

Mahboba's Promise Quality Assurance Policy

1. Why this matters

Mahboba's Promise support some of the most vulnerable people in Afghanistan's society, including orphans, widows and young women. Our programs are designed, implemented and refined to ensure that our resources are used in the most effective way to deliver the greatest impact on the ground, while ensuring we do no harm through the work we undertake. This means the life-cycle of our programs are informed by good practice and are continuously monitored and adapted to the feedback we see and hear. This keeps us accountable to the people we work for, and the partners who support us.

2. Purpose

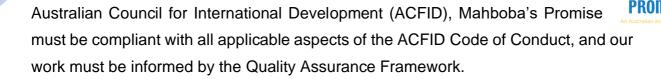
This policy helps ensure programs are well designed, implemented and reviewed to maximise value for money and ensure effective outcomes for those we work with. It provides a framework for quality assurance that outlines our approach for localised, sustainable development.

3. Scope

This policy applies to all MP employees, board members, volunteers, contractors, interns, researchers, visitors and work placements. It is also relevant for donors, vendors and suppliers who work alongside us.

4. Statement of Responsibility

We are first and foremost accountable to the affected populations we work with in Afghanistan – ensuring we deliver quality programs while protecting those we work with is our core mission. We are accountable to our staff and volunteers, whose commitment and belief in the work we do must be acknowledged and respected. We are accountable to our donors, particularly in ensuring value for money and supporting the development priorities they are working to progress. Finally, as a member of the



5. Principles

Our quality assurance principles are consistent with the ACFID Quality Assurance Framework summarised as a checklist in Table 1.

| Rights, protection | Do our programs respect and protect human rights and | | |
|--------------------|---|--|--|
| and inclusion | advance inclusion through the work we do? | | |
| Participation, | Do our programs enable sustainable change through the | | |
| empowerment and | empowerment of local actors and systems? | | |
| local ownership | Compensation of recommendations and expensation | | |
| • | Do our programs contribute to the realisation of | | |
| Sustainable change | , , | | |
| | sustainable development? | | |
| Quality and | Are our programs informed by evidence, planning, | | |
| effectiveness | assessment and learning? | | |
| Collaboration | Do we optimise our work through effective coordination, | | |
| | collaboration and partnership? | | |
| | | | |
| Communication | Do we communicate truthfully and ethically about our | | |
| | programs? | | |
| | | | |
| Governance / | Are we governed in an accountable, transparent and | | |
| | responsible way? | | |
| management | responsible way: | | |
| December | | | |
| Resource | Do we acquire, manage and report on resources for our | | |
| management | programs ethically and responsibly? | | |
| | | | |
| People and culture | Do we manage and support the people working on our | | |
| | programs fairly and effectively? | | |
| | | | |
| | | | |



6. Protocols

a. Program considerations

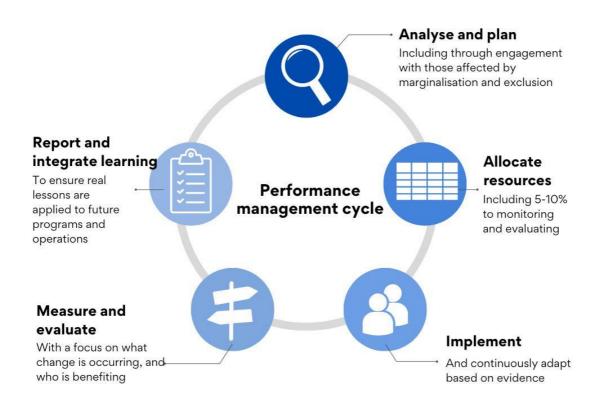
As a starting point, new programs, program amendments and program reviews should consider:

- Does this work align with our values?
- Does this work serve the women and children of Afghanistan?
- Does this work respect the laws of Australia and the locations they operate?
- Will this work be financially viable?
- Will this work align with our risk management framework and all MP policies?

These questions should be considered in partnership between Country Offices, local communities and MP Australia.

A risk assessment, child safeguarding assessment and situation analysis for new projects should always be undertaken MP uses a performance management cycle across its programs, summarised in Figure 1 below. The following sections detail how we apply ACFID's Quality Assurance Framework across the life-cycle of our work.





b. Rights, protection and inclusion



Our work is informed by a rights-based approach. We believe that respect for human rights will help lift people out of poverty and injustice, allow them to assert their dignity and guarantee sustainable development. Poverty, social exclusion and discrimination represent a denial of human rights, preventing people from exercising their full rights (e.g. to housing, adequate health care, education, to an adequate standard of living).

We acknowledge that human rights are for everyone, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class or socio-economic status.

MP focuses our development work on improving access for the most vulnerable, namely women and children. MP believes that opening up society to all members of the Afghan population will benefit the reconstruction process and improve the success of sustainable development projects.

Our Risk Management Framework sets out key considerations to protect the people we work with, and those that work with us, while our Child Protection Framework provides guidance on our approach to working with children (those under the age of 18).

b.1. Approach

Across our projects, programs and operations, MP is committed to:

Protecting those we work with from discrimination, violence, abuse, exploitation
or neglect based on an analysis of the context in which we are working.



- Providing training to staff and volunteers on a rights-based approach to development.
- Providing information about issues relating to human rights is promoted to the public and external stakeholders.
- Ensuring the inclusion and representation of those who are vulnerable and those who are affected by the intersecting drivers of marginalisation and exclusion.
- Ensuring our planning process includes consultation with those who are vulnerable and those who are affected by marginalisation and exclusion.
- Considering the potential impact of their development and humanitarian initiatives on those who are vulnerable and those who are affected by marginalisation and exclusion with a view to preventing unintended harm.
- Safeguarding of children.
- Preventing sexual exploitation and abuse, including by displaying statements about our commitments to PSEA and our complaints process in public places such as at head office and country offices and at project sites (in local language).

c. Participation, empowerment and local ownership

MP wishes to see Afghan communities become empowered to dictate their own future and we place a strong emphasis on localisation measures into development programs to ensure they have a sustained goal of empowerment and personal improvement.

MP sees local empowerment as an integral part of ensuring the projects and programs we implement in Afghanistan will become self-sufficient and make a lasting, positive impact on the communities we operate in.

c.1. Approach

Where possible, MP will emphasise teaching and empowering individuals to realise their potential rather than distribute ongoing welfare assistance. As such, our projects and programs will implement the following measures into practice to ensure the individuals and the communities we work with in Afghanistan are building on their capacities:

- Focus on teaching and developing vocational skills that address recognised needs within society.
- Assist in building infrastructure and providing resources that nurture income generation to allow projects and programs to be self-sufficient and handed over to Afghan communities.
- Allow equal and open access to programs and projects to ensure even the most disadvantaged are positively impacted by development work and capacity building.
- Encourage further training and education to improve knowledge and skills sets, allowing individuals and groups in Afghanistan to become independent of Mahboba's promise funding.
- Monitor the abilities of in-country workers to determine the impact capacity building measures are having and make changes where appropriate to promote this further.
- Maintain close contact with community groups/leaders and individuals involved in programs to gauge the positives and negatives of the work.
- Utilise a co-design planning process that takes into account the needs of the community it is being implemented into.
- Streamline program objectives and the implementation process to make it as accessible as possible to those in Afghanistan who are involved in the work.
- Provide adequate training to those in Afghanistan to ensure the program can continue to function independent of Mahboba's Promise.
- Incorporate localisation objectives in our MEAL processes.

d. Sustainable change

MP wishes to see Afghanistan rebuild itself into a peaceful, inclusive and prosperous society. The key to realising this is utilising sustainable development practices to achieve successful results from the programs we implement in Afghanistan. The ultimate goal of Mahboba's Promise's work is to allow the Afghan population to become self-sufficient and independent in continuing the reconstruction process of their society.

d.1. Approach

Economic Development

Our development projects have a clear long-term goal of enabling economic independence and self-sufficiency. Not only will this benefit the communities in which we operate in as they experience economic output and income generation, but it allows MP to continue developing new projects in other communities as the burden of funding is reduced.

Our development programs will:

- Consider the current needs of society through consultation to ensure programs address current economic and social needs.
- Take on a multiplier approach to development where the benefits of the program flow from the individuals involved into the broader society, improving the whole community's position rather than maintaining the status quo.
- Focus on empowering individuals and communities to become economically independent and self-sufficient.
- Provide individuals and communities with the skill and education necessary to generate income that is needed to maintain the program.



Afghanistan's environment has been decimated by decades of war, leaving the country with a lack of electricity, water, and infrastructure. MP believes that development work at the expense of the environment is counter-productive and will ultimately inhibit sustainable development. Therefore, MP programs take a local approach to development to avoid large scale impacts on the environment. This will be done through:

- Rebuilding infrastructure using materials that are locally and sustainably sourced wherever possible.
- Mainstreaming environmental awareness across our work in communities.
- Including revegetation initiatives in construction plans to improve the health of the environment.
- Promoting locally grown produce as a source of food and income for the community.
- Engaging in sustainable agricultural practices to protect the long-term longevity of the land being used.

Good Governance

Sustainable development cannot be achieved without good governance at the national, local and civil society level. As a grass roots organisation, MP operates using a bottom-up approach to development and reconstruction, so we focus our efforts on good governance at the local level. MP programs seek to promote good governance both through the implementation and continuation of development work within civil society.

MP will ensure that programs and projects:

- Are transparent in their operation and implementation.
- Develop strong partnerships in Afghanistan with civil society to empower them to take ownership of the work.



- Consult with the community throughout the duration of our programs to gauge the positive and negative aspects of the program.
- Foster a safe and inclusive environment.
- Promote the leadership abilities of those participating in programs to take on an active role in civil society.

e. Quality and Effectiveness

MP believes in continuous improvement. We integrate monitoring and evaluation into the design of our programs, allowing us to adapt program approaches in response to the evidence we collect, we hear and observe. At the conclusion of our programs, we undertake a final completion report, and where appropriate (see table 1), an independent evaluation to help inform the design future projects and integrate lessons to help us work more effectively.

e.1. Approach

Mahboba's Promise commits to allocating and generating the resources required for this Policy to be effectively implemented. In that respect, adequate financial support for evaluation must be written into and negotiated wherever possible with MP's donors. A dedicated budget line between 5% and 10% of project value should be included for all monitoring and evaluation activities for all projects.

Regardless of available donor funding, MP will budget for and undertake a minimum of one strategic evaluation (such as an ex-post or thematic evaluation) each financial year, in line with our commitment to learning and demonstrating impact.



All projects should be designed with a clear theory of change to understand and articulate how outcomes are intended to be achieved. This should include consideration of how the project will be inclusive, sustainable and do no harm. This provides the basis for monitoring, reporting and continuous improvement.

When making decisions about evaluation priorities, managers should consider:

- the overall cost of the program.
- the visibility and/or the risk associated with the program.
- the potential for scale-up, replication or leverage.
- financing and co-financing arrangements.
- the need to comply with inter-agency standards MP has signed onto (e.g., the ICRC Code of Conduct and Sphere standards).
- or widely used and accepted standards (such as the DAC Humanitarian Standards)

A broad guide for MEAL expectations both project size and duration is set out in Table 1.

Table 1 Project evaluation expectations

| | Project duration | | | |
|---|--------------------|----------------------|----------------------|--|
| Total project | Short-term; <1 | Medium term; 1-3 | Long term; >3 | |
| budget | year | years | years | |
| Small; <au\$20,000< th=""><th>Project completion</th><th>Baseline</th><th colspan="2">Baseline</th></au\$20,000<> | Project completion | Baseline | Baseline | |
| | report - internal | | | |
| | | Final Evaluation, | Final Evaluation, | |
| | | internal or external | internal or external | |



| Medium; | Final | Evaluation, | Baseline | | Baseline | |
|--------------|-------------------|----------------|----------|------------|----------|------------|
| AU\$20,000- | interna | al or external | | | | |
| \$100,000 | | | Final | Evaluation | Final | Evaluation |
| . , | | | (incl. | endline) | (incl. | endline) |
| | external external | | al | | | |
| Large; | Baseline | | Baseline | | Baseline | |
| >AU\$100,000 | | | | | | |
| | Final | Evaluation | Final | Evaluation | Mid-ter | rm review |
| | (incl. | endline) | (incl. | endline) | (extern | nal) |
| | external | | extern | al | | |
| | | | | | Final | Evaluation |
| | | | | | (incl. | endline) |
| | | | | | externa | al |

All program / project evaluations should consider:

- Relevance (focus on what is important).
- Participation (of community representatives).
- A focused impact on the lives of people (significance).
- Credibility (objective and reliable methods).
- Integrity (ethical standards) by staff members and external evaluators.
- Transparency (willingness to share findings).
- Independence (of evaluators).

Where possible, Mahbobas Promise will conduct annual strategic evaluations where restricted or unrestricted resources can be obtained. This supplements evaluations of individual projects by allowing a focus on issues or themes of importance to Mahbobas Promise, which can build a broader picture of MP's impact. Strategic evaluations may include:



- ex-post evaluations undertaken at least 18 months following completion of project activities, to assess the sustainable impact of MP interventions.
- cluster evaluations, which assess a number of projects within a given country
 or region, to assess where possible the synergy of multiple projects (by MP and
 others) to achieve higher- level impact.

e.2. Implementation and Responsibilities

Roles and responsibilities for evaluations are outlined in detail in the Mahbobas Promise Program Quality Framework. In brief:

- Country Offices (COs) have primary responsibility for planning for and supervising project and program evaluations, with support from the relevant MP member. Responsibilities include developing Terms of Reference for evaluations for review by MP member before signoff; recruiting consultants where needed; undertaking or overseeing field research, consultation and analysis; finalising evaluations based on review and comments on the draft; and preparing and following up the CO management response to the recommendations of the evaluation report.
- A Joint Plan for the evaluation process will be agreed between the CO and International Programs (IP), setting out key steps, inputs, roles and scheduling. Subject to the Plan, IP may provide support to the CO in drafting of TOR, recruitment of consultants, provision of technical input, in-country support for field logistics, review of draft report, and liaison with the Australian donor on follow-up action.
- To support improved evaluation practice in the Australian portfolio, the Quality & Impact Branch (QI) will develop, disseminate and update relevant tools (with input from International Operations (IO), COs, IP); assist COs as requested on evaluation methodology issues; review draft evaluation reports; compile and analyse Evaluation Summaries from COs, so as to disseminate findings and lessons learned from evaluations within MP and beyond; and post Evaluation Summaries or reports on the Mahboba's Promise website, and the MP

Electronic Evaluation Library. Publication should be subject to due consideration around potentially sensitive content (eg beneficiary case studies, photographs of children, quality of report, host government political sensitivities).

- The annual Mahboba's Promise's Programmers' Meeting (coordinated by IO, with support from IP) will include review of evaluative activities and systems within Mahboba's Promise.
- QI will be responsible for planning and management of strategic evaluations funded by Mahboba's Promise.

It is recognised that operational factors outside MP's immediate control may affect the ability to fully meet all aspects of the Evaluation Policy in every case. These may include environmental constraints due to emergency or security; donor constraints such as unwillingness of some donors to adequately resource evaluations; varying capacity settings across Country Offices; and availability of qualified and affordable consultant expertise in evaluation. Mahboba's Promise and Country Offices are expected to make best efforts to address these issues; where difficulties are encountered, these will be flagged at the earliest opportunity for discussion between both parties so as to agree the best available alternative approach.

f. Communication

Mahboba's Promise is committed to communicating accurately, respectfully and in ways which ensure the dignity and privacy of those we work with through our programs. Telling the stories of our work we do helps build awareness of the need for this work, raise our public profile and support ongoing investment and commitment from donors, stakeholders and partners. However, in collecting and using images and stories, we have a responsibility to protect the people that we are portraying, and to communicate truthfully with our audiences. We must ensure that all content is collected and used ethically, honestly and sensitively and with respect for people's dignity and culture.

f.1. Approach



MP will ensure that in our work:

- Images and stories collected must be authentic. They must accurately and respectfully depict the person, their lives and experiences, their story, their environment, their relationship to MP's work, and the context of their situation.
- We do not want to perpetuate the stereotypes of people living in poverty, but instead show a true and accurate account of the ways in which people live. This means we show people as empowered, dignified human beings.
- We acknowledge people are survivors, not victims; they are active participants in work, in life and in bringing about change in their lives.
- Where possible, try to avoid images of staff, not of an Afghan heritage and visiting from Australia, formally addressing local people as this can reinforce perceptions of power imbalances.
- The people we interview, photograph or film have given their free, prior and informed consent for us to do so. Where a person is under 18, we require both their consent (if they are old enough to understand) and their parents' or guardians' consent.
- Informed consent is only granted in the person's own language.
- If people aren't clearly identifiable by their face or name, then in most instances you don't have to individually get informed consent from every person captured in the frame (or their parent or guardian).
- If filming or photographing on privately-owned or government-owned property, you are legally required to get consent from the owners or the relevant authority before you do so.

g. Governance/Management

Mahboba's Promise recognises that for programs to support our vision and mission, good governance principles need to be followed at all times by its Management Committee as it is the governing body of the organisation. This means that all management committee decisions will be: transparent, accountable, responsive,



equitable, inclusive, effective and efficient, participatory and follow the rule of law. The management committee's powers are outlined in the constitution.

g.1. Roles and Responsibilities

The Mahboba's Promise constitution, policies and procedures are in place to ensure that all involved in Mahboba's Promise are given clear instruction about their roles and responsibilities towards Mahboba's Promise and the organisation's work both in Australia and in Afghanistan. This includes the expectation that all individuals will strive to maintain a positive image of MP in the global community.

The management committee is specifically responsible for ensuring that Mahboba's Promise is operating with a clear long-term strategy that positively impacts the lives of our beneficiaries in Afghanistan. This involves monitoring and approving any policies, financial expenditure or development activity that Mahboba's Promise is seeking to undertake.

Management Committee

The management committee is made up of individuals who are supportive of MP's vision and mission. Individuals who hold a management position will do so because they have the relevant skills and qualifications that make them an appropriate candidate for their specific role. Mahboba's Promise ensures that efforts are made to promote equal opportunity and access for all when filling management positions.

Vision and Mission:



Vision: Our Vision is to provide a sustainable future within a secure environment for the disadvantaged and vulnerable people of Afghanistan and in particular for women, children and orphans.

Mission: Mahboba's Promise aims to provide effective, sustainable development aid to disadvantaged and vulnerable individuals and communities in Afghanistan through the provision of education, sanitation, primary health care, training and agriculture programs.

The management committee is responsible for promoting the vision and mission of Mahboba's Promise both within Australia and internationally. The committee is responsible for seeing that all individuals who are actively involved in supporting Mahboba's Promise understand its vision and mission. The management committee strives to make certain that all work that the organisation undertakes is focused on achieving the stated vision and mission. Short-term and long-term strategies for promoting the vision and mission of Mahboba's Promise are determined by the management committee and shared with stakeholders, staff and volunteers.

Risk management:

The management committee is responsible for ensuring Mahboba's Promise effectively manages any risks that may present themselves during and as a result of the organisation's activities. The management committee recognises that risks can present themselves in a vast array of development activities and can be classified in a number of categories. The management committee is charged with making the final decision on development work and it is expected that they will follow the risk management policy and procedures to ensure that risks are prevented or mitigated.



All steps taken in the risk management process are determined by Mahboba's Promise Risk Management Policy.

Organisational Performance:

The management committee strives to evaluate the effectiveness and the outcomes of Mahboba's Promise activities to understand the success and failures of projects. This is done through consultation with partners in Afghanistan and place heavy emphasis on the views of the targeted beneficiaries involved in Mahboba's Promise projects.

The management committee measures the performance of policies, systems and programs within Australia on a regular basis. The result of these assessments will be used as a basis for determining what changes to internal operations need to be made in order for the organisation to continue to progress.

Management Committee effectiveness:

All management committee meetings are planned and run in an efficient, appropriate and timely manner on a regular basis. Appropriate documentation of meetings is also a priority. Regular evaluation of the effectiveness of the management committee to hold the body accountable to members, volunteers and staff is undertaken. The management committee ensures that all appropriate information is shared with stakeholders to maintain transparency within the organisation. Should any management committee member leave their position, the committee will ensure that an appropriate replacement is found in a timely manner.

Integrity and accountability:



It is recognised that Mahboba's Promise and all those actively involved with the organisation are accountable to the people of Afghanistan in whose communities we operate in. There is also a strong need to Mahboba's Promise to remain accountable to all stakeholders. Appropriate information will be shared with stakeholders and supporters through monthly newsletters and through the Mahboba's Promise website.

The integrity of the organisation is maintained through effective communication and open, transparent evaluations of Mahboba's Promise work in regards to the principles, vision and mission that drives our operations.

Organisation building:

The management committee ensures that all efforts are made individually and as a group to allow for the positive development of Mahboba's Promise as an organisation. This is done through guiding policy and program design, assisting in the capacity development of staff and volunteers and sharing their knowledge skills and experience with all involved in Mahboba's Promise. The management committee determines whether the organisation has any 'skill gaps' and aims to reduce these through appropriate guidance, mentoring and training.

Culture and Ethics:

The management committee is responsible for ensuring that Mahboba's Promise operates with a positive, professional, inclusive and supportive culture both internally and through its development work. All decisions by the committee are impartial and in



the best interest of the organisation. Mahboba's Promise's development work in Afghanistan is culturally sensitive and tailored to the current internal environment.

Engagement:

The management committee actively works to reach out to stakeholders and maintain open communication links. All appropriate information is communicated with stakeholders and a clear channel for discussion between the organisation and stakeholders is maintained via the Mahboba's Promise website and newsletter to ensure that all parties are informed about the organisation's progress. The annual report for Mahboba's Promise is also available to stakeholders to maintain transparency.

h. Resource management

Efficient and appropriate use of resources is an essential part of Mahboba's Promise's program management. We are committed to ensure that funds and other resources designated for the purpose of aid and development will be used only for those purposes.

h.1. Approach

Mahboba's Promise supports and is committed to abiding by the following principles:

 To ensure accurate representation of our activities to the people we work with, donor and the public; To ensure that funds raised for aid and development purposes are not used
to exploit people and communities who are vulnerable and do not place any
conditions or obligations on recipients in terms of non-development, religious
or political outcomes that would affect their access to services being offered.

Where there are components of partner programs which involve evangelical or partisan political activities, these will be promoted and accounted for separately.

Mahboba's Promise ensures that we and our partners can differentiate between development and non-development activity and communicate this appropriately stakeholders, donors and the public.

Control Procedures include:

Overarching

- Projects abide by MP standards for the procurement of goods and services (Ethical and Social Procurement Policy).
- Qualified and experienced staff for raising funds/resource mobilisation are in place.
- We monitor, control and manage their financial resources and risks of all projects.
- We provide annual reporting across our programs through our Annual Reports, and provide periodic programmatic (Finance Policy).

Projects and Programmes



- Appraisals by key members, management and stakeholders of all project proposals to determine whether they include non-aid and development components.
- Appraisers will record any issues, which must then be followed up to ensure that the policy requirements are satisfied before the project is approved.
- Appraisers record any aspects of the project that should be closely monitored over the life of the project to ensure compliance with this policy.
- Partner capacity assessment processes require the signatory to identify
 whether the partner is engaged in non-development activities, and if so, how it
 is able to manage and account for them separately to aid and development
 activity.
- Components of projects that represent non-development activity will be managed, reported and accounted for separately to aid and development components.
- In-country project monitoring will include monitoring of the separation of nondevelopment activities from development and humanitarian activities as part of project monitoring, learning and evaluation processes.

Communications and Advocacy Materials

- Guidelines are in place that address appropriate reporting in organisational promotional materials.
- All articles written by overseas project partners or photos supplied by partners for reporting materials are reviewed for differentiation between development and humanitarian and non-development activities.
- Communications materials are reviewed prior to publication to ensure separation of reporting and fundraising for development and humanitarian and non-development activities.

Fundraising and Provision of Choice for Donors

- Fundraising materials will be reviewed prior to publication to ensure that solicitations make a clear distinction between aid and development and nondevelopment activities.
- Where fundraising solicitations include references to both development and humanitarian and non-development activities, they will be reviewed to ensure that donors are provided with the choice of contributing to aid and development activity only.
- Funds raised non-development activity will be tracked, managed, reported and accounted for separately to those raised for development and humanitarian components.
- Communication with new partners will state the Member's position on support for non- development activity.
- Member's partners will receive a copy of this policy;
- The partner agreement Memorandum of Understanding (MoU) or equivalent will include clear definitions of development and humanitarian activity and nondevelopment activity.
- The partner agreement (MoU or equivalent) will require the partner to agree that the
- Members funds designated for development and humanitarian purposes will not be used to fund any non-development activity.
- Ongoing dialogue between the Member and its partners will reinforce the
 definitions of development and humanitarian and non-development activity and
 the need for a separation between development and humanitarian and nondevelopment activity.

i. People and culture

We recognise that our people are the most important part of our work and our programs' success. We are committed to treating all staff, volunteers and partners fairly, safely and with dignity.

i.1. Approach



Across our work we must ensure staff, volunteers and contracted support:

- Work in a safe environment, free from risks to their physical or emotional wellbeing – including bullying, harassment and abuse.
- Have description of roles and performance expectations.
- Are aware of their chain of supervision, and who they can discuss project or personal issues with.
- Are informed of any performance issues and grievances and have a performance management approach developed and approved by their supervisor.
- Are provided professional development opportunities for staff and key volunteers.
- Are aware of all MP policies, applicable procedures and reporting processes.
- Can make complaints and report wrongdoing through fair, transparent and accessible procedures.
- Must comply with human resource regulatory requirements and legislation.



| Document Control | | | |
|-----------------------|------------------------------------|--|--|
| Risk Level: | Very High (one year) | | |
| Approval Date: | Operationally approved: 09/05/2023 | | |
| Next Review Date: | 09/05/2023 | | |
| Responsible Position: | Operations Manager | | |