

1.2.2 Risk Management

Siren considers risks according to a number of categories, including: operational, security/safety, financial, and political/reputational, as well as gender specific and conflict specific risks. Initial risks are identified, assessed, and then addressed during the programme design phase. A risk register is maintained, establishing overall risk Score (S) via a Probability (P)/Impact (I) matrix. Risks are assigned owners, who are responsible for monitoring and managing throughout implementation of the programme. Risk registers are reviewed weekly by the Programme Manager; issues and risks beyond their tolerance are elevated to the Programme Board for mitigation and management. Relevant risks are also reported to British Embassy Beirut (BEB) in accordance with their reporting requirements, and Siren maintains open communication channels with BEB in order to manage major risks. Key threats and risks rated high or very high, are described below, including their possible impact on programme results and Siren’s initial response plan for managing these risks. These risks have been identified **based on Siren’s understanding of the local context, drawing on over ten years implementing policing reform programmes in Lebanon and the conduct of regular risk assessments throughout.**

Siren takes the risk of subcontractor failure seriously and has put in place clear mitigation strategies to reduce its probability below the threshold of high/very high. Strategies include: Consortium partners co-design the technical and commercial bid collaboratively and transparently and have established a strong organisational working relationship and complementarity; Siren and Integrity have conducted a mutual due diligence process to provide confidence, compliance and visibility throughout the supply chain; and Siren and Integrity are bound under a Teaming Agreement and a Service Agreement upon Contract Award providing clarity on programme governance, deliverables, accountability, quality and performance management.

Risk	P	I	S	Response Plan
SECURITY & SAFETY RISK				
If a security incident, terrorist attack, kidnapping, or sectarian violence occurs in Tripoli, this could cause personal harm to staff, damage programme and Embassy reputation, and significantly delay or alter programme outputs due to reduced access to sites.	3	5	HIGH 15	Siren has operated in Lebanon since 2008 without major incident. Siren has detailed clear Duty of Care practices in Section 1.2.1, including daily monitoring of security risk drawing on open sources, established ISF and government contacts, and field data collected during implementation. Security risk mitigation practices are the responsibility of a dedicated Programme Security Manager. All personnel deployed on the programme will partake in Siren’s four day residential training, including Hostile Environment and Awareness Training.
FINANCIAL RISK				
Funds distributed to sub-contractors are at risk of being diverted, including for fraud or to terrorist organisations.	2	5	HIGH 10	Siren operates according to its best practice procurement manual; robust due diligence procedures are outlined in section 1.2.6. Siren has over a decade of successfully sub-contracting work in the MENA and in ensuring delivery of major infrastructure projects without violation of UK legislation or any investigation of procurement malpractice.
POLITICAL / REPUTATIONAL RISK				
There are significant reputational risks where direct ISF beneficiaries are involved in breaches of human rights. There are additional reputational risks in the case of any major human rights incident or corruption scandal involving the ISF, even if occurring outside the scope of the programme. Detention conditions currently pose the highest risk of such a critical incident.	3	5	HIGH 15	Siren has previously been able to secure guarantees (that have been honoured) from the ISF that facilities developed with HMG support remain fully compliant with human rights standards. Siren has established clear escalation procedures as part of its client liaison arrangements (<i>section 1.2.6</i>). Human rights issues are escalated immediately to Siren’s Programme Director. If the issue has ongoing and immediate implications for the safety or protection of either a beneficiary or personnel member, the Programme Director will notify BEB. If the issue does not have immediate harm implications, The Programme Director will conduct an investigation, reporting to the Head of CSSF Lebanon regarding the outcome of the investigation. A joint BEB/Programme Team action plan will then be agreed. Siren, given existing networks within the ISF, is uniquely placed to access reliable and timely information in relation to potential human rights abuses, security incidents, or corruption.
OPERATIONAL RISK				
If the program is not sufficiently coordinated with other key donors and implementers, this will significantly impact on programme outcomes and sustainability.	4	3	HIGH 12	Siren has proposed a number of programme deliverables that address this deficit at both a strategic and operational level, including support to the MoIM in establishing a donor coordination forum and the establishment of an ISF Steering Group for the Roll Out of Community Policing. Siren is actively coordinating with other ISF-related implementers (e.g. the US Automation Programme suppliers) to maximise synergies. Siren will work closely with the British Embassy Beirut Police Attaché in her role in facilitating international policing cooperation.

Risk	P	I	S	Response Plan
Due to government austerity measures, the ability for the ISF to participate in study visits is highly constrained and an internal moratorium on visits abroad has been issued. Experience has shown that ISF study visits pose significant risk to programme credibility, often used as a means to 'reward' certain officers for actions unrelated to the programme, with potential to contribute to corruption. The ISF Head of SPT has explicitly requested no formal twinning arrangements.	5	2	HIGH 10	Siren has adopted a pragmatic position towards the use of study visits. Rather than an overreliance on such visits and formalised twinning, Siren will employ a flexible, adaptive approach to partnerships between the ISF and other police institutions, utilising a combination of remote video link, exchange of documents, and in-country visits by subject matter experts to Lebanon. This builds on previous success under BPSP 1, and demonstrates value for money through the utilisation of the high-end technological capabilities now available in key programme areas. Should the conditions for study visits become more favourable, Siren has the proven capability to conduct them on short notice, and would reserve them for strategic (rather than tactical) inputs involving senior ISF members involved in managing major organisational change management processes (i.e. strategic planning and/or ISF/LAF transition). Such visits are likely to be more viable given the current austerity measures and are less prone to political interference due to the low number of spots available and the seniority of those who would be included.
Poor human resource management within the ISF poses a continued risk to delivery of programme outcomes, most notably the roll-out of community policing. As a result, continued investment in community policing infrastructure will not, on its own, improve policing. This risk is made more acute due to austerity measures adopted by the government.	5	4	VERY HIGH 20	Siren prioritises the need to address the root causes of this issue. Siren will conduct a human resource restructuring within Beirut that realigns current resources against security and community safety demands. This will be accompanied by a nationwide study that maps current resources against demand and makes recommendations to the ISF and the Lebanese Government on how resources could be restructured across the organisation. Siren will ensure that further roll-out activity to Tripoli will focus on interventions that can enable more efficient and effective approaches to community policing; the roll-out to Tripoli will centre on the establishment of a Command and Control Centre and two stations that share facilities in order to merge functions and optimise human resources.
The ISF may not have the capacity to properly maintain equipment, software, and building refurbishment to a necessary standard to ensure value-for-money and sustainable investment.	4	4	HIGH 16	Siren has previously ensured maintenance beyond programme lifetime by working with the ISF to ensure that they have agreed maintenance contracts with relevant suppliers for equipment; Siren will maintain this approach. The programme includes direct support to the ISF buildings and telecommunications departments to develop in-house capabilities to troubleshoot and maintain systems, building greater sustainability into the ISF to maintain and roll-out models. Siren prioritises the design of low maintenance, locally sourced features to decrease maintenance cost. ISF responsibility for continued maintenance will be included in any MOU.
GENDER-RELATED RISK				
The low number of women personnel in the ISF will create difficulties in ensuring their availability in key positions for community policing and human rights related components of the programme.	5	3	HIGH 15	The Human Resource Review, including the gender analysis, seeks to directly address this issue by providing the ISF and the British Embassy Beirut a shared evidence-base for how women currently in the organisation can be more effectively deployed in operational policing roles to enhance trust in the ISF and increase community safety. This is a primary focus of the Women and Policing conference, to be held March 2021 as part of the programme.
CONFLICT-RELATED RISK				
If violent confrontations occur between the ISF and MARCH beneficiaries during joint engagement events, this could significantly undermine community cohesion, peacebuilding, and CVE outcomes.	2	5	HIGH 10	Community engagement programming in Tripoli will be highly adaptive and flexible to take account of ongoing developments in conflict dynamics. Siren will maintain ongoing conflict analysis, informed in part by local NGO partners and field visits/research. Clear security and due diligence protocols are in place to ensure that all beneficiaries (both ISF and vulnerable youth) are protected from harm.
Risk that technologies built within the ISF to detect criminal activity will be repurposed to infringe on civil liberties or for personal/political purposes that undermine the introduction of accountable, community-oriented policing, driving conflict dynamics between the state and communities.	2	5	HIGH 10	Siren adopts a privacy-ethics-security by design approach to building ICT solutions and policing analysis capabilities, including the incorporation of blockchain technologies to ensure tamper-proof digital audit trails. Siren has contracted a subject matter specialist to quality assure delivery from a rights & privacy perspective. A data privacy and security audit will be conducted as part of Siren's digital risk management approach. Siren will concurrently develop the ISF's monitoring mechanisms through a rights-based approach to policing accountability.