigations as well as the accountability and quality of the performance of UNHCR's partners. The NGO-ISR is available to UNHCR's NGO partners where the partner does not have the capacity to carry out its own investigations, to ensure that allegations of misconduct of NGO staff, notably in cases such as sexual exploitation and abuse, fraud, corruption, programme management, procurement, etc., are expeditiously pursued, and the necessary investigations carried out.

⁹ Footnote for editor: A link should be created to the ToR.

Anyone having concerns or suspicions about possible misconduct by staff of any of UNHCR's implementing partners, regardless of their position, may report such concerns directly to:

1. The Headquarters of the NGO partner;
2. UNHCR's Office of the Inspector General (IGO).

Email: inspector@unhcr.org

Fax: +41 22 739 7380

Tel.: +41 22 739 8844

Mail: The Inspector General's Office (IGO)

UNHCR

94, rue de Montbrillant

1202 Geneva / Switzerland

When there is a need for an external investigator from the NGO-ISR, the Roster Coordinator at the DRC, Ms. Lotta Ljunggren should be contacted:

E-mail: lotta.ljunggren@drc.dk

Tel. : +45 33735351

On line request form : Isr.drc.dk

Mail: The Danish Refugee Council

Borgergade 10, 3 th,

Copenhagen, DK 1300, Denmark

Note: Allegations of misconduct of UNHCR staff members continue to be addressed solely to UNHCR's Inspector General's Office.

ANNEX 1

**REFERRAL OF CASES OF POSSIBLE MISCONDUCT
MODEL REFERRAL FORM**

Organization making the referral: _____ **Date referred:** _____
Referral made to (name of organization): _____ **Date received:** _____

Name of person reporting the alleged incident: _____ **Nationality:** _____
 Address/Contact details: _____ Age: _____ Sex: _____

Name of victim (if different from person reporting the alleged incident): _____ **Nationality:** _____
 Address/Contact details: _____ Age: _____ Sex: _____

Name of person accused of the alleged incident: _____ **Nationality:** _____
 Job title: _____
 Organization: _____
 Address/Contact details: _____ Age: _____ Sex: _____

Brief description of incident(s)/allegation(s) (attach extra pages if necessary):

Date of Incident(s): _____ Location of Incident(s): _____
 Summary: _____
 Witnesses' names and Contact Information: _____

Action(s) taken by the organization (if any) since the incident:

Have the police/local authorities been contacted regarding this incident/allegation

YES

NO

If yes, what happened?

If no, does the victim want police assistance, and if not, why?

Are there any immediate medical or security concerns to take into account?

Reason for referral of this case:

Name of person making the referral: _____

Position: _____

Organization: _____

Date: _____



Inspector General's Office / Bureau de l'Inspecteur général

CONFIDENTIALITY AGREEMENT¹⁰

I, the undersigned, shall exercise the utmost discretion with regard to my involvement in the work of the Inspector General's Office (IGO). I will keep confidential all information related to IGO investigations to which I have access in the course of my official duties and otherwise, and/or known to me by reason of my assisting the IGO. I shall not use such information for private gain, or to favour or prejudice any third party.

I undertake to carry out my duties in accordance with the provisions of the Inter-Office Memorandum N°009 / Field Office Memorandum N°010/2012 of 7 February 2012 on "The role, functions and *modus operandi* of the Inspector General's Office". I have read and understood the said IOM/FOM. If in doubt in the course of my duties, I shall seek the advice of the Inspector General's Office exclusively.

I understand that this declaration will remain in force after the completion of my assignment with the Inspector General's Office and/or with UNHCR. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct, and that the signed original of this declaration will be held by the Inspector General's Office.

Name & Title:

Signature:

Date: Place:

To be filled out by the Officer before whom the oath is taken:

Name & Title:

Signature:

Date: Place:

Reason for taking the oath¹¹:

.....

¹⁰ To be signed by UNHCR staff members, consultants, translators, and others, required to assist the Inspector General's Office in the conduct of investigations and/or who have access to confidential information related to the work of the Inspector General's Office.

¹¹ Indicate INV Case N° if applicable, or briefly describe the reason for taking the oath.

Inspector General's Office / Bureau de l'Inspecteur général

This document is protected by the provisions of IOM/009/2012 – FOM/010/2012 of 7 February 2012, concerning the confidentiality of the proceedings related to a preliminary joint investigation conducted by the UINHCR Inspector General's Office and (NGO).

MODEL INVESTIGATION PLAN

INV Case No:	INV/2012/
Implicated Personnel:	
Department/Mission:	
Investigation Plan date:	
Investigator(s)	

1. Allegations

{A brief summary of the reported misconduct, including circumstances relevant to the matter being investigated}

2. Applicable legal norms

{State applicable regulations/rules/law pertaining to the reported misconduct}

3. Implicated personnel

{State personnel information from DHRM records, including contractual status; current assignment; appointment expiration date; and other employment issues affecting availability of implicated personnel}

4. Work Plan steps and timelines**A. INVESTIGATIVE ACTION**

{Identify interviewees, their contact details and a tentative schedule. Also, address issues of availability, order of interviews and special needs (e.g. interpreter, guardian} See Annex 1

B. EVIDENCE / RECORDS PRESERVATION AND COLLECTION

{Identify known and possible sources of evidence and specify means/process for securing those sources and collecting records – i.e. DHRM files, electronic data etc.} See Annex 2

5. Travel / mission plan

{Proposed missions - Include travel dates, length, purpose, location(s), number of investigator(s) required, support required from mission, provide an estimation of costs}

6. Resources

A. EQUIPMENT / INVESTIGATION TOOLS

- B. For the proposed missions & the investigation. List required equipment, including laptop computer; portable printer; external hard drive; flash drive; digital camera; digital audio recorder; hard disk cloning software; SIM card reader/back-up; evidence bags/seals}

Equipment	Explanation	Date required
Laptop	Required for investigation mission	<input type="checkbox"/>
Cell phone	N/A SIO already has been issued cell phone	<input type="checkbox"/>
Portable printer	N/A	<input type="checkbox"/>
Portable scanner	N/A	<input type="checkbox"/>
Digital camera	Required for investigation mission	<input type="checkbox"/>
Audio recorder	Required for investigation mission / batteries	<input type="checkbox"/>
External hard drive	N/A	<input type="checkbox"/>
Hard driver cloning	N/A	<input type="checkbox"/>
SIM card reader	Required upon return from investigation mission	<input type="checkbox"/>
Evidence bags / seals	Required during investigation mission as cell phones and other evidence will be obtained.	<input type="checkbox"/>
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B. FORENSICS / EXTERNAL EXPERTISE

{List any forensic/external support or specialized forensic equipment required for the investigation.}

Type of evidence	Explanation	Date obtained
		<input type="checkbox"/>
		<input type="checkbox"/>

7. Potential risks

A. RISKS TO THE ORGANIZATION / INVESTIGATION

{Identify any risks to the Organization arising from the investigation and indicate any possible solutions to address those risks.}

Type of risk	Explanation / solutions	High / Medium / Low

B. RISKS TO INDIVIDUALS

{Identify any risks to individuals involved in the investigation, including investigators, other UNHCR staff, victims(s), subject, witnesses, local population, etc. Also discuss any possible solutions to address those risks}

Type of risk	Explanation / solutions	High / Medium / Low
		Medium
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C. OTHER RISKS

{State any other risks and possible solutions to address those risks}

Type of risk	Explanation / solutions	High / Medium / Low

ANNEX 1. PROPOSED INTERVIEWS

No.	Name/Position	Status (subject, witness, victim, etc.)	Contact Info (phone and e-mail)	Purpose of Interview	Tentative date/avail ability

ANNEX 2. COLLECTION OF EVIDENCE / RECORDS

No.	Evidence / Records to be Collected	Means of Collection / Contact Point	Date Completed

Assigned Investigator:

Date:

Investigation Plan approved by:

Ruvendrini Menikdiwela

Head of Investigation Service

Head of Investigation Department

UNHCR

(name of NGO)

Date: