

Our comprehensive duty of care measures, including safeguarding policies compliant with HMG standards, have been honed over our 8 years’ experience of safely delivering over 29,000 days in FCAS and our consortia’s safe operation throughout Lebanon since 2015. Over 65% of our team have in-depth experience of operating in Lebanon, bringing specific knowledge of likely key target areas that are considered unstable and volatile such as Aarsal as Hermel along the Syrian border or the Palestinian camps such as Ain el Hilweh. We also have local experts, such as former security sector agency (SSA) Generals, and PEA experts who will provide unparalleled contextualised knowledge of the environment. This allows us to know what is required to ensure safety of not only our personnel but also third parties affected by our activities. *Added benefit: This consortium experience will provide the BEB with reassurances that our duty of care will be both comprehensive and fit for purpose throughout the life of the programme.*

Our Duty of Care plan is informed by detailed understanding of the operating environment. Lebanon presents a diverse security environment with various security issues including terrorism, cross-border conflict, crime and political instability. Many of the areas we are likely to be operating in for this project – which will be identified during the initial inception phase following a thorough needs analysis and consultation with BEB – have a different risk profile to that of Beirut. With the exception of Mount Lebanon, which is primarily Christian with a strong concentration of the country’s Druze population centred around the Chouf, areas such as Sidon, Akkar and Baalbek-Hermel are predominantly Shia. The travel risks are higher in the South along the Israeli border where there are periodic exchanges of fire between Israeli forces and Hezbollah, and in the mountainous areas near the Syrian border. Militant activity in these areas remains a concern. Additionally, there is a comparatively higher prevalence of violent crime and unrest in the northern Bekaa Valley; illicit cannabis farming and the presence of large, mostly Shi’a Muslim clans that periodically engage in armed clashes contribute to the relative insecurity in this area. The Bekaa Valley also has a reputation for kidnapping, which is largely connected to disputes between local families and, in recent years, with the domestic consequences of the conflict in neighbouring Syria.

We will develop bespoke Duty of Care Plans cognisant of these differing risks and environments, with bespoke Health, Safety and Security (HSS) manuals for each governorate of the country, detailing specific risks, mitigations, and operating procedures. This will include bespoke travel arrangements (driver and standard vehicle or soft skin SUV) depending on the risks, distance from Beirut, state of the roads etc., provisions of alternative communications such as satellite phones and identification of local medical facilities which will also be vetted through Healix International, Torchlight’s medical responder who provide similar services to 24,000 British Government employees including from the Foreign and Commonwealth Office.

The table below provides an extract of our Duty of Care Planning Matrix for operating within Lebanon:

Governate	24/7 GPS tracking	Soft skin SUV	Use of former SSA drivers	No lone working policy	24/7 Medical Assistance	24/7 Emergency Assistance	HET Training Essential	ISF/LAF/GS invitations	Daily Status Reporting	Satellite telephones	Secure Accommodation	Route Clearance	Site Specific HHS
Akkar	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Baalbek-Hermel	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Beirut	✓				✓	✓	✓						
Beqaa	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Mount Lebanon	✓				✓	✓	✓		✓				
Nabatieh	✓		✓	✓	✓	✓	✓		✓	✓			
North	✓	✓	✓		✓	✓	✓	✓	✓				
South	✓		✓		✓	✓	✓	✓	✓			✓	✓

We utilise layered proactive initiatives to understand and manage duty of care on a real time basis. Our bespoke ISO 31000 and PAS 3001 compliant procedures are all underpinned by Torchlight’s ISO 9001:2015 certified management processes and procedures to govern our obligations. This includes: formal and dynamic risk assessment and mitigation; detailed property and site security plans; secure and effective communications; working in close partnership with the Authority (particularly the security manager in the embassy in Beirut); appropriately assessing and equipping staff; providing appropriate and ongoing training / briefings; and continually honing, testing and enforcing our comprehensive Company Operating Procedures (COPs), which keep management of risk as a central tenet throughout.

Our COPs form the framework for our Duty of Care plan that has been extensively tested and externally audited by our Insurance Brokers to confirm it meets their recommended standards, in which core elements include: *Operational Instructions, Communications Strategies, Medical Evacuation Plans, Critical Incident Management Plans, Political Evacuation Plans, Insurance Cover, Mandated Training (hostile environment, safeguarding, HR compliance, bribery and cyber security)*. This is supported by Torchlight’s HR Manager who maintains a record of all mobilisation activity and relevant duty of care information that is provided to team members as an audit trail. As part of our continuous improvement model, these plans are regularly updated and are signed off at Torchlight Group Board level, where duty of care and safeguarding oversight is owned.

In developing our risk assessment, we include factors that could have an impact on the safety and well-being of our personnel and sub-contractors, project stakeholders and beneficiaries, as well as those that could impact our successful project delivery (see Risk

Matrix in Section 1.2.2 for examples). We consider policy, political, security, infrastructure and environmental factors. Following best practice, we prioritise risk in terms of the multiple of the 1-5 scored likelihood and impact it could have on our dependants and the project. We mitigate where appropriate, and formally monitor indicators of a risk being manifested, and manage them accordingly.

We believe that local security and risk factors are never stagnant and will therefore update and adapt our HSS plans on a quarterly basis following a review by our Security Manager, or in the case of an incident such as a terrorist attack or an increase in kidnappings. All our HSS plans will be readily available for the Authority to review and assess.

Our process of monitoring our staff is commensurate with our risk management plan. Our continuous management of risk, projects and performance, is informed by monitoring including:

- ▶ **Daily and Regular Communications** – especially for lone workers, and those in areas of risk. A comms plan will be included in each Health Safety and Security manual and will identify the primary, secondary and tertiary means of communication. All team members in country will be issued with local mobile phones with data connectivity upon arrival which will be maintained by our Beirut office. These will be enabled for international calling, allowing for emergency calls such as to Healix to be made. In the event of lack of mobile coverage or the outage of mobile networks, landline phones will be made available in offices and accommodation.
- ▶ **Regular Video or Physical Meetings** – to confirm wellbeing of team and provide security updates. This will include the HQ team conducting checks on the Beirut office, and the Beirut office conducting checks on teams when not co-located.
- ▶ **24/7 Medical and Emergency Assistance** – all Team members are routinely briefed on our set Emergency procedures which are essentially managed by our medical provider, Healix International, through a 24/7 emergency service that will provide all relevant details to ensure appropriate care provision. This is supported by Torchlight's 24/7 Ops Team, and local security manager, who will guide the team / individual and lead with all non-medical aspects of the situation.
- ▶ **Employee Assistance Programme** - recognising the stresses of working in challenging environments, as an added benefit to the wellbeing of our team, our Employee Assistance Programme makes available free and confidential counselling and advice on a wide range of work and personal issues (with mental health and wellbeing professionals on hand).
- ▶ **24/7 GPS-Based Tracking** – should any of our team be operating in an area designated as 'high threat' or extremely remote, we have the facility to implement 24/7 GPS-based tracking of personnel through our Crisis Management partner Healix International Ltd. This tool allows us to monitor our staff on a live and ongoing basis with the option of directly communicating through the app. We currently employ this on a project in Kenya where staff are required to travel to remote locations where mobile phone and IT facilities are inadequate.

We recognise the risk of working in FCAS environments where our team may be exposed to vulnerable individuals and take Safeguarding very seriously. All staff, associates and sub-contractors are required to go through our mandatory company safeguarding training and all employment / engagement contracts have clear wording on our safeguarding policies and COPs, which they are required to read and sign before delivery. This also extends to any local partners we engage. Our safeguarding COP is designed to be fully compliant with HMG regulations and recommendations for safeguarding and should any safeguarding issues arise, we will bring them to the Authority's attention immediately to consult on actions to be taken.

Ensuring safe travel within Lebanon. Our Security Manager will work directly with the BEB Overseas Security Manager (OSM) to establish an agreed process to seek HMG clearance to travel to areas that are deemed restricted. This will be accompanied by a full risk assessment of the area of concern utilising multiple sources of information and a security plan outlining the specific measures that will be taken which may vary per area, providing the BEB with as much notice as possible. Travel will only be arranged once clearance is approved.

Based on our experience working in Lebanon, we will maintain a discreet profile during delivery driven by intelligence led response to security risks. Our Security Manager will maintain oversight of this at all times. As the risk level in Beirut is lower and more stable than in other regions, no specific security provisions will be in place, but continual monitoring will occur. For any movements outside of Beirut, the team will be moved by drivers who are former ISF and will provide a liaison function to other security agencies to ensure safety of our team throughout the country. Should there be any escalation to threat, our Security Manager will use pragmatic judgement to advise on what can and cannot be achieved under the current profile.

Our procedures for responding to incidents including medical emergencies are routinely tested, allowing us to continually refine our processes. Prior to delivery we will test all our medical and emergency procedures with our partners and emergency responders. This is to ensure that we fully understand, for example, the process and timeline that may be required in order to get an ambulance or other emergency services vehicle to a location. This may include conducting an exercise with our medical and insurance partners, utilising the project locations, or routes to, as the site of the emergency. As part of our pre-contract preparations we have already discussed and confirmed coverage for Lebanon, requesting details of all approved medical facilities and establishments so that documentation is in place in advance should they be needed. *As part of our insurance coverage, Healix offers comprehensive emergency evacuation services that may be required for political evacuation or medical evacuation (medivac).* Once Healix has advised that an evacuation is required, they make all the necessary arrangements to ensure that the individual receives the appropriate level of care.

It works! In 2018, a project team member in west Africa was taken ill. The Team Leader engaged our emergency procedures and within 2 hours he was in an approved medical facility.

Upon confirmation of a viral infection he was stabilised and on a flight back to the UK within 8 hours.