

UNHCR Evaluation Management Response			
<b>Evaluation title:</b>	UNHCR Country Strategy Evaluation- Peru 2019-2023		
<b>UNHCR evaluation reference:</b>	EVO/2024/09		
<b>Entity that commissioned the evaluation:</b>	Evaluation Office		
<b>Due date of Management Response:</b>	11 December 2024		
<b>Coordinator of Management Response:</b>	Laura Almirall	Representative	Peru Country Office
<b>Management Response approved by (senior manager in commissioning office):</b>	Jose Samaniego	Director	Regional Bureau for the Americas
<b>Submission date:</b>	18 December 2024		

<b>General comments on the evaluation:</b>	
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<b>RECOMMENDATION 1:</b>	Continue to provide technical and resource support to the CEPR in order to clean up the asylum claims database, reduce the backlog and strengthen the quality and credibility of the national asylum system.				
<b>Management response:</b>	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>					
<b>Unit or function responsible:</b>	Protection				
Top-line planned actions	By whom	Comments	Expected completion date	Progress	
				Status	Comments
1 Supported the drafting of the refugee bill.	Protection Unit	UNHCR has submitted a draft refugee bill to the Ministry of Foreign Affairs. The draft served as the working document for the Committee set up between CEPR (Ministry of Foreign Affairs) and SNM (Ministry of Interior) to submit a bill to Congress. The bill included changes to registration and refugee status determination procedures.	13.06.24	Completed	Negotiation within the GoP continues and the bill has not been finalized yet.

2	Undertaken analysis of new rules and regulations impacting on the asylum regime and produced key advocacy messages.		UNHCR has studied amendments to rules and regulations on access to the territory, to services and rights by foreigners and has produced advocacy messages which were shared with selected Embassies, donors, UN Agencies and trusted partners.	Ongoing	Ongoing	Amendments passed by Congress in August, Sept, Oct and Nov 2024.
3	Supported GoP's efforts to clean up the asylum database (QORICANCHA II)	Protection Unit	UNHCR supported GoPs efforts to cross check MOFA and Migration databases to identify please who had exited the country. MOFA also eliminated duplicates from their system which resulted in a 23% reduction of the asylum backlog.	Nov-Dec 23	Completed	
4	Supported the GoP with the self-validation exercise of asylum claims launched before 2024.	Protection Unit	UNHCR supported the CEPR with the self-validation exercise providing technical guidance, resources, and a communication campaign.	Completed on 1.10.24.	Completed	
5	Developed a concept note and workplan to adjudicate validated asylum claims.	Protection Unit	UNHCR provided technical assistance to develop a Concept Note to define next steps upon completion of the self-validation exercise. UNHCR contributed to the development of a Work Plan and the required tools to process self-validated claims through a simplified RSD mechanism. UNHCR provided additional funds to hire required personnel and adequate further interview rooms for the simplified RSD mechanism.	Completed on 20.10.24	Completed	Concept Note and Work Plan approved by GoP 19.11.2024
6	Organized COI sessions	Protection Unit	COI sessions on Venezuela, Colombia, Ecuador and Haiti organized with colleagues in relevant operations. Officials from MOFA and Migration attended the sessions.	Sept-Nov 24	Completed	
7	Strengthened cross-border analysis	Protection and Field	UNHCR Peru coordinated with UNHCR Colombia and Ecuador to understand trends and prepare for changes.	Ongoing	Ongoing	
8	Supported MOFA with contingency planning.	Protection Unit	UNHCR participated in regional exchanges as well as national gatherings to assess mixed movements	15.08.24	Completed	

			following the 28 July Presidential Elections in Venezuela. UNHCR and CEPR visited Tumbes, main entry point for Venezuelan nationals, and gathered information with local institutions and cooperation actors. As a result, UNHCR provided technical assistance to the CEPR to elaborate a Contingency Plan for massive influxes of refugees.			
9	Strengthen Communication with Communities on asylum and protection.	Protection Unit	UNHCR prioritized communication on the validation exercise with almost 1 million WhatsApp and emails. More needs to be done on access to rights and services.	Ongoing	Partially completed	
<b>RECOMMENDATION 2:</b>		Promote closer articulation of the WGRM with national migration governance mechanisms (MTIGM) and sectoral ministries, in collaboration with IOM, WGRM members and public administrations.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>		Inter-Agency (IA) Unit with support from Senior Management				
<b>Top-line planned actions</b>		<b>By whom</b>	<b>Comments</b>	<b>Expected completion date</b>	<b>Progress</b>	
					<b>Status</b>	<b>Comments</b>
1	Promoted closer relations between the WGRM and the MTIGM through regular bilateral meetings between the two platforms.	IA Unit with the support of Senior Management	The collaboration between the WGRM and the MTIGM has been strengthened through regular bilateral meetings where common priorities and actions will be identified and undertaken. Key points of collaboration can include alignment of data and information systems and capacity building of institutions among others.	30.06.25	In progress	
2	Ensured that, at least, one more state entity co-leads one of the GTRM sectors.	IA unit	In Jan 2024 two ministries were co-leading GTRM sectors (Ministry of Health and Ministry of Education). By Dec 2024, the Ombudsman Office (Defensoría del Pueblo) will co-lead the Protection Sector. With this addition, 60% or 3 out of 5 of the subgroups will be co-led by a state entity.	Completed	Completed	Defensoria accepted to co-lead the Protection sector on 20.11.2024.
3	Prepare a joint yearly workplan between UNHCR and IOM for the coordination of the GTRM	IA unit	In 2024, UNHCR and IOM agreed on a joint expenditure plan for the GTRM. UNHCR hopes that in 2025, this plan could develop into a joint workplan, the two organizations will identify joint actions and a clearer distribution of responsibilities.	31.03.25	In progress	A basic workplan was drafted for 2024. A more complete one

						will be drafted for 2025.
<b>RECOMMENDATION 3:</b>		Consolidate cross-functional work between units (e.g. protection, CBI, programmes, livelihoods) and with partners in order to harmonise the protection approach.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>		Protection Unit/CBI focal point				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	Reviewed SOPs on Multipurpose Cash and Cash for emergency protection cases.	Protection & CBI	<p>SOP were revised to include prioritized profiles and provisions on SEA prevention and response. Reviewed SOP include segregation of roles between case managers and cash approvers.</p> <p>SOPs on CBI for emergency protection cases have been developed.</p>	Completed	Completed	
2	Developed a protection guidance note on cash for unaccompanied and separated adolescents	Protection & CBI	A protection guidance note was created to grant cash for unaccompanied and separated adolescents, by contextualizing the global guidance to Peru context	Dec 24	Pending review	Pending Representative's approval
3	Assessed with cash actors the complementarity of UNHCR's programmes, revised exclusion mechanisms, defined cash-transfer amount, and duplication detection strategies.	CBI	<p>A mechanism was developed by the Cash Working Group (CWG), co-led by UNHCR, to avoid duplication, considering that there are 23 organizations that provide cash.</p> <p>UNHCR has identified high-risk profiles for exceptions to exclusions agreed in the CWG.</p> <p>The CWG is updating the minimum expenditure basket to refine the maximum cash transfer amount.</p>	Completed	Completed	
				Ongoing	Ongoing	
4	Revise SOPs on case management and sustain regular meetings of the Case Management Committee	Protection CBI	SOPs on case management were updated to increase referrals to the FO in Lima and to our current partners according to their capacities in 2024.	October 24	Completed	

			UNHCR chaired regular meetings of the Case Management Committee to review and assess complex cases.	Ongoing	Ongoing	
<b>RECOMMENDATION 4:</b>		Promote human mobility and protection on the municipal agenda, strengthening advocacy with local governments and the capacities of community-based organisations.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>						
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	LoUs signed with selected municipalities, regional government and local public institutions.	Field	<p>Dialogue with regional and local governments focusing on the socioeconomic and cultural integration of forcibly displaced people, and their access to rights and services was strengthened. This led to the signing of several LoU in areas of high concentration of refugees. LoU signed:</p> <p><b>Lima and Callao:</b> Municipality of Carmen de la Legua; Municipality of San Juan de Lurigancho; Municipality of Chorillos; UGEL 07; UGEL 02; DIRIS Lima norte; DIRIS Lima centro.</p> <p><b>Arequipa:</b> Regional Health Management.</p> <p><b>Tacna:</b> Regional Government; UGEL.</p> <p><b>Puno/Desaguadero:</b> Desaguadero District Municipality.</p> <p><b>Madre de Dios:</b> Regional Health Directorate.</p> <p><b>Tumbes:</b> Provincial Municipality of Tumbes; District Municipality of Aguas Verdes; Local Educational Management Unit Zarumilla; Regional Government of Tumbes; Regional Health Directorate Tumbes; District Municipality of Canoas de Punta Sal.</p>	31.12.24	Completed	Other LoU will be negotiated and signed according to the Country Strategy.

			<b>Trujillo:</b> Regional Health Management of La Libertad; Regional Education Management of La Libertad; Regional Development and Social Inclusion Management.			
2	Grants to RLO	Field & CBP	<p>In 2024, UNHCR signed 10 Grant Agreement with CBOs, many of them led by refugees.</p> <p><b>Grants implemented:</b></p> <ul style="list-style-type: none"> <li>• Veneica, Ica, Legal, community</li> <li>• Sisters of Mercy, Puno, Border, Humanitarian assistance</li> <li>• Migrant Movement, Lima, GRD/ education</li> <li>• El Cirineo, Lima Legal (civil, criminal, administrative)</li> <li>• APPV, Lima, Women's leadership, GBV prevention</li> <li>• Engadi, Lima, Education, NNA</li> <li>• RICH, Trujillo, Education, NNA</li> <li>• Rosas Women of Struggle, Lima, GBV care</li> <li>• BETESDA, Lima, Disability, Sports</li> <li>• Angeles del Camino, Arequipa, Community, social work</li> </ul> <p><b>Grants that will be implemented in 2025:</b></p> <ul style="list-style-type: none"> <li>• Club Cuba Peru, Lima, Sports, NNA</li> <li>• Sisters of Redemption, Trujillo, Health, Mental health</li> <li>• Innovative Solutions for Social Impact Association, Mother of God Peaceful Coexistence</li> <li>• Softball League from Arequipa, Arequipa, Sports, NNA</li> <li>• VEO, Trujillo Senior Citizens, Health, Integration.</li> </ul>	31.12.24	Completed	
3	Replicate the Protection Spaces model in other cities	Field & Protection	In May 2023, in response to the request of the SNM to support the regularization process, UNHCR provided such support through human resources, equipment and facilities, activating four decentralized offices in the districts of San Juan de Lurigancho,	31.12.2025	Partially completed	Expansion of these spaces is being considered for

			<p>San Martín de Porres, Chorrillos and Villa María del Triunfo, areas of Lima with a high concentration of Venezuelan population.</p> <p>In this context, with the support of partner Encuentros, UNHCR opened Protection Spaces which focused on provision of protection, documentation, and orientation services. These Spaces count with staff deployed from the Refugee Commission as well as the SNM and served up to date over 30,000 persons of concern.</p>			2025 to other locations in and outside Lima (Ica, Arequipa and Trujillo).
<b>RECOMMENDATION 5:</b>		Expand UNHCR's advocacy on livelihoods, establishing partnerships with development actors, financial institutions, public administrations related to employment and entrepreneurship, and the private sector to promote the recruitment of refugees and migrants.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>						
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	MoU with Ministry of Labour	Livelihoods	UNHCR is negotiating a framework agreement with the Ministry of Labor to ensure that refugees are included in economic inclusion programs.	28.02.25	In progress	
2	Replicate successful labor access programs from other operations in the Region	Livelihoods	UNHCR identified a partner for implementation in 2025, which is UNHCR Brazil's employment partner. UNHCR Peru will replicate a small pilot project, considering their lessons learned and best practices.	Ongoing	Ongoing	Partner selected and project to be launched in 2025.
3	Collaborate with local governments and their Economic Development Departments.	Livelihoods	UNHCR is working with local Economic Inclusion Departments to strengthen their programs, ensuring refugees inclusion. This process began with a transfer of entrepreneurship methodology to officials from the municipality of San Juan de Lurigancho.	31.12.24	In progress	

4	Conduct a market study to identify economic sectors with high employment potential.	Livelihoods	UNHCR has commissioned a market study aimed at identifying sectors with the highest economic potential and capacity to absorb refugee labor. This study will also map companies within high-demand value chains, providing a strategic focus for private sector engagement and economic inclusion interventions.	31.12.24	In progress	
<b>RECOMMENDATION 6:</b>		Capitalize on local partners' migration expertise (including assistance and protection and their knowledge of diverse local contexts) and streamline procedures for working together.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>						
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	Strengthen the partnership with Encuentros Scalabrini.	Prog & Prot	National partner Encuentros is playing an increasing relevant role in the delivery of UNHCR's field protection activities.  UNHCR also expects to expand shelter activities for which the expertise of Scalabrini will be crucial.	Ongoing	Ongoing	
2	Strengthen monitoring activities to assess impact and quality of our programmes	Prog & MFT	UNHCR has strengthened the number and quality of direct monitoring activities, such as PDM, home visits, participatory assessments and focus group discussions.	Ongoing	Ongoing	
3	Streamline partners' reporting requirements	IM & Prog	UNHCR will join the Osmosys pilot, which will result in simplified and streamlined reporting systems for partners.	2025	Pilot phase	The operation is not requesting partners to report beyond what is included in the standard PFA.
<b>RECOMMENDATION 7:</b>		Build on UNHCR's experience in data generation to strengthen national institutions in characterizing the flows and needs of refugees and migrants, thus promoting inclusive public policies and services.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				



Reasons (if partially agree or disagree):						
Unit or function responsible:						
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	Technical and financial assistance to the 2024 ENAHO (National Household Survey)	IM	<p>At the 2023 GRF Peru made a pledge towards the statistical inclusion of forcibly displaced and stateless persons. As a direct action from this pledge, Peru's National Institute for Statistics and Informatics (INEI), with the support of UNHCR, the World Bank and IOM, has undertaken an extension of its (ENAHO) to an independent sample of Venezuelan population.</p> <p>This extension represents a first step towards a more systematic inclusion of forcibly displaced and stateless persons in Peru's official statistics. Results of the survey will be published in early 2025 and will provide crucial data on living conditions and poverty in a comparable way to the general population.</p>	31.12.24	In progress	
2	Technical and financial assistance to 2025 Census	IM	<p>As part of the same GRF pledge in 2023, Peru has also committed for its coming Census to adequately include refugees and stateless persons. UNHCR is advocating for the Census questionnaire to capture information regarding nationality, civil registration and reasons to enter Peru that will be crucial for analysis.</p> <p>UNHCR will provide support to INEI for data collection and analysis, including through communication campaigns, to ensure that everyone in Peru is included in the Census.</p>	31.12.25	Ongoing	The national Census will be launched in April 2025.
3	Regularly collect data from the field on needs and living conditions	IM	UNHCR will continue to collect data on both persons in-transit and those residing in Peru to provide an up-to-date picture of their profile, needs and living conditions. This will include protection monitoring exercises in Lima and other cities and border	31.12.2025	Ongoing	

			monitoring as part of the regional Mixed Movement Monitoring (MMM) initiative as well as joint needs assessments under the national R4V coordination platform (GTRM).			
4	Regular Post-Distribution Monitoring (PDM) exercises	IM / All technical teams	Regular PDM exercises on CBI, Livelihoods, Inter-Agency, Protection and others will continue.	31.12.2025	In progress	
5	In-depth needs analysis involving other stakeholders	IM	The operation will produce analytical products making use of available evidence regarding the refugee population in Peru. This includes a joint report with the World Bank “ <i>Un encuentro de oportunidades</i> ” based on the results of the 2022 ENPOVE, the Refugee and Migrant Needs Analysis (RMNA) under the GTRM, and an analysis of the upcoming ENAHO extension in 2025.	31.12.2024	Completed	The UNHCR-World Bank report “Un encuentro de oportunidades” was published in November 2024.
6	Support the Carmen de la Legua municipality with the registration of all its inhabitants, including refugees.	IM/ FO Lima	UNHCR supported financially and technically Carmen de la Legua with its registration exercise. This project represents a novel approach to promote the social inclusion of forcibly displaced persons. By partnering with a local municipality and the Ministry for Development and Social Inclusion (MIDIS), UNHCR was able to support the registration of thousands of persons for the targeting system behind Peru’s social programmes. The project is planned to be expanded in other districts in 2025.	31.10.24	Completed	
<b>RECOMMENDATION 8:</b>		Strengthen the capacity of the Lima Field Office to ensure the proper implementation of the urban strategy, presence in critical neighborhoods, dialogue with district institutions and work with communities and social organisations.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>						
<b>Top-line planned actions</b>	<b>By whom</b>	<b>Comments</b>	<b>Expected completion date</b>	<b>Progress</b>		
				<b>Status</b>	<b>Comments</b>	

1	Recruitment of additional staff	Field/FO Lima	<p>FO Lima has been strengthened with the creation of a NOB FTA Head of Field Office (effective Jan 2025), the recruitment of a LICA 6 (Protection), 2 field assistants (LICA 4) and an Admin Assistant (LICA 4).</p> <p>In 2025, FO Lima will be supported with two additional vehicles and drivers (from 1 vehicle to 3) and 2 case management interns.</p>	1.2.225	Ongoing	
2	Work plans with prioritized municipalities within Lima	FO Lima	<p>Several cooperation agreements with prioritized municipalities of Lima and El Callao have been signed during 2024.</p> <p>The agreements with these institutions consider a) the strengthening of institutional capacity to incorporate the attention to forcibly displaced and stateless people into their public policy, b) the strengthening of the human and material capacities that have direct responsibilities in the attention of forcibly displaced and stateless people living in their territories, c) the implementation of inclusive intervention within state's programs for forcibly displaced and stateless populations, d) the improvement of infrastructure in order to optimize the delivery of social services, e) and the implementation of integration, social and cultural projection activities jointly with UNHCR, partners and allies.</p> <p>2025 workplans with each of these municipalities are currently being developed.</p>	31.12.25	In progress	
3	<p>FO Lima has prioritized 8 districts in Lima and Callao.</p> <p>A permanent field presence under FO Lima has been established in Ica.</p>	Field/FO Lima	<p>The area of coverage of FO Lima was established by the operation and includes the department of Lima, Metropolitan Lima, the constitutional province of Callao, and the department of Ica.</p>	Completed Oct 2024	Completed	

			Ica is the fourth region with the highest concentration of Venezuelan nationals. This region does not have a Migration office nor an office of the Ministry of Foreign Affairs, or UN agencies. Due to its strategic importance, UNHCR established a presence with the support of a partner.			
<b>RECOMMENDATION 9:</b>		Strengthen multidisciplinary cooperation, horizontal and vertical communication and closer links between units, offices and levels of the operation to achieve more synergies and cohesion between teams.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>						
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	Weekly meetings for Senior Managers, Heads of Unit and Heads of Field Offices held.	Snr Man, Heads of Unit, & Heads FO	Weekly meetings with senior staff and field colleagues continued.	Ongoing	Ongoing	
2	Internal weekly SitReps introduced	ER	Weekly written report with key developments and activities circulated to all staff.	Ongoing	Ongoing since Aug	
3	Monthly all-staff meetings and opportunity for bilateral informal meetings with the Representative.	Representative	Monthly all staff meeting were introduced in August to reinforce internal communication and transparency about decision making and to offer a direct platform of expression for staff and staff association. In addition, the Representative has made herself available for bilateral meetings at the request of staff. This opportunity has been much appreciated and seized by more than 30 colleagues.	Ongoing	Ongoing	
4	Increased field missions to provide support and guidance from management and technical units	Representative/Deputy Representative	In 2024, BO management and technical units conducted regular field.  Snr Field Coordinator developed a plan to regularly travel on mission with HR and Admin colleagues to all field locations. In addition, a Protection retreat was organized to bring colleagues from the field for two	31.12.24	In progress	

			days to Lima to provide knowledge and guidance to field offices.			
5	HR led events such as PSEA, SH; CoC and Annual team building were organized. and a Peer Advisor election was held.	HR	A team building event was organized to promote more cohesion within the operation, reinforce cooperation among teams and nurture relationships as well as to foster a belonging organizational culture among staff. The annual Code of Conduct Dialogue was organized for the same reasons. Staff-based support was enhanced with the election of 3 peer advisors and of a new Staff association following the end of tenure of the old one. In addition, following the identification of capacitation needs, a full-day training on PSEA and SH was organized for 2 groups of 30 staff, in cooperation with the RBA and HQ. This training will be repeated in 2025 to capacitate the remaining staff.	05.12.2024	Completed	
6	Monthly meetings between the Staff Association and Representative	Staff Ass & Rep	Since August 2024, the Staff Association and the Rep met monthly to jointly find solutions to matters of concern to staff.	Ongoing	Ongoing	
<b>RECOMMENDATION 10:</b>		Continue to promote the "nationalisation" of positions and functions in the operation, and a broad understanding of UNHCR's mandate amongst newly recruited local staff.				
<b>Management response:</b>		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
<b>Reasons (if partially agree or disagree):</b>						
<b>Unit or function responsible:</b>						
<b>Top-line planned actions</b>		<b>By whom</b>	<b>Comments</b>	<b>Expected completion date</b>	<b>Progress</b>	
					<b>Status</b>	<b>Comments</b>
1	Nationalization of positions	HR	With the aim of both further nationalize positions, and strengthen field response in FO Lima, a national HoFO at NOB level was included in the 2025 planification. A NOA Assistant Protection Officer and NOA Assistant Programme Officer, were created for 2024, and are both already incumbered.	Completed	Completed	
2	Enhance working conditions.	HR	HR missions have been organized to FO Tumbes, FU Tacna and each of the field presences to revise working conditions and accessibility to health and	Ongoing	Ongoing	

			welfare. UNHCR is also part of the working group of the OMT focusing on health and welfare, and HR has initiated contact with hospitals and clinics with the aim of signing agreements if possible. 6 months or one-year contracts have been offered to staff on temporary positions anytime performance and budget have allowed it.			
3	A feedback mechanism has been established between HR and Senior Management and the Staff Association	HR	HR has organized various meetings with the Staff Association, responding to the concerns shared in coordination with senior management and has provided due information about complaint management in the frame of the code of conduct.	Ongoing	Ongoing	