



Investing in rural people

Annual Report on IFAD's Investigation and Anticorruption Activities during 2020

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Abbreviations and acronyms

AUO	Office of Audit and Oversight
ETH	Ethics Office
FMD	Financial Management Services Division
ICO	IFAD Country Office
PMD	Programme Management Department
SEA	sexual exploitation and abuse
SH	sexual harassment

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I. Introduction

1. This report presents information on the investigation and corruption prevention activities carried out by IFAD's Office of Audit and Oversight (AUO) in 2020. Information is also provided on investigation outcomes and sanctions, on outreach and cooperation efforts, and on the use of staff and other resources.

II. Overview

2. In 2020, AUO received 83 allegations of misconduct or of prohibited practices, an increase from 2019. Of these, 55 per cent related to alleged fraud or corruption in IFAD-financed projects. Notwithstanding the COVID-19-related slowdown in some IFAD-financed operations, AUO received slightly more allegations of fraud and corruption concerning IFAD project activities in 2020 as compared to previous years, confirming the need for continuous vigilance by all parties involved. At the same time, IFAD and AUO stepped up the anticorruption response and addressed many more allegations in 2020 than in previous years, resulting in operational remedial measures or sanctions where substantiated. Although this trend is indicative of the inherent corruption risk in the difficult environments where IFAD operates, it is also a result of the strengthened anticorruption advocacy of recent years, increased visibility of IFAD's reporting channels, and the continued mainstreaming of the Revised IFAD Policy on Preventing Fraud and Corruption in its Activities and Operations, approved by the Executive Board in 2018. IFAD put in place a wide range of timely measures that mitigated the adverse impact of most COVID-19-related risks.
3. As in previous years, most of the external allegations received in 2020 related to project procurement or contract management activities. Several of these implicated project staff/government officials. IFAD has strengthened its procurement oversight capacity in these areas and further capacity-enhancing efforts are in progress. AUO maintains a close working relationship with operations units, including the Programme Management Department (PMD), the Financial Management Services Division (FMD), and the Financial Controller's Division, to proactively mitigate emerging and residual risks relating to such allegations.

III. Investigation mandate and method

4. AUO is mandated to investigate: alleged fraud and corruption involving entities, contractors and non-staff individuals engaged in any activity financed by IFAD; and staff misconduct. AUO investigations are administrative in nature; their purpose is to gather evidence that may either corroborate or refute an allegation. Upon receipt by AUO, an allegation is subject to an intake review. If it falls within the mandate of AUO, a preliminary assessment is performed to determine whether the allegation is credible, verifiable and material. If all three criteria are met, an investigation is launched. It may be determined that an allegation is better suited for referral to other IFAD divisions, outside agencies or governments, either at the preliminary assessment or after an investigation. Investigated allegations are classified upon completion as:
 - **Substantiated:** when sufficient evidence is found to conclude that irregular practices have occurred; if a complaint/case involves multiple allegations and some have been substantiated while others not, the "partially substantiated" classification is applied.
 - **Unsubstantiated:** when the evidence obtained is insufficient either to corroborate or to refute the allegation(s).

- **Unfounded:** when the evidence obtained is sufficient to refute the allegation(s).
5. Substantiated allegations are presented to the IFAD Sanctions Committee, which is composed of IFAD senior managers and chaired by the Vice-President. In cases relating to external parties, the Sanctions Committee will determine the sanction to be applied. Substantiated allegations against staff are first referred to the Human Resources Division to assess the evidence and determine if disciplinary charges are to be served to the staff member; they are then submitted for final review by the Sanctions Committee, which is followed by the issuance of a recommendation to the President as to whether a disciplinary or other measure should be taken.

IV. Investigation activities and prevention of corruption

A. Investigation caseload overview

6. Figure 1 below sets out the trend of allegations/complaints of wrongdoing received by AUO during the last 10 years. Allegations of wrongdoing involving IFAD staff are considered internal cases, whereas allegations connected to contractors or IFAD-financed projects and programmes – including alleged prohibited practices by borrowers or project employees, firms, private entities and other individuals – are categorized as external cases.

Figure 1
Allegations reported to AUO 2010–2020

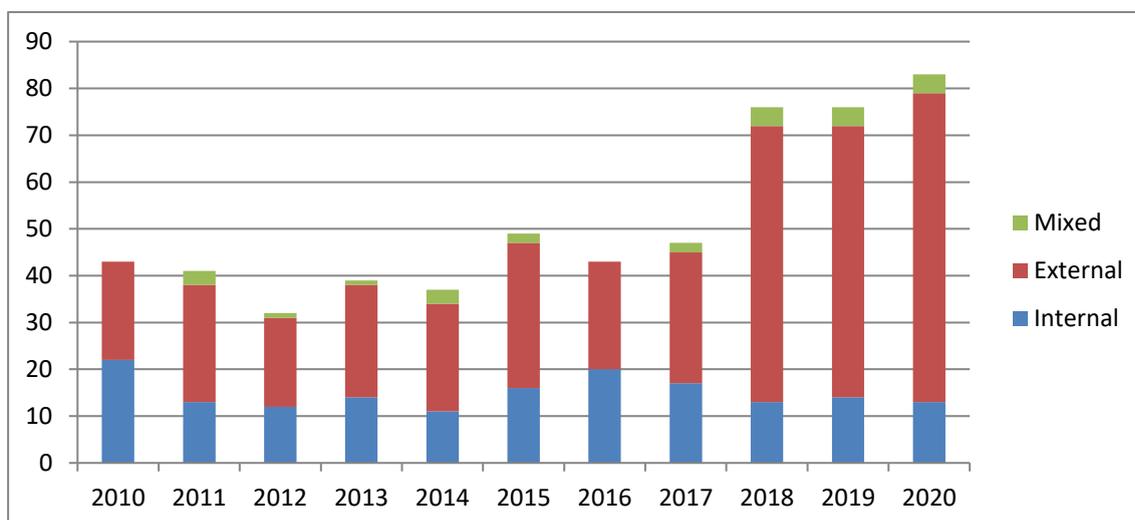


Table 1
Active investigation cases in 2018–2020

	<i>Internal</i>	<i>External</i>	<i>Internal/ external</i>	<i>Total</i>
Cases pending at year-end 2018	2	35	1	38
Cases received in 2019	13	59	4	76
<i>Total active cases in 2019</i>	<i>15</i>	<i>94</i>	<i>5</i>	<i>114</i>
Cases closed in 2019	9	40	1	50
Cases pending at year-end 2019	6	54	4	64
Cases received in 2020	13	66	4	83
<i>Total active cases in 2020</i>	<i>19</i>	<i>120</i>	<i>8</i>	<i>147</i>
Cases closed in 2020	12	62	2	76
Cases pending at year-end 2020	7	58	6	71

B. Salient observations from allegations and investigations in 2020

Project-related cases

7. The receipt of a high number of project-related allegations, a trend that began in 2018, continued in 2019 and 2020, notwithstanding the operational activity slowdown due to the global COVID-19 pandemic. While it is indicative of the inherent risk of corruption in IFAD-funded activities, increased reporting and detection could also be attributable to the continued mainstreaming of the IFAD anticorruption policy, the more prominent field presence of IFAD staff, strengthened fiduciary procurement and financial management supervisory activities and the continued efforts made towards anticorruption communication, and outreach and training activities by AUO, PMD and FMD for IFAD staff and project officials.
8. As in previous years, most of the external allegations received in 2020 related to project procurement activities, and many of these implicated project staff or government officials. Among the cases received in 2020, AUO identified the following patterns:
 - Favours certain bidders based on collusive arrangements between project staff and goods and service providers, due to personal relations or facilitated by bribery or kickbacks;
 - Collusion among bidders to rig bidding processes;
 - Unsuccessful bidders alleging corruption and claiming non-adherence to required procurement procedures as an indication of corruption;
 - Embezzlement of project funds by project staff or implementing agencies; and
 - Submission of falsified travel documentation by project staff and consultants.
9. In the latter part of the year, some allegations were received in relation to the use of funds for COVID-19-related activities.
10. As noted above, IFAD has taken significant steps to strengthen its procurement procedures and related oversight framework in recent years, but further improvement is needed, in particular in allocating sufficient time and expert resources to reviewing project procurement actions. This is more relevant for COVID-19-related activities since these entail higher risks in that the normal planning and supervision controls are adjusted to reflect shorter time frames and remote working arrangements.

Internal cases and cases including sexual harassment (SH) or sexual exploitation and abuse (SEA)

11. The number of complaints received by AUO in 2020 involving staff (mixed/internal) matched that of 2019 and related to a variety of potential wrongdoing including, inter alia, undeclared conflicts of interest, misrepresentation, fraud and improper use of authority. One internal complaint related to SH and no complaints related to SEA. Several serious staff cases were concluded in 2020 involving fraud or SH, leading to the dismissal of four staff members.

C. Investigation caseload in 2020

New allegations in 2020

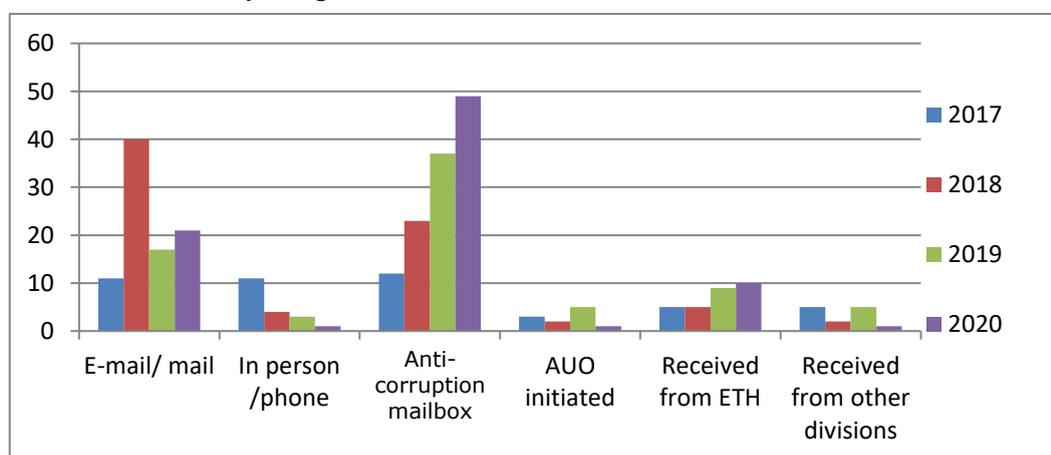
12. Table 2 provides information on the nature of the allegations received in 2020.

Table 2
Nature of allegations received

<i>Nature of allegation</i>	2019	2020
External		
• Violations of IFAD's anticorruption policy (fraudulent, corrupt, collusive, coercive and obstructive practices)	45	47
• Violations of the Code of Conduct by IFAD consultants	-	1
• Violations of IFAD's SEA/SH policy	1	-
• Other (including bid/contract disputes, recruitment issues and other operational issues not falling within IFAD's anticorruption policy scope)	13	18
Internal (or mixed internal and external)		
• Violations of IFAD's anticorruption policy (fraudulent, corrupt, collusive, coercive or obstructive practices)	5	3
• Violations of IFAD's SEA/SH policy	4	1
• Internal grievance cases	-	1
• Other violations of the Code of Conduct	7	10
• Other (mixed – other misconduct)	1	2
Total	76	83

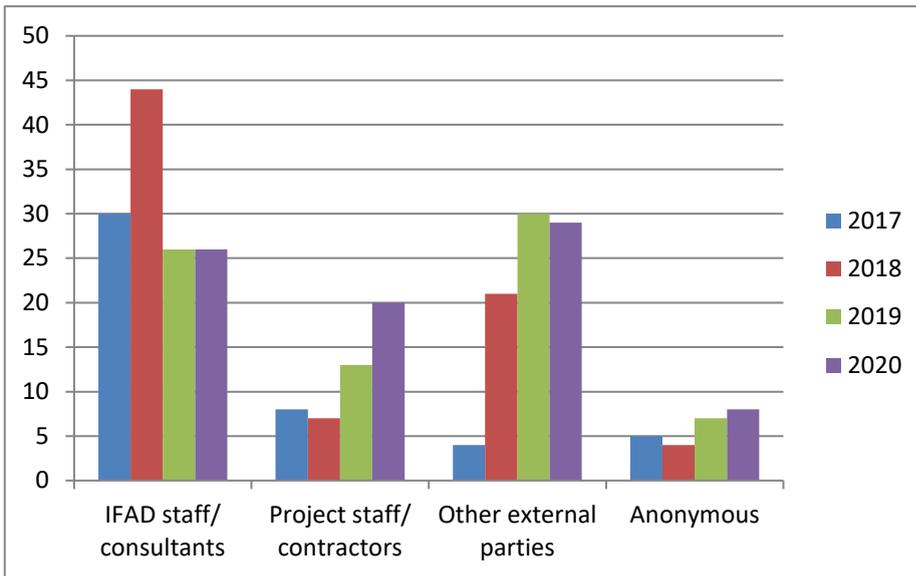
13. As in prior years, the bulk of complaints related to alleged fraud or corruption in IFAD-financed projects. A slight increase was noted in complaints stemming from bid, contract and recruitment disputes, which were generally referred by AUO to PMD to be managed through IFAD's supervisory mechanism.
14. The "other violations of the Code of Conduct" related to various types of alleged inappropriate actions or decisions by staff members. The increase in SEA/SH-related allegations seen in 2019 due to the intensive awareness and SH/SEA prevention efforts of the Ethics Office (ETH) did not recur in 2020, notwithstanding the strengthened awareness efforts and tools and protections available to potential victims. The forced distancing of staff and project partners and beneficiaries due to the COVID-19 restrictions and teleworking requirements may have contributed to this decrease.

Figure 2
Channels used for reporting issues to AUO in 2017–2020



Note: "Received from other divisions" indicates formal referrals by division head.

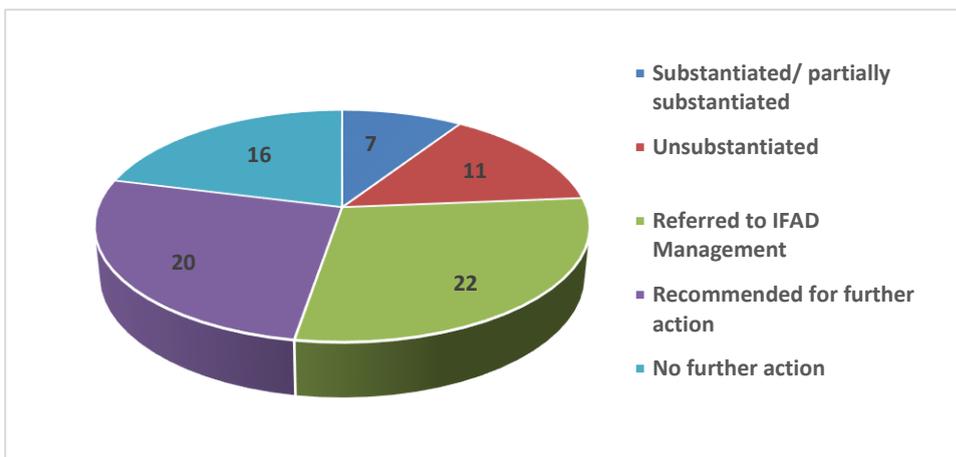
Figure 3
Source of allegations received by AUO in 2017-2020



15. Regarding the source of complaints, figure 2 points to a clear increasing trend in relation to the number of complaints received through the confidential anticorruption mailbox (anticorruption@ifad.org) and directly from project staff, contractors and other external parties as shown in figure 3. This attests to the increasing effectiveness of the PMD, FMD and AUO anticorruption awareness efforts towards project staff, vendors and partners. The remote working arrangements in 2020 probably contributed to the decrease in complaints reported to AUO through channels other than e-mail.
16. Of the 10 cases reported to AUO by ETH, only one related to an allegation of SH. Four cases related to potential violations of the Code of Conduct by IFAD staff or consultants or IFAD national staff contracted through the United Nations Development Programme. Five cases were external complaints that related to potential fraud and/or corruption or contractual disputes in IFAD-funded projects.

D. Cases closed in 2020 - Overview

Figure 4
Cases closed in 2020 – case disposition



17. In 2020, AUO completed its work on 76 cases. Of these, 31 related to complaints received prior to 2020, of which 14 underwent full investigation (one by another agency) and 45 cases received in 2020, of which five underwent full investigation.

AUO also issued three investigation reports relating to a complex case involving both IFAD staff and external entities. This case was still open at the end of 2020, as there remained some outstanding issues to address.

18. Twenty-six cases were closed soon after intake (after AUO ascertained that the complaint was not within its investigative mandate); 32 were closed after a preliminary assessment (after ascertaining that the allegations were not material, verifiable or credible); and 18 were closed after an investigation. Of the 18 cases investigated by AUO, 11 were closed with the relevant allegations not substantiated; however, two of these are being considered for further action by IFAD Management. Seven cases were substantiated or partially substantiated, and the cases were conveyed to the Sanctions Committee for deliberation.

E. Investigations closed in 2020

Investigation cases referred to the Sanctions Committee

19. A description of all these cases is provided below.

External: Violations of IFAD's anticorruption policy

- **Two cases of fraudulent practices by external entities.** Four implementing NGOs were found to have misrepresented information in their bids for a procurement process carried out by an IFAD-funded project. The sanctions deliberations were ongoing at year-end.

Internal: Violations of IFAD's SH/SEA policy, Code of Conduct and/or IFAD's anticorruption policy

- **SH and other misconduct by a staff member.** Further to the referral of two cases to AUO by ETH, the AUO investigation found that a staff member had engaged in SH and other misconduct, including harassment, breach of confidentiality and potential interference in an ongoing investigation. The staff member was summarily dismissed.
- **Misconduct by a staff member.** A staff member was found to have had undeclared and unauthorized overlapping employment with IFAD and another employer and had failed to declare his involvement in outside activities. The contract of the staff member was terminated.

Internal/external: Violations of IFAD's Code of Conduct and and/or IFAD's anticorruption policy

- Three investigation reports issued by AUO for an ongoing case were submitted to the Sanctions Committee for deliberation (the case was still ongoing at year-end):
 - (i) **Misconduct and violations of IFAD's anticorruption policy by a staff member.** A staff member failed to declare his/her involvement in a company that was contracted by IFAD-funded projects and to have engaged in fraudulent and collusive practices. The concerned staff member was summarily dismissed.
 - (ii) **Misconduct and violations of IFAD's anticorruption policy by a staff member.** A staff member was found to have engaged in violations of the Staff Rules and Code of Conduct by failing to declare or seek prior authorization for several commercial activities, and by failing to avoid and/or declare instances of conflict of interest. The concerned staff member was summarily dismissed.
 - (iii) **Fraud and collusion by a company and two of its representatives.** AUO found that a company and its representatives colluded to submit falsified experience certificates and registration documents with its bid for contracts with IFAD-funded projects. AUO also found that the same

persons created and submitted bids from fictitious entities. This case also unearthed strong indications of collusion with project staff (not subject to IFAD sanctions). The issue was referred to Management for applicable operational actions and to the Sanctions Committee. The sanctions deliberations were ongoing at year-end.

- **Misconduct by IFAD staff and IFAD consultant.** The investigation found that an IFAD staff member had misrepresented information to IFAD Management, while no misconduct was found on the part of the consultant. The report was submitted to the Sanctions Committee for deliberation and was referred to Management for further action. A corrective measure was applied to the staff member.

Box 1

Sanctions imposed in 2020/21 relating to cases concluded prior to 2020

- Two companies found to have engaged in collusive practices for coordinating their bids for a procurement action were debarred for three years in 2019. A third implicated company was debarred in 2020 once the notification process had been completed.
- A corruption case involving 12 entities (10 companies and two individuals) resulted in the debarment of all entities for seven years (the sanctions notification process was completed in 2021).
- A case involving fraudulent medical insurance claims by a former IFAD consultant and current dependent of a staff member resulted in a 10-year debarment and exclusion from IFAD medical insurance.
- An IFAD consultant who was found to have engaged in SH was permanently debarred.
- Three individuals and three firms were debarred for five years for fraudulent practice (the sanctions notification process for two of these entities was completed in 2021).

F. Cases closed by AUO after an investigation

20. Eleven cases were closed at the investigation stage as unsubstantiated. Of these, two were internal and nine external.

External cases

21. Notwithstanding the small amounts involved in several allegations, AUO pursued an investigation (generally through remote actions) considering that the alleged actions, if true, raised significant integrity issues for key project management personnel and commonly used vendors, and significant misuse risks in relation to the full amount of IFAD financing and procurement actions entrusted to the same individuals. Even if such allegations were not substantiated, indications from the investigation were useful in IFAD taking risk mitigation actions such as strengthening fiduciary supervision, requesting strengthened project controls or objecting to specific procurement actions.

- **Allegations of fraudulent, collusive and corrupt practices in the procurement of goods.** Staff of an IFAD-funded project, procurement committee members and bidders were alleged to have all engaged in fraudulent, collusive and corrupt practices by preparing documentation that misrepresented a competition in the procurement process in order to improperly influence the process. The specific contract cited in the allegation was worth approximately US\$1,500. However, if true, the allegations would have had significant corruption risk implications for the rest of the project financing. The evidence obtained was not sufficient to substantiate or corroborate the allegations that any fraudulent, collusive or corrupt practices had been committed by the implicated persons/entities.
- **Allegations of fraudulent, collusive and corrupt practices in the procurement of goods.** Project staff and bidders were alleged to have engaged in fraudulent, collusive and corrupt practice by falsifying bid documentation (for a contract value of approximately US\$3,000) in order to give the impression that all the bidders were in genuine competition with each other. Although AUO found some irregularities in the procurement

documentation, the evidence obtained was not sufficient to substantiate the allegations but the case was referred to Management for risk mitigation in relation to other procurement processes involving the same participants.

- **Allegations of corrupt and collusive practices by persons/entities involved in procurement.** A former project staff member was alleged to have taken kickbacks from an entity competing for a contract in exchange for the award of the contracts (totalling approximately US\$200,000). The matter was closed as unsubstantiated as no evidence was obtained by AUO to corroborate that any bribe was made; or that there was any attempt to or success at improperly influencing the award of the procurement contract in question.
- **Allegations of prohibited practices by persons/entities involved in procurement and misuse of project assets.** It was alleged that project staff had engaged in collusive practices with three companies for local purchases, coercive practices (by threatening members of the bid evaluation committees with the termination of their engagement should they refuse to sign false bid evaluation reports) and fraudulent and collusive practices in procurement processes for the supply of computers and IT equipment. Following a full investigation, including a field mission, the case was closed as unsubstantiated.
- **Allegations of fraudulent practice in the use of project funds.** It was alleged that the interest accrued on revolving funds launched through IFAD project financing were systematically siphoned off by project and counterpart staff. AUO closed this matter as no specific corroborating evidence was provided or gathered to support the allegations and no further investigative steps could have been taken as the only implicated subjects were government officials no longer linked to IFAD. Further, the alleged misuse related to interest on deposits from various sources not directly identifiable as IFAD financing. The information gathered was shared with Management for increased supervisory vigilance in relation to the revolving funds.
- **Allegations of fraud and corruption by project staff and government officials.** This case involved the alleged fabrication of documents, such as purchase orders and delivery receipts; the diversion of sale proceeds of commodities intended for distribution to beneficiaries; and misuse of community organizations funding. Following a full investigation, including a field mission, case was closed as unsubstantiated.
- **Allegations of collusion and conflict of interest in procurement.** It was alleged that the evaluation of bids for a contract valued slightly more than US\$1 million was manipulated to favour a bidder with previous links to a bid evaluation committee member. Following a full investigation, including a field mission, the case was closed as unsubstantiated.
- **Allegations of corrupt and coercive practices involving project staff and contractors.** It was alleged that project staff solicited bribes from several entities in exchange for processing their respective invoices for contracts with a total value of approximately US\$600,000. AUO did not find sufficient evidence to support the allegations. However, the information gathered lends some credibility to some of the allegations and operational measures are being taken to mitigate any possible risks, including the possibility of referring the matter to the national authorities.
- **Allegation of corrupt practices involving project staff and consultants.** Specifically, it was alleged that project staff engaged in corrupt practices by requesting a kickback equivalent to one month of salary per year from consultants in exchange for being selected or hired. Although AUO considered

the allegation to be credible, the documentary and testimonial evidence gathered was not sufficient to substantiate the allegations. Based on this and the implication of project personnel in the alleged prohibited practices, operational measures are being taken to mitigate possible risks, including the possibility of referring the matter to the national authorities.

Internal cases

- **Misconduct by a staff member.** A staff member allegedly violated the Code of Conduct by manipulating a selection process for a vacancy to favour one of the applicants. Although the matter was not substantiated, it was noted that negative perceptions were created by the subject's actions and AUO informed Management of the findings to consider corrective or mitigation measures.
- **Misconduct by a staff member.** A staff member allegedly made false and misleading statements in the course of a selection process. The matter was not substantiated but AUO informed Management of the findings to consider corrective or mitigation measures.

G. Cases closed after a preliminary assessment

22. Of the 32 cases closed after preliminary assessment, 27 were external (of which 10 were high priority), four internal (of which three were high priority) and one was mixed internal and external. Closure at this stage means that AUO's review did not generate sufficient evidence to conclude that the allegations were credible, verifiable and material. Many of the complaints included several allegations often involving several potential subjects. A summary of the cases closed after a preliminary assessment is provided below and some cases had allegations covering elements related to both procurement and non-procurement.

External cases

- **Project procurement or selection of service providers.** Of the 27 external complaints closed by AUO after a preliminary assessment, 15 included allegations of prohibited practices in relation to project procurement and selection of service providers. The subjects of the allegations included project staff, project contractors (including NGOs as service providers) or potential contractors, members of project/counterpart bid evaluation committees and in some cases beneficiary organizations. The alleged irregularities included fraud, collusion in manipulating the tender or selection process, offering or receiving bribes and generic corruption allegations. Most allegations were generic or vague but a few cited specific procurement actions (ongoing or recently completed) with values ranging from a few hundred United States dollars to slightly more than US\$1 million. As noted above, the evidence gathered by AUO in assessing these allegations was not sufficient to conclude that the allegations were credible, verifiable (by AUO) and material, and these cases were therefore not pursued as full investigations. Nonetheless, for those cases where AUO had some credible indications of prohibited or other inappropriate practices (such as non-compliant or untransparent procurement practices), alternative risk mitigation actions were either ongoing, had been taken or were being considered. Such actions included parallel national investigations into the same allegations, cancellation of a procurement process, strengthened IFAD supervision and targeted capacity-building or referral to national authorities for further investigation.
- **Alleged prohibited practices not directly related to procurement.** Twenty-one complaints included allegations of improper practices in relation to project activities other than project procurement or the selection of service providers. The alleged irregularities included fraud (such as false or inflated expense reimbursements, submission of false implementation reports, salary double dipping or submission of false credentials in applying for key project positions), diversion of project funds for personal gain (including attempted

embezzlement, theft and misappropriation), collusion (e.g. in covering up overpayments, undeclared conflicts of interest and parallel commercial interests), coercion (withholding due payments), misuse of project assets for personal benefit and generic fraud or corruption allegations involving unidentified subjects or actions. The subjects of the allegations included project staff, counterpart staff, project contractors and implementation partners or subcontractors and in some cases beneficiary organizations. Most allegations were generic or vague but a few cited specific actions. Although these cases were closed by AUO, alternative risk mitigation actions have been taken or are being considered for those cases where AUO/IFAD had credible indications of inappropriate practices. Such actions included parallel national investigations into the same allegations, termination of subcontractor arrangements, refund of potentially misused funds and declaration of ineligible expenditures, strengthened project controls, IFAD declaring its objection to certain actions, strengthened IFAD supervision and targeted capacity-building or referral to national authorities for further investigation.

Internal and mixed cases

- **Alleged violations of the Code of Conduct.** The five complaints against staff members closed by AUO after a preliminary assessment included allegations of improper interference in a project recruitment process, making false and/or defamatory statements against colleagues, instigating external parties to file complaints to IFAD against project staff, failing to adhere to COVID-19-related quarantine obligations, potentially endangering the health of others, and violating national laws and communicating inappropriately with a Member State. AUO found that these allegations lacked credibility and in some cases referred the matter to Management to consider corrective measures and/or other operational actions.

H. Cases closed at the intake phase

23. Twenty-six issues reported to AUO were closed at the intake stage, mainly after ascertaining that the allegations did not fall within AUO's mandate. Most of the matters were transferred to Management for follow-up action, including eight complaints relating to project recruitment. One case of fraud by an entity with no contractual relationship with IFAD was referred to Management to issue a cease and desist order. Two internal conflict matters were referred to ETH for preliminary review, as per procedure.

V. Outreach and cooperation

24. AUO revised its workplan as a result of the COVID-19 global pandemic, limiting its anticorruption awareness activities to those intended to mitigate any increased risk of fraud or corruption due to the impact of the pandemic. In this context, AUO actively participated in and contributed to various professional events held by IFAD (e.g. PMD and FMD), United Nations agencies, international financial institutions and Member States audit, investigation and compliance networks. The annual audit and investigation network meetings were held in a more limited online format in 2020. The network of United Nations and international financial institution internal oversight functions remained active with monthly and quarterly online encounters and presentations on relevant topics, with periodic surveys for comparative benchmarking within the community.
25. AUO continued anticorruption outreach activities through its e-learning training, online and other awareness-raising materials and presentations. At the end of 2020, AUO systematically followed up with IFAD staff who had not yet completed the e-learning training. Other outreach activities included regional training, a corporate induction workshop and tailored training for various new FMD regional officers. AUO continued to maintain and update its anticorruption web pages on the IFAD website and intranet.

VI. AUO capacity, staff and resources

26. **Staffing.** AUO's staff capacity was reinforced in 2018/19 with the addition of three new professional positions. By the end of 2019, all three had been encumbered; however, in 2020 two AUO investigation officers resigned to pursue promotion opportunities at other United Nations agencies. One of the resulting vacancies was filled in September and the other in early 2021. Overall AUO staffing in 2020 comprised nine professional and director positions and 2.5 General Service positions, as shown in table 3 below.

Table 3
AUO staffing in 2020

2020 (approved positions)

Director	
Administrative assistant (0.5 full-time equivalent [FTE])	
<u>Internal Audit</u>	<u>Investigations</u>
Audit Manager	Investigations Manager
Senior Audit Officer	Senior Investigation Officer
Audit Officers (2)	Investigation Officers (2)
Audit Associate	Investigation Assistant

27. AUO filled the investigation staffing capacity gap through the use of full-time consultant resources and two staff secondments.
28. **Financial resources.** AUO's total budget allocation for 2020 was US\$2.40 million, comprising standard staff costs (slightly adjusted for brief periods of vacant staff posts without staff/consultant incumbents) and US\$450,000 in non-staff resources (to cover the costs of full-time consultants, other required experts, including local experts, specialist audit and investigation services from firms, travel, audit and investigation tool licences, and specialist training). Utilization of the AUO budget stood at 98.5 per cent over the year – the additional local resources and external expertise required to ensure work continuity notwithstanding the COVID-19 restrictions were primarily funded through a reallocation of the travel budget.