



**Final Report of the Independent Review of Mechanisms and Procedures to Ensure Adherence by  
UNRWA to the Humanitarian Principle of Neutrality (20 April 2024)**  
**UNRWA Preliminary Response**

### **Background**

On 5 February 2024, the Secretary-General of the United Nations, in consultation with the UNRWA Commissioner-General, appointed an Independent Review Group to identify and assess the mechanisms and procedures that the Agency currently has in place to ensure neutrality and to respond to allegations of breaches thereof. The Review Group was also expected to present recommendations for the improvement and strengthening of these procedures, taking into account the particular operational, political and security contexts in which UNRWA works. The report was commissioned following an increase of allegations related to the neutrality of UNRWA personnel, installations, and operations since the onset of the conflict in Gaza in October 2023.

The Independent Review Group was led by Catherine Colonna, former Minister of Foreign Affairs of France, who worked with three renowned research organizations: The Raoul Wallenberg Institute of Human Rights and Humanitarian Law (Sweden), the Chr. Michelsen Institute (Norway), and the Danish Institute for Human Rights.

### **UNRWA's Preliminary Response**

**UNRWA welcomes the recommendations of the report and is fully committed to implementing these recommendations.**

UNRWA also welcomes the report's finding<sup>1</sup> that the Agency "has established and updated a significant number of policies, mechanisms and procedures to ensure compliance with the obligation to uphold the principle of neutrality". UNRWA also welcomes findings that the Agency has mechanisms and procedures "to ensure rapid and adequate responses to allegations or indications of breaches" of the principle of neutrality and to "determine and implement disciplinary sanctions on personnel found to breach the neutrality principles". The report notes that UNRWA "possesses a more developed approach to neutrality than other similar UN or NGO entities"<sup>2</sup>. It also confirms that between 2022 and 2024, the Agency "has reviewed all external allegations of breaches of neutrality and opened investigations where it has found prima facie evidence of misconduct"<sup>3</sup>.

Throughout the report, the shared responsibility of UNRWA and Member States, particularly host

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<sup>1</sup> Page 34

<sup>2</sup> Page 3-4

<sup>3</sup> Page 11

countries and Israel (as an occupying power), to preserve the Agency's neutrality is acknowledged. This is particularly true as UNRWA, like any other UN Agency, "does not have policing, military or wider investigative capacities, and competencies"<sup>4</sup>. The report notes that the neutrality challenges that UNRWA faces are "stemming from the operational, political and security environment in which it operates"<sup>5</sup> and "differ from those of other international organizations due to the magnitude of its operations, with most personnel being locally recruited and recipient of UNRWA services"<sup>6</sup>. UNRWA's financial situation and the security context in which it operates are mentioned several times, including in relation to installation checks and training of staff, as challenges to UNRWA's efforts in the area of neutrality. UNRWA welcomes the report's endorsement of the Agency's irreplaceable and indispensable role for the human and economic development of Palestinians and the present humanitarian response in Gaza, where UNRWA is a humanitarian lifeline<sup>7</sup>.

**The Review Group identified several areas that can strengthen UNRWA's work on neutrality and made 50 recommendations** addressed mainly to UNRWA, but also to the UNGA Advisory Commission on UNRWA, Host countries, Israel and the Inter-Agency Standing Committee (IASC). The recommendations cover eight areas related to engagement with donors, governance, management and internal oversight, neutrality of staff, neutrality of installations, education, staff unions and enhanced cooperation with UN Agencies. The report notes that "given the uniqueness of this political context [operational, political and security environment in which the Agency operates], these measures will have a significant impact only with the support of Host countries, Israel and the Palestinian Authority"<sup>8</sup>.

The below provides an overview of UNRWA's preliminary responses to the recommendations:

**Engagement with donors:** UNRWA is fully committed to strengthening its communication, transparency, and consultation with its partners on its financial situation and neutrality issues. UNRWA will implement the recommendation to increase engagement in donor capitals as well as with Member States representations in New York and Geneva. In February 2024, UNRWA notified partners that it would start strategic briefings on integrity in Quarter 2 of 2024, following UN best practices.

The recommendation under this heading will be taken forward by the Executive Office and the External Relations and Communications Department (ERCD).

**Governance:** UNRWA welcomes the recommendations addressed to the Advisory Commission on UNRWA (AdCom). UNRWA concurs with the report's assessment that political support from Member States is critical to effectively address neutrality challenges. The Agency welcomes further engagement with the Advisory Commission on these and other strategic matters at the Geneva and/or New York level.

The two recommendations will be taken forward by the Executive Office in consultation with the AdCom.

**Management and Internal Oversight:** The report commends UNRWA's management and internal oversight reform efforts undertaken since 2020 and recommends bolstering and modernizing such mechanisms and procedures further, building upon the action plan on strengthening oversight,

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<sup>4</sup> Page 25

<sup>5</sup> Page 4

<sup>6</sup> Page 3

<sup>7</sup> Page 3

<sup>8</sup> Page 4

accountability and internal controls shared with Advisory Commission members in March 2020. With donor support, important steps have already been taken to strengthen the capacity of the Department of Internal Oversight services (DIOS) and the Ethics Office, centralize investigation functions, and significantly strengthen UNRWA's Enterprise Risk Management System. UNRWA will continue to prioritize internal reforms, which will also address the reports' recommendations. UNRWA also takes note of the request from several donors to further strengthen project management and monitoring measures given the challenging operational context and will discuss this with interested donors.

The 15 recommendations under this heading will be taken forward by DIOS, Ethics Office, Department of Planning, Department of Human Resources, Digital Impact, Technology and Innovation Department (DITID), and the Executive Office.

**Neutrality of staff:** The report confirms that the Agency has a comprehensive set of rules, regulations, policies, guidelines and procedures in place to support the neutrality of staff, including training, screening and vetting of UNRWA personnel prior to and during employment. UNRWA welcomes the recommendations to further strengthen existing mechanisms related to neutrality of staff, recognizing also the role of host countries and Israel, as well as the need to reinforce training and engagement with personnel and managers. The Agency also welcomes the report's recommendation to further invest in staff care, recognizing the difficult environment in which our personnel works and the direct impact of violence on colleagues and relatives.

The 10 recommendations under this heading will be taken forward by the Department of Legal Affairs, the Ethics Office, the Department of Human Resources, Protection Division, ERCD and the Relief and Social Services Programme (RSS).

**Neutrality of installations:** The report reaffirms the shared responsibility of UNRWA and Member States related to the inviolability of UN premises and confirms that UNRWA has policies and procedures in place to inspect all installations and inform relevant actors, including donors, host countries, and Israel when critical breaches occur. The Agency welcomes the recommendations to implement further preventive measures and enhance monitoring and transparent reporting.

The 5 recommendations under this heading will be taken forward by the Protection Division and ERCD.

**Education:** The report confirms that the Agency has a range of mechanisms in place to ensure that teaching in UNRWA schools is in line with UN values and UNESCO standards, including the review of all hosts' textbooks, the Critical Thinking Approach, and the Digital Learning Platform. The Agency welcomes the opportunity to work with UNESCO and host countries on textbook matters. The Agency reaffirms its existing prohibition on using any education material from hosts' textbooks that would promote hate and violence.

The 8 recommendations under this heading will be taken forward by the Education Department, Department of Human Resource and DIOS.

**Staff Unions:** The Agency welcomes all recommendations that can both strengthen neutrality and staff representation, including the report's recommendation to update the Statute of UNRWA Unions, ensure greater gender representation – issues already raised by the Agency's management with the Inter Staff Union Council and the Advisory Commission – as well as recommendations regarding vetting. The Agency

will also continue supporting the Women Advisory Forum, launched in 2022, which is a platform for female staff across the five fields to discuss needs and ideas to empower female staff.

The 6 recommendations under this heading will be taken forward by the Executive Office, Field Directors, and the Department of Human Resources.

**Enhanced Cooperation with UN Agencies:** UNRWA welcomes opportunities to further strengthen partnerships with other UN Agencies, Funds and Programmes, while respecting its mandate received from the UN General Assembly. UNRWA will continue to enhance and support engagement with existing humanitarian coordination mechanisms in Gaza and other areas of operation and will seek to build on existing partnerships with sister UN agencies, including WFP, UNICEF and IOM in Gaza to strengthen the humanitarian response.

The 3 recommendations under this heading will be taken forward by the Executive Office and Field Directors.

### **UNRWA's Next Steps in Implementation of the Recommendations**

UNRWA has set up an internal task force, led by the Deputy Commissioner-General (Operational Support), to oversee the implementation of recommendations addressed to the Agency. Departments and Offices charged with the responsibility to take recommendations forward will establish priorities, action plans, timelines, and budgets. These will be consolidated into a high-level Agency-wide Action Plan that UNRWA will roll out in response to the recommendations. This Action Plan will include ongoing initiatives in line with the recommendations as well as actions that can be implemented immediately. The Plan will also indicate which recommendations will require additional financial resources and/or the support of Hosts and Member States for their successful implementation.

UNRWA notes that some recommendations may take time to implement or may be dependent on support and cooperation from other entities and partners. The implementation of some recommendations will require political support from Member States, including host countries and Israel, as noted in the report.

UNRWA highlights that several recommendations will require additional financial and human resources, including fixed term international and area staff, to enable successful implementation and sustained impact. UNRWA's Action Plan must, therefore, include a budget. UNRWA plans to seek donor support through pooled-funding arrangements to allow for more effective and efficient use of resources and efficient and timely reporting on progress achieved.

UNRWA recognizes that the recommendations are closely associated with ongoing or planned modernization efforts the Agency has committed to in its 2023-2028 Strategic Plan. These change initiatives, as well as the earlier action plan on oversight, accountability and internal controls, will need to be harmonized with and possibly incorporated into the high-level Agency wide Action Plan to allow for comprehensive oversight of the planned initiatives to further strengthen UNRWA, both in terms of stronger approaches to the principle of neutrality, as well as key areas related to oversight, risk management, accountability, and organizational effectiveness.

UNRWA aims to share the aforementioned Action Plan and indicative budget with partners in the next weeks. We will establish a team in the Executive Office to monitor the implementation of the Action Plan and will be looking at support from Member States in the form of secondments.