

Our experience of working in Lebanon since 2015 on highly relevant programmes, combined with our extensive experience operating in FCAS, means we are extremely confident in our ability to proactively manage risk to ensure we meet our objectives. With four ongoing projects in Lebanon, working with multiple SSAs, and spanning most of the country, we remain confident in our ability to manage the diverse challenges and risks within this programme, ensuring it remains focussed on achieving the outcomes and impact stated in our Theory of Change (see section 1.2.4).

**We operate based on international best practice when it comes to risk management:** Achieved through ISO31000 compliant, layered proactive initiatives including: formal and dynamic risk assessment and mitigation (as illustrated in our risk management process shown below); strong communication with the BEB and stakeholders; appropriately equipping staff; providing appropriate/on-going training/briefings and continually honing, testing and enforcing our comprehensive Company Operating Procedures, which keep management of risk as a central tenet. We have adopted DFID’s approach to identification of risk: **Context** (operating context of implementation of programmes including political developments); **Delivery** (delivery of the consortia and supply chains, to beneficiaries as well as the performance of the programme); **Safeguarding** (aspects that may impact our ‘do no harm’ approach); **Operational** (our capacity and capability to manage the programme); **Fiduciary** (appropriate management of funds throughout our supply chain); **Reputational** (those risks that could threaten the reputation of Torchlight / partners or HMG).



**We will manage and monitor all project risks through the use of a blended project team, of local and international staff, balanced cross confessional and gender, to combine indigenous knowledge with wider experience, along with a trusted network contacts within Lebanese state security agencies (SSAs), and communities. These insights will support our ability to dynamically conduct risk assessments and mitigations to minimise the impact upon project delivery.**

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**Managing security threats to ensure programmatic success.** We fully understand that Lebanon presents a challenging operating environment for donors both in terms of security issues including terrorism, cross-border conflict, crime and political instability, and working with government partners where organisational and sectoral issues may impact both effectiveness and willingness.

We assess that terrorism currently poses more of an incidental than a direct risk, with most attacks targeting personnel and facilities associated with Hezbollah, Shi’a civilian areas and occasionally politicians. This is not to discount the threat posed by radicalised individuals or former ISIS fighters now widely dispersed across the region, who may be part of the community the project might be engaging with. Working alongside the Lebanese ISF will raise our profile, increasing physical and virtual risks. Our team will undergo Hostile Environment Training appropriate to Lebanon, prior to deployment, to ensure they fully understand the varied risks (including personnel and cyber security) and how best to mitigate them.

**Adding value:** *Our in-country experience provides a comprehensive understanding of the security conditions that might impact the project, such as Hezbollah strongholds throughout the country and how they engage with both the ISF and other SSAs in different governorates as well as the increased threats (tensions and UXOs, for example) in border regions such as Arsal.*

Given the multiplicity and complexity of political, and formal and informal security and justice actors in Lebanon this project will be confronted with challenges as a result of shifts in political positions, competing priorities and inter-agency rivalries amongst beneficiaries. Any one of these can lead to organisational inertia, the inability to gain stakeholder access and consequential failure to acquire the mandate to deliver activities including data collection in support of Monitoring, Evaluation and Learning (MEL). Working with the BEB during Inception, we will conduct detailed stakeholder analysis to identifying the key stakeholders, understand their position, willingness, influence and motivations to inform a pragmatic engagement strategy (see section 1.2.7 for our relationship management strategy and KPIs for how we will measure stakeholder buy-in). This will also be supported by iterative and adaptive planning that allow us to modify or sequence our delivery schedule to ensure that any ‘issues’ do not result in delays to delivery.

**We recognise that there are human rights (HR) concerns regarding the practices employed by the SSAs within Lebanon**, including ISF, and the impact that this can have locally (negative public perception) as well as internationally (reputational damage to UK-Lebanon relations). We will incorporate our use of HMG’s recognised four-stage ‘AIMS’<sup>1</sup> model for Human Rights management as a continuous activity to produce specific impact assessments for all security and justice uplifts that could result in: changes to law, policies, capabilities of the institutions, and directly or indirectly lead to the identification, investigation, arrest/detention, prosecution and loss of liberty of individuals as a consequence of programme delivery interventions.

**Strong monitoring, communication and governance within our delivery structure.** In addition to our in-country resources, Torchlight conducts its own geopolitical and security monitoring of those areas in which it operates, and we will continue to closely monitor regional tensions and the potential implications for Lebanon, its neighbours and the UK, and therefore the project. This multiple source approach will allow us to proactively track, report and manage threats as they change, ensuring BEB are updated in our monthly and quarterly reports. Any risks that require immediate attention will be addressed by the Programme Manager, in close consultation with the BEB team. All our team will receive regular security briefings, along with any wider programmatic risks so that they are alive to potential sources of friction when working with the beneficiaries. For Project Governance and Risk, the escalation route is from the project team to Doug McKenna, Programme Director and Torchlight’s Security and Justice Director, and then to the Torchlight CEO – the Torchlight Board is the ultimate risk owner of company operations. The attached Risk Matrix captures an example of the key risk factors by broad category, with associated mitigation measures; for example, to reduce risk of RTAs, which is one of the most probable risks to safety of our personnel, we will utilise former ISF as local drivers who are trained and know the local areas.

<sup>1</sup> AIMS model for human rights management is: 1. Assess 2. Identify 3. Mitigate 4. Strengthen

Risk Management Matrix								
Category of Risk	RISK	Inherent Risk		CONTROLS	Residual Assessment		FURTHER ACTION	RISK OWNER
		IMPACT	LIKELIHOOD		IMPACT	LIKELIHOOD		
Delivery	<b>Access</b> - Inability to access locations, in particular along the Syrian border incl. Akkar and Hermet; lack of engagement / commitment / failure to accept project mandate by ISF leads to inability to achieve project objectives and deliverables.	High	Medium	<b>Treat:</b> This is a demand led project. We will leverage our existing strong relationships within Lebanon, especially ISF, to continue to work in close partnership along with the BEB to ensure project communications are fully coordinated and outputs and outcomes achieved. Engagement Strategy agreed.  <b>Treat:</b> Careful selection of locations using our selection framework (1.2.4) and staff with experience and track record in working with key stakeholders and institutions, able to navigate cross confessional, political and cultural landscape. Includes former ISF and other SSA personnel with right levels of access and influence.	Medium	Low	<b>Treat:</b> Use of established network of contacts and local knowledge to support Authority in engagement with regards to mandate.  Maintain buy in from ISF through partner approach to developing solutions.  Remain flexible and responsive to partner requirements and challenges – continuous situational monitoring and consultation.	Torchlight
Delivery	<b>Approach and mandate.</b> ISF are not willing to shift in practice to a community policing approach, or do not perceive it to be useful or within mandate	High	Medium	<b>Treat:</b> We will focus on early benefits with our pilot CSP initiatives in 4 locations, scaling to cover all Governorates over the 3 years. Aim to deliver quick wins to the ISF and the communities to demonstrate the linkages between community policing and security/CT.  <b>Treat:</b> We have put in place a stakeholder mapping and networking analysis tool that will support our engagement strategy and flag any potential blockers early on (see 1.2.7).	Medium	Medium	<b>Treat:</b> Our approach is built on co-creation and participation meaning we will capture any unwillingness early on and will adapt our delivery approach immediately to never linger on delivery activity which is not working.  <b>Treat:</b> Continuously update our stakeholder map, analysis and engagement plans.	Torchlight
Delivery	<b>Coordination.</b> Politics of inter-agency relationships inhibits joint working and coordination	High	Medium	<b>Treat:</b> Our team has extensive experience of navigating and driving coordination between SSAs which will serve as the starting point for contingency planning and a formal incentive plan for coordination.	Medium	Medium	<b>Treat:</b> Work in close collaboration with our ex-SSA advisors to identify alternative routes of engagement or incentives for coordination.	Torchlight
Delivery	<b>Beneficiary rejection.</b> Communities perceive community engagement as intrusion or intelligence gathering	High	Medium	<b>Treat:</b> Based on a conflict sensitive approach, we will work in close collaboration with community leaders and CSOs to create open communication between communities and ISF.  Establish external accountability mechanisms where ISF activities are transparent to communities. More engagement drive positive outcomes such as improved crime reporting.  Community perception surveys conducted periodically which will inform adaptations to methodology and delivery plan.	Medium	Medium	<b>Treat:</b> adapt and deepend activities under Outcome 1, 2 and 4 to focus more on community policing models (all bespoke to specific locations).  Over the life of the programme transition community perception surveys, analysis, and police service adaptation to be owned by the ISF to provide sustainable positive community engagement.	Torchlight
Delivery	<b>Ownership.</b> Lack of buy-in from ISF leadership stakeholders	High	Medium	<b>Treat:</b> Pause delivery in areas where actions may not produce outputs our lead to outcomes – our iterative and adaptive planning will ensure resources are appropriately focused elsewhere to ensure programme momentum is not lost  Analyse the reasons for reduced buy-in and develop appropriate mitigation measures	Medium	Medium	<b>Treat:</b> Realign delivery with individual and organisational incentives. Our full approach is to support ISF-led change, but continual adaptation to ensure alignment with current circumstances and pressures is essential.  If obstacles persist, report clearly and quickly to the Authority, including for discussion of potential BEB intervention if the issue is at policy/political level, in line with our risk management processes.	Torchlight
Delivery	<b>Sustainability</b> - Changes are not enduring beyond the life of the programme. Solutions not fully adopted by beneficiaries resulting in changes that are temporary.	Medium	Low	<b>Treat:</b> Utilise consultative approach to agree problem and drive context specific beneficiary-owned solutions.  Incorporate indicators for sustainability within MEL, using PDIA to review, assess and adjust as needed throughout. Use of local resources to build national capacity and capability to deliver future projects of this type. For full sustainability plan please see section 1.2.5	Low	Low	<b>Treat:</b> Incultate ethos of sustainability with ISF and Mol through delivery means including Train the Trainer, exposure to and embedding of MEL within ISF SIMU and demonstrating benefits of proposed/delivered changes to people, processes and technology. Conduct donor mapping to identify external sources of funding. Develop sustainability plan aligned to HMG exit strategy.	Torchlight
Delivery	<b>Conflict Sensitivity</b> - The project inadvertently creates conflict or exacerbates tensions between communities by highlighting existing differences, reinforcing narratives about marginalisation or favouritism.	Medium	Medium	<b>Treat:</b> Embedding a conflict sensitive approach in programme design, delivery, tools and literature. Ensuring use of carefully instructed and sensitive language. PEA and Conflict Expert Inoud Salamay will continuously advise the core team on conflict sensitive approaches.	Medium	Low	<b>Treat:</b> Continue to conduct PEA and conflict sensitivity reviews of all project activities and outputs. Adapt programme delivery on monthly and quarterly basis in consultation with ISF and BEB.	Torchlight
Operational	<b>Threats</b> - The safety of project staff, partners and third parties affected by our activities is compromised (by incidents such as terrorism, crime, civil unrest, environmental), resulting in disruption/cancellation of delivery activities.	Medium	Medium	<b>Treat:</b> Initial risk assessment completed. Torchlight staff undergo mandatory training (HET, cyber awareness, bribery, HR, safeguarding) prior to deployment. Continual monitoring of threats and situation throughout delivery.  Contingency plans for enhancing personnel security measures. Use of dedicated drivers (with experience of working with/for SSAs) for movements. 24/7 GPs tracking of staff in country. Regular liaison with the BEB, partners and local networks regarding threats/risks.  Contingency plans for enhancing security, medical response and evacuation, in place.	Medium	Low	<b>Treat:</b> Conduct dynamic risk assessments in line with identification of emerging threats.  Enact contingency plans to delay activity, move delivery to alternate locations or use remote means.  Enhance security measures appropriate to threat posed.  <b>Terminate:</b> Remove personnel from risk affected area.	Torchlight / Authority
Context	<b>Host nation conflict</b> - Tensions with neighbouring states result in operational priorities removing ISF from engaging on this project and/or deteriorating security situation.	High	Low	<b>Treat:</b> Collaboration with the BEB and key Lebanese stakeholders to ensure appropriate prioritisation and access to carry on work with the limited resources available. Maintain flexibility through PDIA delivery.  Continued risk monitoring of political/security situation.  Contingency plans for delivery through remote means or alternate locations outside of country.	Medium	Low	<b>Tolerate:</b> Maintain project activity until situation deteriorates to unacceptable level of risk, guided by Authority and Host Nation partners.  <b>Treat:</b> Relocate delivery to alternate location or conduct delivery by remote means.	Torchlight / Authority
Context	<b>Political Will</b> - Shift in political will of HMG or Lebanese Govt delays or cancels part or all of project.	High	Low	<b>Treat:</b> Break clauses in staff contracts allow for response to changing requirements. Continuous engagement with Authority to monitor and respond to political shifts. Contingency plans to reconfigure project to respond to delays or cancellations.	Medium	Low	<b>Tolerate:</b> Minor delays to project absorbed by agile project management, flexibility in delivery and regular communications with client.	Torchlight / Authority
Reputational	<b>Negative Publicity</b> - The sensitive nature of this project can potentially put Torchlight and the Authority into a situation where inappropriately framed publicity of any sort, actual or fictitious, illicit activity are connected to our delivery.	Medium	Low	<b>Treat:</b> Maintain constant vigilance throughout delivery and interaction with stakeholders to ensure any evidence or rumours of activities such as Human Rights violations are identified, scrutinised and managed through official channels. Media awareness training to project team.	Medium	Low	<b>Treat:</b> Monitor open source & social media for emerging stories/narrative. Use project Strat Comms and PR SMEs to provide expert advice and consult with Authority on potential responses to counter / neutralise negative reporting. Development of agreed media Lines To Take (LTT) in consultation with the Authority.	Torchlight
Reputational	<b>Gender Sensitivity (GS) &amp; Human Rights (HR)</b> - The actual or perceived misuse of delivered capability enhancements target legitimate consent, specific confessional or vulnerable groups, resulting in HR allegations against ISF.	Medium	Low	<b>Treat:</b> Torchlight staff undergo GS and HR tailored briefings prior to deployment. Ensure GS/HR compliance is conducted as an integrated monitoring activity. Use existing monitoring /reporting mechanisms for concerns tailored to requirements of HMG's Lebanon OSJA from outset of project. Use of AIMS process to identify risk. Incorporate use of audit trail to document HR risk of delivery activities. Develop Gender Plan during Inception and implement throughout delivery.	Medium	Low	<b>Treat:</b> Use Torchlight Gender Advisor and JHRP Advisor to support delivery team to identify and mitigate residual risks. Use internal and external review mechanisms to identify, report and escalate & mitigate relevant risks.	Torchlight
Reputational	<b>Safeguarding</b> - Vulnerable individuals or groups directly or indirectly linked to project at risk of unintended harm as a result of project activities.	Medium	Low	<b>Treat:</b> Safeguarding training delivered to Torchlight staff prior to project delivery, refresher training throughout, to identify importance of safeguarding and signs of concern. Adherence to company Safeguarding policy. All staff informed on confidential reporting system. Establish monitoring and reporting mechanism with Authority at outset of project.	Medium	Low	<b>Transfer:</b> Communicate suspected safeguarding concerns to Authority for their action.	Torchlight
Fiduciary	<b>Fraud</b> - Mismanagement of HMG funds in the purchase of services or equipment compromises the integrity of the activities.	Low	Low	<b>Treat:</b> All Torchlight staff have training in identifying and preventing bribery and corruption. All staff are provided with HMG telephone reporting service as well as Torchlight's Whistleblowing policy details.  All purchases of equipment or services will done using EU approved procurement and supply chain quality assurance mechanisms, with appropriate due diligence processes.	Low	Low	<b>Treat:</b> Conduct due diligence on suppliers including on financial information.  Employment of experienced procurement and commercial staff with strong references.	Torchlight
Fiduciary	<b>Working capital</b> - Torchlight lacks fiduciary working capital to sustain project operations.	Low	Low	<b>Treat:</b> Torchlight has confirmed working capital to fund project for 4 months without payment from HMG. 30 day payment in arrears agreement with all sub-contractors. All payment based on agreed KPIs or deliverables which are signed off by the TL and PM.	Low	Low	<b>Treat:</b> Open dialogue with HMG on financial structures and management. Monthly project finance reviews; annual project audits. Annual independent company-wide financial audits.	Torchlight