



Security and Risk Management Policy

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Foreword

This document constitutes the Security and Risk Management Policy of the CCL (Comité de Coopération avec le Laos). It describes the principles in force within the association, respected by its members, employees, and partners, and should be read in conjunction with the internal regulations, the administrative and financial procedures manual of the CCL, and other general and sectoral policies of the CCL. In the hierarchical order of the CCL's institutional documents, this policy is at the third level, after the Statutes, Regulations, and the Administrative and Financial Procedures Manual. It ranks first among the CCL's general policies.

This document is approved by the Board of Directors and the Management of the CCL. Additional procedures relating to security and risk management may be implemented within the specific framework of projects, at the particular request of technical or financial partners. However, they must be validated by the CCL management. If necessary, these specific procedures will be integrated into the project procedures manual. Otherwise, the procedures described in this document will be applied.

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Abbreviations

BoD	Board of Directors
CCL	Comité de Coopération avec le Laos
MoU	Memorandum of Understanding
DNH	Do No Harm
NGO	Non-Governmental Organization

1. Generalities

1.1. Objectives and Principles

The CCL has a broad approach to security that can apply to 1) a definition restricted to the physical safety of individuals and 2) a broader definition of the absence or limitation of risk. This document thus determines the CCL's security policy, whether physical or otherwise, in its areas of intervention, towards its employees, beneficiaries, and partners, through an institutional and programmatic approach, by minimizing risks.

This document sets the framework for other policies and procedures developed by the organization to support security objectives and risk reduction.

1.2. General Principles

The safety of employees is a priority for the CCL, as is that of local communities in project intervention areas and that of its partners. The CCL is based on the fundamental principle that good security management requires good risk management and analysis, which is achieved through the consideration of the principles of the Do No Harm approach.

It is essential to work on risk prevention to anticipate and minimize them as much as possible to limit the harm caused by the organization.

The CCL also recognizes that security management must be approached globally and transversally. It applies to all levels of the organization and affects all functions. Consequently, CCL personnel must respect internal regulations, procedures, and policies, as well as laws and local customs, as mentioned in the foreword.

2. Policy Levels

The CCL's security and risk management policy applies at different levels: 1) institutional and 2) programmatic.

2.1. Institutional Level

2.1.1. Policies and Procedures

The issue of security is vast and touches on various domains such as image, physical security, psychosocial security, etc. Therefore, the CCL is committed to implementing the necessary policies and procedures to minimize the risks of CCL interventions within communities in Laos.

This applies to the implementation of the following documents:

- Statutes and Internal Regulations
- Internal Regulations
- Anti-Fraud, Anti-Corruption, Anti-Money Laundering, and Counter-Terrorism Financing Policy

- Conflict of Interest Prevention and Management Policy
- Administrative and Financial Procedures Manual
- Gender Equality and Social Inclusion Policy
- Child Protection and Vulnerable Adults Protection Policy
- Environmental and Biodiversity Protection Policy
- CCL Charter

These documents are regularly reviewed and updated as needed.

2.1.2. Roles and Responsibilities

Good security management requires the involvement and discipline of everyone.

Practice and behaviors indeed play an important role in security and risk management. The CCL ensures that its personnel act professionally in accordance with administrative and financial procedures manuals, charters, internal regulations, and general and sectoral policies. Each project identifies a security and risk management officer responsible for enforcing this policy.

It is important that all the above-mentioned documents are attached to the employment contract of each employee who undertakes to respect them.

The CCL also provides training to each new employee upon their arrival in the organization. The training is delivered as follows:

- By the Director for the CCL Charter.
- By the Administrative and Financial Manager for parts related to administrative and financial procedures manuals, conflict of interest prevention and management policy, and anti-fraud, anti-corruption, anti-money laundering, and counter-terrorism financing policy.
- By the Program Officer for the security and risk management policy and other sectoral policies.

Reminders are also organized annually for all employees.

CCL partners also commit to respecting these rules and policies.

Negligence or non-compliance with the documents by CCL personnel or partners may result in sanctions, including termination of the contract.

All these documents are known and approved by the Board of Directors. They are also included in the agenda of the Board of Directors at least once a year. This agenda item aims to:

- Discuss emerging risks related to the evolution of the CCL's internal structure and the socio-economic situation of the intervention areas.
- Discuss the requirements or requests of CCL partners and donors.
- Discuss legislative and regulatory developments in France and Laos.

Discussions and decisions of the BoD on this subject may lead to the updating of this policy. A summary of the BoD discussions on this subject is recorded in the reports or minutes of the BoD meetings.

The various policies provide a mechanism for collecting complaints, which, if activated, can trigger an extraordinary BoD.

2.2. Programmatic Level

2.2.1. Risk Analysis

Security risks can occur at different levels: physical, psychosocial, or environmental. The drafting of a project includes an analysis focused on risks impacting the project's implementation capacity. This is a step required by the donor. However, it is important to recognize that our presence in the field can also bring unintentional harm to local communities. Therefore, it is crucial to have a good understanding of the cultural, socio-economic, political, and environmental context in which the projects are deployed and to take the necessary time to step back.

Risk management is thus integrated into the different project management stages:

- Before project design, through the analysis of beneficiaries' needs and understanding of local culture and power relations within communities (including all stakeholders and considering discriminated groups, especially women).
- From the project design stage, by integrating information on identified risks and defining mitigation measures and a complaint collection mechanism.
- During project implementation, through staff training, informing communities and obtaining their acceptance, and setting up a monitoring mechanism for possible negative effects generated by the intervention and their integration into support, monitoring, and evaluation missions.
- Upon project closure: a risk analysis to minimize negative effects on local communities, partners, and employed personnel (Chapter 10 of the administrative and financial procedures manual).

Below is a table of examples of negative effects of inappropriate practices and behaviors¹:

Inappropriate behaviors to the local culture (lack of respect...)	Power abuse (Exploitation, sexual abuses, corruption)	Non integration of external environment and of the local context
Non-respect of Humanitarian Principles	Data collection without considering protection and dignity of beneficiaries (lack of precaution in dealing with sensitive information)	Creation of expectations in which the action can not handle (needs analysis unfollowed)
Beneficiaries' selection leading to conflicts (power abus, process not well explained)	Projects and actions without involving the communities (interfere with community rules and practices, impose inappropriate cultural and familial schemes)	Unqualified staff providing services, disrespect of procedures associated to services
Weak sustainable strategies ; disregard of long term effect of the action	Purchase procedures negatively impacting on local markets	Lack of respect, trust and collaboration between aid organisations

2.2.2. Risky Practices and Behaviors

Projects are equipped with special tools to address risks during the project pre-design analysis. (cf administrative and financial procedures manual, chapter 9 on project development).

These tools are inspired by the Do No Harm approach, as shown in the example below:

¹ Prendre en compte le 'Do No Harm' : Agir sans nuire, comment faire ? Réflexions issues d'une revue des pratiques d'Humanité & Inclusion, p.12, Editions speciale avec le F3E, EP/07 Synthèse, 2018.



2.3. Risk of Social Change Work in Communities

Working on social change within communities has significant potential to destabilize relational and power dynamics within beneficiary groups and local communities. Social change work aims to influence power relations between categories of actors to reduce inequalities and discrimination against the most vulnerable (women, persons with disabilities, ethnic minorities). However, with the changes it brings, it inevitably creates tensions and negative effects that can lead to violence. It is then necessary to seek the "best possible compromise" through the support of beneficiary groups and communities to achieve the objective of social change while limiting blockages and setbacks. This issue is particularly sensitive when projects address gender equality and women's empowerment.