

# 3.1 Operating Environment

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In order to mitigate threats and risks to AJACS delivery, we have drawn up an extensive risk management plan, the details of which are outlined below. ASI has learnt a number of important lessons about risks and risk management related to management of projects in Syria from the implementation of AJACS, the Stabilisation Response Mechanism, Tamkeen and Governance Through Education. Likewise, our experience of operating remotely from Turkey and Jordan has reinforced our systems for working in such a challenging environment. Below we list the risks and challenges we are likely to encounter and how our procedures will mitigate them.

## Oversight and management of threats and risks

The programme team will monitor and manage risks using a matrix that will be regularly updated as new risks emerge or the probability and/or impact change. Our risk management should be systematic and responsive. We are deliberate about reporting all incidents within 48 hours and making the connection to the risk management system. The matrix specifies the risk, type, probability, impact, the composite risk index, the response and the owner. It determines whether to treat, tolerate, terminate, transfer or escalate the risk faced.

- › Treat – to mitigate a risk to reduce either its probability of occurring or its impact, or both.
- › Tolerate – to accept a risk as is because we don't have the means or levers to treat it or because it is not cost-effective to do so.
- › Terminate – where a risk is too high it may be appropriate to stop the activity to terminate the risk. This should only happen if it is not possible to transfer that risk to a party that does have the means to treat it.
- › Transfer – allocating a risk to another organisation or management level for them to own and manage because we don't have the levers, means or resources to treat it but another party does.
- › Escalate – this is not transferring a risk but rather having to seek a decision from another management level to get approval to treat, tolerate or terminate a risk.

Underlying our risk management system is our existing capacity in research, M&E, financial oversight, governance of equipment, and field security, both in Syria and outside. Our field networks and understanding enable us to extract information reliably and promptly from the field. Our leadership structure and management systems then allow us to respond appropriately and report on it. These capabilities are described in other sections of the proposal.

We divide the risks and threats facing the programme into contextual risks, programmatic risks, legal/reputational risks, and security risks, a sample of which are below. The risk matrix displays a full list of the most significant risks to AJACS.

## Contextual risks

**AJACS has reduced operating space due to EIG interference.** The objective of supporting policing and justice actors to provide community security in opposition Syria forms part of a broad, multinational effort to support the moderate civilian and armed opposition. AJACS is known to attract the attention of extremist groups such as Jabhat al-Nusra and ISIS affiliates Jund al-Aqsa, who may inhibit our work, challenge our agenda, and threaten our staff and partners via kidnap, assault and theft of equipment. Our response is to *treat* the risk. Where feasible, we will present a challenge to EIGs for control of a community. We will not give ground unless forced to by donor red lines. We will also *treat* through research and monitoring in Syria as well as through equipment risk registers and contingency plans. Keeping abreast of armed actor trends and movements is a key function of our in-country Syrian field staff and our already existing extensive networks. The secretariat must *tolerate* the potential for equipment losses to a reasonable degree. If red lines are crossed or risk limits reached the risk must be *terminated*. *Probability/Impact: High/Medium.*

**The operating space for the moderate opposition shrinks due to regime or IS advances.** Areas of opposition control have shrunk dramatically in 2016 due to parallel campaigns by the regime and Syrian Democratic Forces (SDF) in the northern Aleppo countryside and regime offensives in Dera'a and Latakia. The cessation of hostilities has, by July 2016, largely broken down in northern Syria despite holding in the south. Advances by ISIS affiliates in southeast Dera'a have nonetheless caused spikes in fighting. Further significant regime or ISIS advances would reduce the space for operation of AJACS supported structures.

Our response will be to *treat* this risk. We will look for opportunities to expand elsewhere in the north or south of Syria to maintain opposition strength and credibility. We will react through research, monitoring as well as contingency plans. The programme and donor must *tolerate* the loss of equipment to a reasonable degree. If red lines are crossed or risk limits reached the risk must be *terminated*. *Probability/Impact: High/Medium.*

## Programmatic risks

**Closed borders and disrupted access routes limit movement within and out of Syria.** Changes in the security environment in Syria, particularly near the border, and the political environment in Turkey will limit the ability of AJACS to deliver material assistance to its partner institutions. Partners and field staff will be less able to travel to/from and across the border. This would cause a delay to implementation. Our *response* will be to *tolerate* the risk by researching and monitoring the security situation; by communicating with trainees whilst in Syria; and by maintaining contact with the Turkish and Jordanian government to know when the border might be open again. We will be prepared to use alternate routes and whatever can be achieved remotely through, for example, the *hawala* system. *Probability/Impact: High/Medium.*

**Sub-contractors hired to deliver training and equipment fail in their duties.** Either ASI's partner, Creative Associates, or one of the firms hired to procure equipment and carry out research may, for reasons ranging from mismanagement to inadequate quality assurance, fail to deliver. In such circumstances our *response* would be to *treat* the risk. ASI's and Creative's governance and management systems are, on AJACS, intertwined and after almost two years of joint implementation we have a solid working relationship. The team leader and deputy team leader work in collaboration to ensure that the programme delivers on its outputs. ASI assumes responsibility for its sub-contractors and incorporates contingency for the non-delivery of good and services into its contracts. Our project management systems are structured to guarantee quality, with a team leader guiding and delivering all aspects of the programme, two project managers in Turkey overseeing day-to-day functions, and a project director responsible for strategic oversight and quality assurance. We maintain regular contact with our prime sub-contractor, Creative Associates, throughout the programme. We will also maintain a network of service providers to step in should a sub-contractor fail. *Probability/Impact: Low/Low.*

**Key or non-key staff become temporarily or permanently unavailable.** Staff may become temporarily unavailable for security or personal reasons or may leave the project. Our *response* will be to *treat* the risk. We aim to recruit high quality personnel commensurate to the project's needs. Via good project management, a supportive working environment, and advantageous terms and conditions, we are able to keep our team in place. All critical roles are backstopped by other staff members, e.g. the team leader is backstopped by the deputy team leader. We will also maintain a roster of consultants that are available to deploy at short notice and will make sure our sub-contractors do the same. *Probability/Impact: Low/Low.*

**Material support, notably equipment, and money are lost to armed actors.** AJACS delivers large volumes of non-lethal equipment and stipends to the FSP, civil registries and CSWGs. Armed actors have on occasion appropriated police equipment and skimmed funds from stipend payments. This practice is likely to reoccur. Our *response* will be to *treat* the risk. AJACS supported entities understand and practise the need to protect donor provided equipment and money from loss. A robust research capability spots danger signs. Comprehensive contingency plans are maintained. Accounting and verification procedures are in place throughout the programme, including M&E. Stipends are verified and operating costs are accounted for with receipts. If appropriate, the secretariat may engage where interference occurs. Losses and interference will be *escalated* to the secretariat. *Probability/Impact: Medium/Low.*

## Legal and reputational risks

**The FSP or judiciary collaborates with extremist actors or commits human rights abuses.** Associations between policing and justice providers and extremist associations, or acts by providers that contravene human rights law and standards, risk the legal and reputational viability of the programme. Our *response* would be to *treat* this risk by regularly communicating and reinforcing red lines, and by training the FSP in human rights and appropriate methods for arrest. AJACS provides only non-lethal support to FSP and also seeks to strengthen moderate justice institutions where possible. We will also *treat* the risk with research and monitoring in Syria. Reports of violations of human rights by the FSP or other AJACS supported actors will be *escalated* to the secretariat. *Probability/Impact: Medium/High.*

**AJACS supported institutions lose legitimacy through association with Western support.** The backing of moderate opposition actors in the governance, security and military space is well known. Several armed groups and governing bodies have been forcibly closed and many more intimidated. This also risks the safety of staff and trainees. Our *response* will be to *treat* this risk. AJACS is designed to engender accountability of S&J providers to the communities they serve, not to AJACS. Branding provides a degree of separation from donors and implementers. Communications and media training for the FSP and CSWGs improve messaging. Reports of direct challenges or media attention within Syria on role of donors and implementers will be *escalated* to the secretariat. *Probability/Impact: Low/Medium.*

## Security risks

**Field staff in Syria are put in danger by the security environment.** The physical threat to field staff in Syria is substantial and can come from a variety of sources: kinetic threats, arrests, or other forms of interference. Loss of or injury to field staff will inhibit the programme's ability to research, implement and monitor. Our *response* will be to *treat* this risk by training all staff to minimise their profile, putting personal protection plans in place, and monitoring the security situation. Significant changes in security risk will be *escalated* to the secretariat. *Probability/Impact: Medium/Medium.*

Risk	Risk Type	Probability (1 – low, to 3 – high)	Impact (1 - low 3 high)	Composite Risk Index	Response	Risk Owner
Logistics and support restrictions – border closures or supply lines being cut/siege.	Programme	3	2	6	TOLERATE – be prepared to use alternate routes and whatever can be achieved remotely through, for example, the Hawala system. Where AJACS forecasts a shortfall in programme outcomes/outputs it must be escalated to the Secretariat.	AJACS DTL
Funding shortfalls – a change in donors’ planned contributions to the programme, reduced volume or delay.	Programme and Reputation	3	2	6	TRANSFER – the Secretariat must own this risk. The funding flow this Financial Year is critical, and both the volume and the timing of donor contributions is uncertain. Even with the adoption of a work plan separated into core and additional commitments there is a large amount of residual risk to our outputs, and to donor and AJACS reputations.	Secretariat
Inability to demonstrate the FSP as a robust and accountable policing service because of an inability to engage with the justice sector.	Programme and Reputation	3	2	6	TOLERATE – donor red lines (certainly in the North) preclude the FSP engaging with the majority of justice sector actors. Risk can be treated to some extent through training the FSP in preparation for delivery of a full policing service but without practical application of the taught skills and joining up the justice, corrections and policing sectors we will not demonstrate a full capability.	AJACS TL
Reduced programme operating space – caused by EIG control within Opposition held communities.	Programme and Legal	3	2	6	TREAT – where feasible, present a challenge to EIGs for control of a community. Do not give ground unless forced to by donor red lines. Donors must TOLERATE the potential for equipment losses to a reasonable degree. If legal limitations are reached risk must be TERMINATED. Changes in AJACS footprint (recommended or undertaken by our partners) must be escalated to the Secretariat.	AJACS TL
Reduced programme operating space – caused by advances by ISIS, Regime or SDF.	Programme	2	2	6	TREAT – look for opportunities to expand elsewhere in the north or south of Syria. Donors must TOLERATE the potential for equipment losses to a reasonable degree. Changes in the AJACS footprint (recommended or undertaken by our partners) must be escalated to the Secretariat.	AJACS TL
Programme damage – entanglement with judicial and/or corrections entities that contravene donor policies.	Programme, Legal and Reputation	2	3	6	TREAT – constant monitoring of relationships between the FSP and judicial/corrections entities for signs of undesirable cooperation. Regular reinforcement with FSP of the impact of crossing donor red lines. Escalation to the Secretariat where danger signs are uncovered or transgressions reported.	AJACS TL

Risk	Risk Type	Probability (1 – low, to 3 – high)	Impact (1 - low 3 high)	Composite Risk Index	Response	Risk Owner
Physical danger to Field Officers – kinetic threats, arrest or other interference.	Security	2	2	4	TREAT – training all staff to minimise profile, suspension of tasks when tension is high. Personal Protection Plans in place and situation monitored by Components, Operations and Research. Changes in AJACS footprint (recommended or undertaken by partners), or significant incidents involving AJACS Staff must be escalated to the Secretariat.	AJACS TL/ ASI/Creative Associates
Loss of material or money to armed actors.	Programme and Reputation	2	1	2	TREAT – AJACS supported entities understand and practise the need to protect donor provided equipment and money from loss. Robust research capability in AJACS to spot danger signs, and comprehensive contingency plans. Accounting and verification procedures in place through Components and M&E. Stipends verified, operating costs accounted for with receipts. Engagement by donors with factions where interference occurs. Losses/interference escalated to the Secretariat.	AJACS TL
Programme damage – AJACS supported institutions contribute to or commit human rights abuse.	Programme, Legal and Reputation	1	3	3	TREAT – clear red lines communicated and reinforced regularly with counterparts. AJACS provides only non-lethal support to FSP. FSP trained in human rights, and appropriate methods for arrest and detention. AJACS seeks to strengthen moderate justice institutions where possible. Reports of violations of human rights by FSP or other AJACS supported actors escalated to the Secretariat.	AJACS TL
Inability to operate effectively from Gaziantep – security or complete closure of border into Aleppo.	Programme	1	2	2	TOLERATE – where AJACS security measures are no longer effective, instigate business continuity plans to enable temporary operation with reduced profile, or a change of AJACS HQ location if necessary. A change of AJACS HQ location may also be beneficial in the event of the border into Aleppo closing. Where AJACS forecasts a shortfall in programme outcomes/outputs this must be escalated to the Secretariat.	AJACS TL/ ASI/ Creative Associates
Programme growth – negotiations or a peace deal yield results and AJACS is directed to expand.	Programme	1	2	2	TOLERATE – the combined effect of the low probability of occurrence and the challenge of forecasting what the resulting situation on the ground would or could look like makes this risk impractical to treat.	AJACS TL
Programme damage – AJACS supported institutions lose legitimacy through association with Western support.	Programme and Reputation	1	2	2	TREAT – programme designed to engender accountability of S&J providers to the communities they serve not to AJACS. Branding provides a degree of separation from donors and implementers. Comms and media training for FSP and CE FOs to assist FSP and CSWG messaging. Reports of direct challenges or media attention within Syria on role of donors and implementers escalated to the Secretariat.	AJACS TL