

The Authority requires an Implementing Partner that is low risk with extensive experience successfully managing and delivering CSSF programmes. Torchlight’s work for CSSF across the Middle East, North Africa and South Asia, including multiple years of delivery on highly relevant programmes in Lebanon and Morocco, means we are confident in our ability to proactively identify and manage risk ensuring the project *meets and exceeds its objectives*. We identify the highest risk to the programme delivery as **Human Rights**--the provision of additional tactical capability using the latest technology and investigational skills enabling partner nations to recover vast swathes of data of both private and personnel nature may be misused, breaching the rights and liberties of its citizens and leading to human rights concerns. To mitigate this, our approach ties together strict compliance with the UK’s Overseas Security and Justice Assistance (OSJA) Guidance, International Human Rights, and recognised data protection principles. Our risk mitigation strategy includes provision of assurances and safeguards in the form of clear policies and guidance on proper usage to ensure working practices conform to the standards set and legal powers and where abuses are identified, they are reported on immediately. Misuse of data could lead to criminal and civil actions and/or contribute to miscarriages of justice. Our mitigation strategy will (a) analyse, assess and risk assess all material (b) set out clearly the threats to citizens’ rights and how protection and classification of material is undertaken, (c) work within the framework of the countries laws, ensuring the principles of Capturing, Exploiting and Analysing evidence is lawful and support fair justice outcomes. Some risks which are specific or particularly relevant to this project, with an outline of our mitigation approach include.

Category	Risk	L	I	R	Mitigation	RR
Political	Terrorism: we assess that terrorism in all three countries currently poses more of an incidental than a direct risk, with most attacks targeting personnel and facilities associated with the security forces and occasionally politicians and political parties and their communities. This is not to discount the threat posed by radicalised individuals or former terrorist fighters (FTFs) now widely dispersed across the region.	H	H	H	Working with the three beneficiaries will increase the risk to our project staff. All staff will undergo pre-deployment Hostile Environment Awareness Training (HEAT). Using Threat/Risk monitoring services, newsfeeds and local information, we will monitor the security situation and liaise with the Authority and partner organisations regarding threats/risks on route and in the vicinity of accommodation and project-focused sites.	M
	Lack of Engagement: given the multiplicity and complexity of political actors, including formal and informal security and justice actors in all three jurisdictions, this project will be subject to challenges as a result of competing priorities, inter-agency rivalries and shifts in political dynamics within beneficiary organisations and across the wider political landscape.	H	H	H	Our approach is to (a) deploy only highly experienced international experts with the proven ability to establish immediate professional credibility; and (b) adopt a proven collaborative rather than interrogative methodology, using the initial scoping exercise (Output 1) as an opportunity to <i>build on our existing relationships with the target beneficiaries in Lebanon and Morocco</i> , and develop new relationships in the Maldives, promoting inclusivity and trust.	M
	Human Rights Concerns: we recognise that there are human rights concerns regarding the practices employed by SSAs in Lebanon, Morocco and the Maldives, and understand the impact this can have locally (negative public perception) as well as internationally (legal liability and/orreputational damage to HMG).	H	H	H	Incorporating HMG’s recognised four-stage ‘AIMS’ (Assess, Identify, Mitigate, Strengthen) model for human rights management as a continuous activity to produce specific impact assessments for all security and justice uplifts that may result in: changes to law, policies, capabilities of the institutions, and directly or indirectly lead to the identification, investigation, arrest/detention, prosecution of liberty of individuals.	M
Project	Lack of participation of relevant personnel and access to key stakeholders, sites and agency data: Reduction in stakeholder engagement impacts beneficiary ‘buy-in’ failing to provide ‘authority and mandate’ for programme delivery and impeding access to appropriate personnel, sites or information.	L	M	L	Developing relationships of trust rapidly upon award is key. We will seek to leverage our existing relationships with the target beneficiaries in Lebanon and Morocco and develop new relationships in the Maldives, to ensure access is given to the right people, sites and resources required to make this project a success. We will also liaise closely with the embassies in each country to help generate and secure commitment from all relevant stakeholders.	L
Management	Human Resources challenges, including short notice absence of key staff.	L	H	M	With 40 full-time employees (90% of whom are cleared to DV or SC levels) and 300 trusted expert associates, we have resilience and capacity to deliver multiple tasks concurrently, maintaining continuity whilst minimising the administrative burden on the Authority. In the case of short-term absences, we draw on our internal team of specialists for immediate substitution.	L
	Bribery and Corruption: Morocco ranked 73 out of 180 on the Transparency International 2018 Corruption Perceptions Index, the Maldives 124, and Lebanon 138. Corruption remains a major problem in all three jurisdictions and is particularly prevalent among public sector workers where wages remain low.	M	H	M	All our Staff and Project Experts receive UK trained in identifying and preventing bribery and corruption and provided with HMG telephone reporting service and Whistleblowing policy details. All purchases of equipment or services will be done using EU-approved procurement and supply chain quality assurance mechanisms, with appropriate due diligence processes.	L