Albany has, for more than a decade, operated sensitive programmes on behalf of HMG in some of the most dangerous and volatile places on the planet including Somalia, Libya, Iraq and Afghanistan. Our organisational ethos, in which the well-being and safety of staff is an absolute priority, our experience in risky environments, and the background many of our managers have in the military combine to result in a professional, no-nonsense approach to Duty of Care. Albany believes that Duty of Care responsibilities extend to staff (international and local) partner organizations, stringers, and to beneficiary communities. Of course, the configuration is different for each cohort. Staff safety is our responsibility but we will work with HMG closely in terms of any guidance or directive that may be issued and information sharing. Duty of Care is an integral part of our regular situational/context analysis and reporting to HMG. Our risk register is updated regularly and will be shared with the CSSF project manager. Naturally in case of a critical incident we will inform and work with HMG.

Albany has an **ISO-certified security and crisis procedure and a Safety and Security Protocol** for deploying Albany staff and contracted consultants. This includes: Location Assessment – including general threat level, risk mitigation; Project Assessment – including the attitude of the public and security forces and overview of the situation; Deployment Assessment - including accommodation, administration, travel and transport; Individual Assessment – including proof of life, personal details, medical condition, inoculations and allergies; Key Contacts Emergency Numbers and Communications Instructions – including a requirement for our project consultants to communicate daily at 10am UK time and advise of any changes in overall status; Medivac emergency/incident plans and systems.

Preparation is key to crisis response and we are rigorous in conducting proper independent assessments, providing general plans, protocols and procedures and modifying these for the local conditions of every contract we undertake. We ensure that all contract staff are properly briefed and trained to ensure they are aware of risks, protocols and procedures. **We contract qualified independent security advisers to conduct assessments** and make recommendations including identification of local and regional medical evacuation agencies covered by our robust insurance policy. When an international team member was kidnapped in Libya our crisis management plan was activated, we liaised with Foreign Office Consular Services, security services, the staff member's family, and our networks in Libya. The staff member was released unharmed within 48 hours. We learned from this experience, have since included kidnapping in our HEFAT training, and are able to provide tracking devices to vulnerable staff where warranted.

While we will expect and insist that our Consortium partners also have and follow Duty of Care protocols – and if necessary will provide capacity support to assure that – Albany Associates also recognises that Duty of Care, is more than a paper exercise. It has to be organisation-owned. **This iteration will be communicated to HMG in the form of a project-wide policy, which will be subject to regular review.** The risks, profile, assets, and posture of foreign organisation members of the Consortium will be different than for Syrian organisations and we will respond to this reality. We are aware that while much of the Duty of Care protections are extended to international staff, in fact national staff are the majority and they are often far more vulnerable and likely to come to harm than the professionals and our approach responds to his reality. We had an incident involving a prominent Somali freelance journalist working for Radio Bar Kulan and indirectly on our payroll. The journalist, a resident of Mogadishu, had left the studio one night and was on his way home when he was shot in the street by an Al-Shabaab fighter and seriously wounded. We became aware of what had happened when his colleagues called and we immediately took steps to ensure that he was moved to the AMISOM hospital inside the military compound. We also moved his family to safety in the compound. We then arranged for him to be evacuated to the Aga Khan Hospital in Nairobi where he made a full recovery. Concurrently, we moved his family to Nairobi and supported them financially until they were comfortable to return. Albany knows from experience that national staff may take undue risks in order to protect their jobs or earn extra money and that international staff may engage in risk taking behaviors from boredom, ignorance of the environment, or a sense of being inviolable. We address these realities in our policy, our management of people, and our management of the workload.

In recruitment we give full attention to assessing how a candidate responds to stress and risk. Not only are we cognisant of safety and security considerations, we take care of managing people's time carefully in dangerous locations and encourage a work environment that lends itself to reduction of risk factors. Albany Safety and Security Protocol (SSP), detailing responsibility and immediate response frameworks, is reviewed and signed off by the personnel deploying, the Managing Director and the Head of Human Resources and Administration (HRA) before any deployment is authorized. We continually engage with all appropriate regional and local security institutions to ensure that we are abreast of all possible threats and levels of risk, particularly at sensitive times.

Syria, is a very high risk environment – highly militarized and weaponised, politically unstable, absence of rule of law, and a history of a lack of tolerance for freedom of speech and the media. The latter factor is greatly exacerbated by the presence and control of profoundly non-permissive groups such as Al Qaeda and ISIS. Compounding a non-permissive environment, many Syrians are justifiably fearful and suspicious of one group or another and this makes media, information collection, reporting, and analysis deeply sensitive and risky topics. While risks inside Syria are dramatic, the three border countries from which the Albany Consortium will operate – Turkey, Lebanon, and Jordan also pose risks and challenges that must provoke Duty of Care considerations. These include increasingly non-permissive environments for media and for Syrians and significant bureaucratic challenges to things like staff residency and work permits that can leave individuals and the organization exposed to harm. Albany perceives and understands these risks and our project design is calibrated to respond as a part of integrated Duty of Care. For us, Duty of Care is not simply a policy, it is the way the work is planned and executed.

The MOR project will develop security operating instructions (SOIs) in collaboration with key staff and Consortium partners, which includes Syrian organizations. In an ideal world, we would wish to include all staff in development of the instructions, particularly those in the deep field. We recognize, however, that in the context of Syria, staff are unlikely to be able to move across borders and it is hard to hold the attention of many people functioning in two languages on Skype across multiple locations. We also know from experience that it is often the staff one is most concerned about – the front line and field staff – that are most likely to be dismissive of security considerations because they are inured to violence and unpredictability. They may see safety considerations as superfluous and 'nannying'. Recognizing this common phenomenon in all the areas where we work, Albany realises Duty of Care to these staff through calibration of their workloads, deliverable schedules, benefits (including leave) and their overall management. Thus Duty of Care becomes a seamless part of line manager, human resource, and senior management roles. Staff who breach security requirements face clearly articulated disciplinary consequences.

Regarding cyber security and taking the necessary duty of care precautions. This will be integrated throughout by keeping our specialized consultant's input alongside other project-wide activities and communications, and will not be an external and occasional input. There are many actors with sophisticated cyber-capabilities in Syria who would see the work of the MOR project as inimical to their interests. Albany Associates is also deeply sensitive to the need to protect the reputation of HMG, as well as our own and that a hacking incident could be extremely damaging. It is the consortium's responsibility to provide protection for ALL information. This protection will be proportionate to a given risk and what that risk poses; a breach in cyber security can result in the revealing of, say, a stringer's identity. Therefore, the Consortium will:

- Establish and enforce sound information and system security policy;
- Maintain an organisation to manage all information and system security;
- Ensure that risks are reduced to an acceptable level by applying protective controls based on the risk assessment of a given threat;
- Limit access to information and assets to authorized personnel only;
- Ensure that personnel have an appropriate level of awareness of information security policies;
- Regularly review security arrangements to ensure policy, standards and procedures remain relevant and effective;
- Continue to deliver Confidentiality, Integrity and Availability (CIA) based on direct and indirect threat assessment.

The measures we will take to deliver this include setting up boundary defence (e.g. firewalls, proxy servers, tactical zoning, IDS/IPS and network monitoring; strict network access control and continuous monitoring and analysis of audit logs IAW Good Practice Guide 13 (GPG 13); Inventory control of authorised and unauthorised software; Security configuration of hardware and software (device hardening); Continuous Vulnerability assessment and remediation; Malware defence; Wireless access control; Control of user and administrative privileges account monitoring and control; Incident response and management; and secure network engineering.
Albany retains Raul Rikk, a cyber security expert and a founder and former director of the NATO Cooperative Cyber Defence Centre of Excellence. To minimise those risks we have set aside a budget for policy and technological cyber security solutions and in particular to provide extra capacity building support to our consortium member Enab Baladi.