

<p>1.4.1 (4.1)</p>	<p>Explain the threats and risks as you see them, including contextual and project-specific risk, how these may impact on the delivery of services under this Agreement, and how you will manage these risks and mitigate against them.</p>	<p>Pages: 3</p>	<p>Points: 70</p>
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Local/Regional Risk Factors. Political. On 4 November 2017, Saad Hariri resigned as prime minister in a televised address from Riyadh, citing Iranian interference in Lebanon, Hezbollah’s arms, and fear of assassination as reasons for his resignation. His announcement effectively ended a period of relative political stability in Lebanon, which began with the appointment of Michel Aoun as president in October 2016 after 2 years of the post being vacant. Hariri was reappointed prime minister in parliamentary elections held in May 2018, which were based on a new electoral law agreed upon in June 2017; Hezbollah also made significant gains in these elections. This could be an alert trigger for possible Israeli intervention, especially in the southern border regions.

Internal Security. Lebanon presents a diverse security environment with various security issues. As in politics, the leadership of the country’s security agencies is also appointed along religious lines, with the Internal Security Forces (ISF) traditionally led by a Christian (General Joseph Aoun), the Lebanese Armed Forces (LAF) by a Sunni Muslim (Director General Imad Othman) and the General Security Directorate (GSD) by a Shi’a Muslim (Major General Abbas Ibrahim). The General Directorate of State Security (GDSS), which reports directly to the President and Prime Minister, is currently led by Major General Tony Saliba, a Maronite Christian. Terrorism currently poses more of an incidental than a direct risk to foreigners, with most attacks targeting personnel and facilities associated with the Shi’a Muslim movement Hezbollah, Shi’a civilian areas and occasionally politicians. Attacks have occurred throughout the country, but central areas of the capital Beirut are rarely the focus of militant activity. Nevertheless, there is a low, but credible risk of attacks targeting Westerners, as evidenced in January 2017 when the security forces thwarted a suicide bombing at a popular coffee shop in Beirut’s Hamra neighbourhood.

Syria-based Sunni extremist groups. Syria-based Islamist extremist groups, most prominently Islamic State (IS) or ‘Daesh’, and the Al Qaida (AQ) affiliate Hay’at Tahrir al-Sham (HTS), have emerged as significant threats in Lebanon. Until August 2017, both groups maintained a presence in Lebanon’s north-eastern border area. Separate operations by Hezbollah and the Lebanese Army drove out the militants from their positions around Aarsal, Ras Baalbek, and al-Qaa, which they had occupied since 2014. IS and AQ-linked groups claim that they were drawn into Lebanon because of Hezbollah’s involvement in the Syrian civil conflict alongside the government, and both groups have claimed responsibility for a number of suicide attacks against Shi’a civilian areas in the Bekaa Valley and the southern suburbs of Beirut. Irrespective of the August 2017 border operations against IS and AQ, both groups retain a presence in Lebanon despite the lack of popular support among the Sunni population.

Human Rights compliance within the CT arrest to trial process. CT detention times are clearly defined under Lebanese legislation as 48 hours, with a further 48-hour extension prior to court appearance and further remand in custody for further enquiries or pending trial. In the course of our engagement with the four primary security agencies as part of the initial mentoring phase of this project, there were no obvious human rights breaches uncovered in this area, and indeed elements of good practice have been highlighted. However, there is clear anecdotal evidence of concerns of ill-treatment of detainees within the Criminal Justice System. Most of the cases passing through the Courts system rely exclusively on uncorroborated confession evidence, often leading to claims and allegations of mistreatment and cruel, inhuman or degrading treatment (CIDT) of detainees. So far in previous projects, there have been no specific examples of unlawful detentions provided, but sufficient comment was made to justify further examination of this subject area to allay any fears around potential Human Rights breaches. Throughout our engagement with the End Users, we will observe and note where Human Rights infractions are suspected and will seek counsel with the Authority at the earliest opportunity, providing a full report of our concerns, before agreeing the appropriate course of action, noting the importance of discretion given the impact this would likely have on the relationship with the End Users.

Duty of Care. Torchlight’s operational team are highly experienced in developing and implementing appropriately informed, contextualised and effective Duty of Care plans which are underpinned by proactive risk identification and management. Our persistent presence in complex and high threat environments since 2011 has informed the development of detailed (and proven) Standard Operating Procedures (SOPs), tailored to the specific operating environments. These SOPs form the framework for our Duty of Care Plan that includes: Deployment and Administrative Instructions, Medical Evacuation Plans, Critical Incident Management Plans, Safeguarding Policy, Evacuation Plans, Insurance Cover (including K&R)¹, and Mandated Training (SAFE, SAFE Plus). As part of our continuous improvement model, these plans are regularly updated and are signed off at Board Level.

Risk Management Contingency planning is fundamental to our ISO 9001:2015 approach to operational delivery and starts with context-specific project assessments that are developed through close working relationships with all stakeholders, to capture risk at the outset. We have a number of assessment frameworks at our disposal (such as PPPLEM, SWOT, THRIVE, DLODS) to generate a range of perspectives on the project and establish the likely risks to the Authority, Torchlight personnel and third parties affected by our activities. We baseline specific projects risks against other projects in the same region and/or client / beneficiary, along with a broader programme view of risks such as Bribery and Corruption and Fraud (all relevant SOPs are available upon request). As per Duty of Care, Risk is managed at Board, programme and individual project levels.

Project-specific risks. In consideration of project-specific risks, our contingency plans are set out in the below risk matrix overleaf:

¹ All project team members are covered by Torchlight’s worldwide, comprehensive Personal Accident (PA) and Medical Insurance through Starr Assist and their partners Healix International or an equivalent provider. This is a group personal accident and illness policy including flight, terrorism and war risks. This includes 24/7 emergency hotline with qualified medical professionals.

Risk/Threat	Affect/Impact	Likelihood (1-5)	Risk Level	Mitigation	Contingency	Owner
Host nation conflict with neighbouring states. Borders with Israel remain susceptible to potential conflict and the eastern and northern borders with Syria remain fragile through foreign fighter movement.	The security situation could deteriorate to such a degree that operations in Lebanon and Beirut would be untenable. End Users in the LAF, as well as other security agencies such as ISF and GSD, may be diverted to support operations, rendering them unavailable for this programme.	2	Med	We will seek to collaborate with the Authority and key stakeholders within the End User organisations to ensure appropriate prioritisation and access to areas to carry on work with the limited resources available. Using Threat/Risk monitoring, newsfeeds and local information, we will monitor the security situation and liaise with End User clients on most appropriate course of action.	Increase collaboration and engagement with the End User client where possible to impress on them the importance of the programme, balanced against the risks. If the security situation deteriorates to such a degree, we will discuss levels of activity with the Authority and possibility of escalating readiness states detailed within the evacuation plan.	TLG / Auth
Internal politics/breakdown in political process.	This could affect aspects of programme activity, such as freedom of movement, End User availability, degradation of the critical national infrastructure and the use of the international airport resulting in suspension of the programme delivery.	2	Med	We will engage actively with principal points of contact to ensure appropriate prioritisation and availability to areas and people to carry on work with the limited resources available. We will seek assurance from organisational command of commitment to the programme.	Increase collaboration and engagement with all amenable parties to maintain programme continuity. If the security situation deteriorates to such a degree, we will discuss levels of activity with the Authority and possibility of escalating readiness states detailed within the evacuation plan.	TLG
Terrorism. Emphasis of groups operating in border areas is on destabilisation.	Any successful or attempted attacks against our staff, HMG or the End User is likely to have a destabilising effect on the programme delivery (including access to sites, personnel and willingness to continue).	1	Med	We will continue to build and maintain strong relationships with key stakeholders within End User organisations. Any event can be used as an opportunity to mentor and test procedures. Concentrate areas of operation to known safe areas in and around Beirut.	If possible, we will use the cover of End User for assistance in movement. If the security situation deteriorates to such a degree, we will discuss levels of activity with the Authority and possibility of escalating readiness states detailed within the evacuation plan.	TLG
Civil unrest. Local demonstrations and protests can bring parts of the country/Beirut into lockdown.	Local demonstrations prevent freedom of movement and can cause increasing levels of violence in localised or widespread areas of the city or region, hampering ability to conduct activity with End User.	3	Med	In addition to utilising our local networks, we will maintain a close watch on the local and regional political news, indicators and warnings. These can be maintained through close collaboration with the End User and regular updates from Threat/Risk groups and newsfeeds.	Identify alternative operating areas of known areas of unrest. Seek to utilise the assistance of the End User to manoeuvre around the area unhindered.	TLG

Reputational risk	<p>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. This may require pulling away from the project for a protracted period of time or the transfer of delivery to another organisation due to the potential stigma associated with the implementing partner.</p>	2	Med	<p>Torchlight will maintain constant vigilance throughout its 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 chains to either prevent leakage of fictitious information or ensuring that the perpetrators are identified and held to account.</p>	<p>Accurate collation of project activity and any sensitive engagements are reported to provide evidence of no-wrong doing. Any suspected activity associated with the project deemed to be sensitive or offensive are reported to the authority and the situation monitored from a suitable distance. Media lines to take in the event Torchlight group or the associated Authority are publicly accused of any association to illicit activity.</p>	TLG
Gender sensitivity	<p>Any perception of gender inequality associated with the project may have reputational risks for both the implementing partner and the Authority, particularly amongst other contributing nations.</p>	2	Med	<p>Torchlight actively integrates gender equality into all of its programmes and is a key driver in-line with authority initiatives. Any activity that is deemed as counterproductive in achieving this is appropriately and proportionately responded to in order to influence the long-term perceptions of the stakeholders involved.</p>	<p>Any identified activity that counters this initiative will be reported to the authority and an agreed course of action will be determined at the project management level.</p>	TLG / Auth
Further call-down expertise required & potential rotation of staff	<p>Capability gaps may delay project delivery and distort workstream timelines; having potential knock on effects with wider programming</p>	2	Med	<p>Torchlight have resourced personnel that have as wider, relevant, skillset as possible in order to deliver this as well as shortlisted associates in our data base able to support.</p>	<p>Torchlight maintains a database of over 300 associates relevant to thematic delivery; enabling rapid engagement and short notice deployment.</p>	TLG
Lack of institutional buy-in, end user participation & access to facilities	<p>Detrimental impact on Torchlight's ability to conduct mentoring and training delivery.</p>	3	Med	<p>Building on Torchlight's previous engagement with the End Users and Authority support will emphasise the importance of the programme. We will ensure early coordination and coherence with the End Users' own vision and intent remains extant. Senior stakeholders will be briefed on the need for access to End User facilities. Regular and effective stakeholder management and provision of clear resource requirements to the LAF.</p>	<p>Our specific understanding of the end user gives us a nuanced approach that will motivate them to engage even without explicit direction. Torchlight group will leverage its social capital through significant stakeholder mapping and engagement. Production of a Letter of Intention (<i>Note Verbale</i>) at earliest opportunity. Ensure receipt of acknowledgement and acceptance, backed up by regular and effective stakeholder management.</p>	TLG / Auth