

Appel à candidatures- Due Diligence Côte d'Ivoire

RFP n#: 2024-4-PR-RCIDUEDILIGENCE

Localisation : Côte d'Ivoire

Date de démarrage : 01/06/2024

Date de fin : 30/08/2024

Contact à Better Cotton :
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Global Programme Team



Toutes les applications doivent être soumises via [ce formulaire](#).

Vous pouvez soumettre vos questions à tender@bettercotton.org avec RFP 2024-4-PR-RCIDUEDILIGENCE en objet de votre email, jusqu'au 15 Mai 2024.

Toutes les questions, demandes et propositions envoyés après la date limite de candidature (15 mai 2024) ne seront prises en compte que dans des circonstances exceptionnelles.

Description

Better Cotton est le plus grand programme de production de coton durable au monde. Notre mission : aider les communautés de coton à survivre et à prospérer, tout en protégeant et en restaurant l'environnement. Grâce à notre réseau de partenaires dans les pays producteurs, nous avons formé plus de 2,5 millions d'agriculteurs dans 23 pays à des pratiques agricoles durables. Un quart du coton mondial est désormais cultivé selon la norme Better Cotton. Nous avons réuni les parties prenantes du secteur autour de notre initiative et, d'ici 2030, notre objectif est de former 5 millions d'agriculteurs et de doubler la production mondiale de Better Cotton.

Contexte

L'objectif principale de Better Cotton est de réduire l'impact environnemental de la production de coton et d'améliorer les moyens de subsistance des producteurs de coton grâce à la production de Better Cotton. Pour parvenir à ces objectifs, Better Cotton coordonne des programmes de renforcement des capacités, mis en œuvre par des partenaires expérimentés sur le terrain, les Partenaires de Programme (PPs). Ces partenaires aident les agriculteurs à adopter des pratiques conformes au système de normes Better Cotton (BCSS – Better Cotton Standard System).

La crédibilité du BCSS repose donc, en partie, sur la capacité de Better Cotton à sélectionner et à travailler avec des partenaires compétents dans les pays producteurs.

La Due Diligence a pour objectif de réduire les risques partenariaux pour Better Cotton et également de soutenir les PP en mettant en œuvre un plan d'amélioration pour leur permettre de se conformer aux exigences de Better Cotton, de renforcer leur organisation et de garantir un partenariat à long terme.

Qu'est-ce qu'une Due Diligence pour Better Cotton ?

La Due Diligence est un processus continu, proactif et réactif par lequel les PP peuvent identifier, prévenir, atténuer et rendre compte de la manière dont ils traitent et intègrent certains facteurs dans leur système de prise de décision et de gestion des risques.

L'objectif de la Due Diligence est de s'assurer que les PP ont mis en place des structures de gouvernance, des politiques et des systèmes de gestion adaptés. La Due Diligence peut également aider les PP à s'assurer qu'elles respectent le droit international et national.

Le cadre de Due Diligence mis en œuvre par Better Cotton couvre six thématiques : l'éthique, la gouvernance, les Ressources Humaines, l'environnement et les opérations, la stabilité financière et la gouvernance, et le cas échéant - les partenaires locaux.

La Due Diligence s'articule autour des points suivants

- L'évaluation du PP et de ses engagements pour identifier les conditions dans lesquelles l'entreprise opère ses activités.
- L'identification et l'évaluation de tous les risques réels ou potentiels en évaluant les conditions de gestions réelles de l'PP par rapport aux normes en places.
- La prévention ou l'atténuation des risques identifiés en appuyant la mise en œuvre d'un plan d'atténuation des risques.

Objectif de la mission

L'objectif de la mission est de mener le processus de Due Diligence en Côte d'Ivoire avec quatre (4) partenaires, conformément au cadre de Due Diligence de Better Cotton.

En lien direct avec les partenaires, le(s) consultant(s) sera (seront) responsable (s) de la mise en œuvre de l'ensemble du processus de Due Diligence avec l'appui des équipes de Better Cotton.

Approche et Méthodologie

Un membre de l'équipe Better Cotton basé en Côte d'Ivoire appuiera le(s) consultant(s) dans la mise en œuvre de la Due Diligence et la coordination du travail avec les PP. D'autres membres de l'équipe apporteront également leur soutien. L'équipe Better Cotton sera donc composée :

- Des Responsables de programme, basé à Londres

- Du Coordinateur de programme, basé à Genève
- Du Coordinateur régional, basé à Ouagadougou au Burkina Faso
- Du représentant de Better Cotton en Côte d'Ivoire

Better Cotton fournira au consultant tous les supports méthodologiques à suivre pour la mise en œuvre de la Due Diligence :

- Le guide de mise en œuvre d'une Due Diligence (Voir Annexe 1)
- Le modèle de présentation pour la session de lancement avec le PP
- Le questionnaire à soumettre au PP
- Le cadre d'analyse de Due Diligence
- Le modèle de rapport final
- Le modèle pour le bilan de santé financière

Pour mener à bien la Due Diligence, le consultant devra suivre les principales étapes suivantes :

1. En coordination avec l'équipe de Better Cotton : préparer la mission, créer une feuille de route, identifier les contacts de Better Cotton et du PP et définir les rôles, préparer la réunion de lancement, préparer les dossiers partagés.
2. En coordination avec l'équipe de Better Cotton, animer la réunion de lancement avec le PP
3. Aider le PP à remplir le questionnaire de Due Diligence : Organiser des réunions bihebdomadaires, revoir les réponses et analyser les documents fournis, commenter et exiger des éléments complémentaires ou des réponses plus précises de la part du PP, préparer un plan d'action correctif.
4. Faire le bilan de santé financière avec l'outil d'analyse Better Cotton.
5. En coordination avec l'équipe Better Cotton, valider les réponses du PP et noter les risques associés avec l'outil Better Cotton.
6. En coordination avec l'équipe Better Cotton, organiser des visites terrain et des rencontres avec les staff de chaque partenaires afin de mesurer la mise en œuvre des politiques internes. Ces rencontres seront aussi l'occasion de collecter des informations complémentaires, qui n'auront pas pu être collectée au préalable, pour permettre une Due Diligence cohérente et représentative de la situation du partenaire. Ces visites et rencontres se dérouleront sur 2-3 jours pour chaque partenaire en fonction des besoins.
7. Compléter le rapport final de Due Diligence
8. Organiser une réunion finale avec le PP pour examiner les résultats de la Due Diligence et convenir du plan d'atténuation des risques.

Afin de procéder à ces tâches, une estimation du temps nécessaire à la conduite d'une Due Diligence est proposée :

| | S1 | S2 | S3 | S4 | S5 | S6 | Jours ouvrés | Commentaires |
|--|----|----|----|----|----|---------------|--------------|---|
| Phase préparatoire: Prise en main des outils Better Cotton | 1 | | | | | | 1 | 1 jours commun à toutes les Due Diligence |
| Mise en oeuvre de questionnaire: - Réunion bi-hebdomadaire - Retours et commentaires auprès de l'IP - Coordination avec l'équipe de Better Cotton - Validation des réponses de l'IP - Compléter l'outil de Due Diligence | | 3 | 2 | 2 | | | 7 | 12 jours ouvrés pour 1 PP |
| Developpement du plan d'atténuation des risques: - Détailler les attentes de Better Cotton - Evaluation du plan - Commentaires auprès de l'IP | | | | | 2 | 1 | 3 | |
| Vérification des données financière: Consolider les données financières, les analyser et établir le rapport | | | | | 1 | | 1 | |
| Rapport final et réunion finale | | | | | | 1 | 1 | |
| | | | | | | TOTAL: | 13 | |

Livrables

- i. Présentation lors de la réunion de lancement.
- ii. Le cadre d'analyse revue et mis à jour au fil de l'eau.
- iii. Le rapport d'analyse des données financières
- iv. Le rapport final, incluant le plan d'atténuation des risques

Calendrier

| | |
|--------------------|------------------------------------|
| 15 mai | Clôture du dépôt des candidatures. |
| 16-22 mai | Evaluation des candidatures |
| 23 – 29 mai | Entretiens |
| 1er juin | Signature du contrat |

Compétences requises et Experiences

| Experience |
|---|
| <ul style="list-style-type: none"> • Forte expérience en rédaction, déploiement, révision ou mise en œuvre de Due Diligence dans le secteur du développement ou du secteur privé. • Forte expérience en analyse financière. • Expérience professionnelle dans des organisations internationales • Forte expérience en Côte d'Ivoire |

Compétences

- Forte expertise financière
- Solides compétences analytiques notamment dans les domaines suivants : éthique, gouvernance, RH, environnement et opérations, stabilité financière et gouvernance.
- Bon communicant
 - Maîtrise de la rédaction de rapport et de présentation power point
 - Maîtrise de l'anglais lu et écrit au minimum. Les supports et la méthodologie sont en Anglais.

Documents nécessaires

Les candidats intéressés sont invités à envoyer les documents suivants :

- Un ou plusieurs CV
- Une offre financière détaillée
- Une liste de références
- Une courte proposition technique composée de :
 - Un calendrier de mise en œuvre
 - Une description de 1500 mots maximum de l'approche globale qui sera utilisée dans laquelle figurera notamment :
 - La compréhension des enjeux de la mission,
 - L'engagement du partenaire dans cet exercice et la manière de surmonter les réticences de PP à partager certaines informations et à coopérer (NB. Le consultant mettra en œuvre la méthodologie Better Cotton et utilisera les outils Better Cotton).

Les propositions seront évaluées sur la base de la qualité et de la clarté de l'approche proposée, de l'expertise et de l'expérience pertinentes du ou des membres de l'équipe, de l'alignement sur les critères définis dans les TDR et du rapport qualité-prix global.

Nous remercions tous les candidats de leur intérêt, mais seuls les candidats présélectionnés seront contactés.

Better Cotton s'engage à respecter les bonnes pratiques et la transparence dans la gestion des ressources naturelles, humaines et financières. Toutes les candidatures seront examinées selon les principes et politiques de Better Cotton en matière d'égalité des chances, de non-discrimination, d'anti-corruption et de conflits d'intérêts.

Annex 1 : Due Diligence Handbook

HANDBOOK

HOW TO UNDERTAKE AN ENHANCED BCI IMPLEMENTING PARTNER DUE DILIGENCE

21 JUNE 2021



Source: Alliance For Science, Cornell University

BCI REF: 2020-11-IMP-DUE DILIGENCE

1. Enhanced IP DD Operational Handbook

1. Introduction

The enhanced Implementing Partner (IP) Due Diligence (DD) framework provides a system for BCI to enhance its existing processes to enable credible selection of Implementing Partners (IPs), and conduct retrospective DDs on existing IPs. The DD framework provides for a robust system for conducting a DD, analysing risk and developing related corrective risk action plans.

2. What is a due diligence process and its purpose?

Due diligence is an on-going, proactive, and reactive process through which companies/organisations can identify, prevent, mitigate, and account for how they address actual and potential adverse impacts as an integral part of business decision-making and risk management systems.

The purpose of the Due Diligence processes is to help Better Cotton to ensure that the IPs we work with, or fund, have adequate governance structures, policies, and operational systems in place. These processes can also help organisations ensure they observe both international and domestic law and build towards the requirements of corporate Due Diligence.

3. In practice, how is a due diligence process structured and accomplished?

The nature and extent of due diligence actions that are appropriate will depend on individual IP circumstances and can be affected by factors such as the size of the IP, the location of the activities, and the situation in a particular country such as political and socioeconomic environment, the sector and nature of the products or services involved, and in BCI's case an additional layer with regards to downstream local partners.

Due diligence is thus structured around the steps that companies/organisations should take to:

1. Assess the business and its undertakings to identify the factual circumstances (reality) under which the business is operating.
2. **Identify and assess any actual or potential risks** by evaluating the factual circumstances against recognised standards.
3. **Prevent or mitigate the identified risks** by adopting and implementing a corrective risk action plan.

4. Implementing a risk-based approach to conducting the DD

The BCI enhanced IP DD framework has been structured to enable BCI to implement a risk-based approach to performing an adequate due diligence. Activities associated with higher risks will require more intensive due-diligence and monitoring activities. The framework is designed to capture and understand these risks and rate them according to specific risk guidance (High risk; Medium risk; Low risk), detailed below.

Ongoing process: Importantly, DD is an ongoing process of gradual improvements. BCI should encourage change by constructively engaging IPs, and supporting them to build better organisations.

Encouraging good faith efforts: It is key for BCI to encourage IPs into making good faith efforts, that is that BCI should anticipate to take reasonable steps and make good faith efforts to carry out DD with its IPs - meaning that the IPs should be encouraged to participate actively, openly share all information (whether positive or negative) and communicate where clarity or additional support is required.

It is important for BCI to proactively engage with the IP and its management, provide transparent and clear guidance regarding the process and maintain open communication channels.

It's unrealistic to expect IPs to achieve full compliance with the guidance overnight.

Mitigate risks but don't embargo high-risk areas: The enhanced IP DD framework is designed to help BCI work with its IPs in a responsible way. Except in the most harmful and high risk circumstances, BCI should leverage its relationships with IPs to improve business conduct and conditions in respective IP countries and in the field.

5. Risks areas covered enhanced IP DD framework

The DD has been developed to help BCI identify whether their IPs pose any risks and prioritise the most severe risks associated with sourcing cotton from its IPs, ensuring that any risks are identified are mitigated. The key focus areas of the enhanced IP DD framework are detailed in figure 1 below.

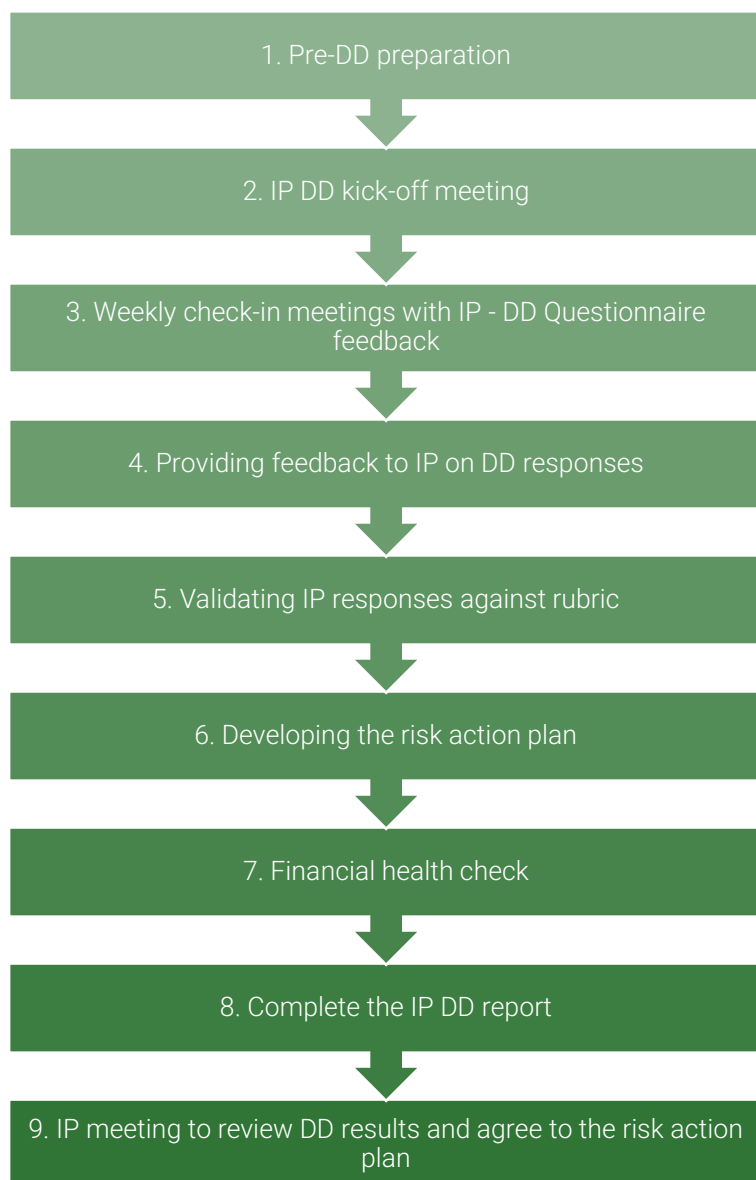
Figure 1: DD areas covered in the framework



The BCI enhanced IP DD nine-step process

The nine-step, risk-based due diligence process is relevant to all BCI IPs operating in the cotton supply chain and applies globally. The nine step process can be found in figure 2 below.

Figure 2: Nine-step BCI enhanced IP DD process



Each of the nine steps is broken down in detail below.

Step 1: Pre-DD

The pre-DD process is critical for delineating roles and responsibilities within BCI and establishing the framework for conducting an effective DD with the IP. The BCI HQ IP DD coordinator must be proactive in engaging with the country team to ensure that an appropriate DD roadmap is prepared and that all BCI team members are aware of the implementation plan and fully invested in its successful delivery. Key steps are outlined below in figure 3.

Figure 3: Key steps to be taken pre-DD

1. Identify BCI HQ staff member responsible for coordinating the DD

2. Key roles of BCI DD Coordinator

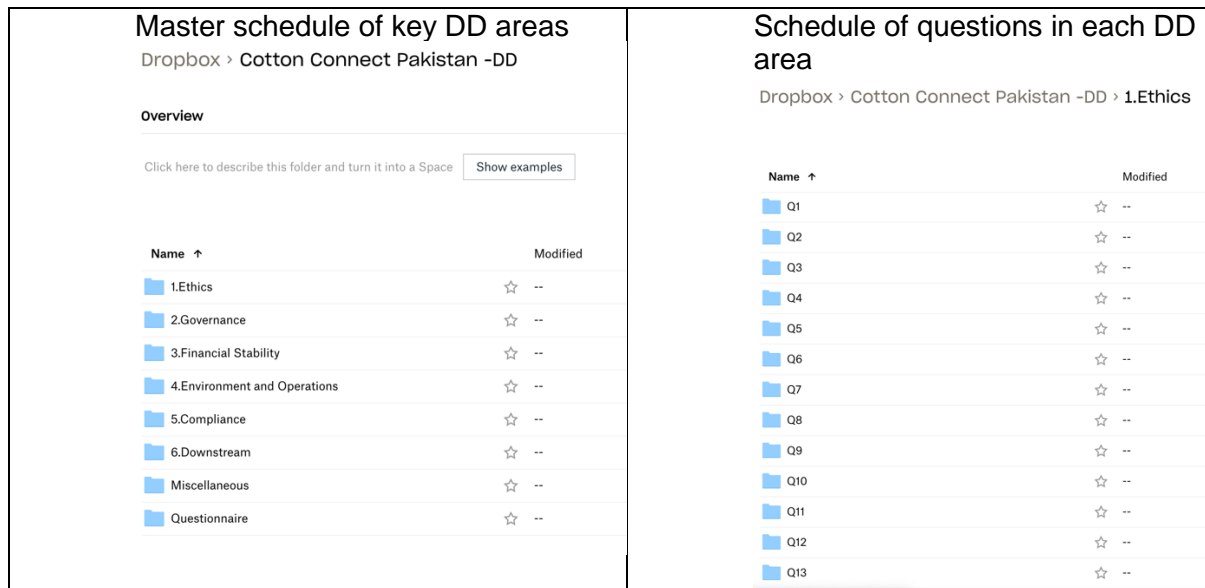
- Create roadmap for DD process from start to finish
 - Frequency of meetings
 - Deadlines for receiving information updates from IP
 - Deadline for completing DD Questionnaire
- Support and guide BCI Country DD IP Manager throughout DD process
- Lead weekly follow-up calls with IP and BCI
- Responsible for providing feedback and answering IP questions to ensure DD is completed correctly and on time
- Engaging with IP Senior Management as and where required

3. Identify BCI IP DD Manager from BCI Country Team to serve as primary contact with IP for purposes of completing DD

4. Key roles of BCI Country DD IP Manager

- Managing the IP relationship
- Managing and handholding the IP through the DD process, translating as needed
- Setting up dropbox folders for the IP and ensuring content uploaded as required - see example below in Figure 4
- Managing timelines and expectations around completion of DD and sharing information in a timely manner
- Facilitating weekly follow-up calls between IP and BCI
- Early-stage warning to BCI HQ IP DD coordinator and IP CEO/Senior management on any concerns arising

Figure 4: Example of dropbox structure



Tip 1: Critical that BCI Country Team – Country Director and BCI IP DD Manager are engaged and fully understanding of their role within the DD process in advance of kick-off meeting.

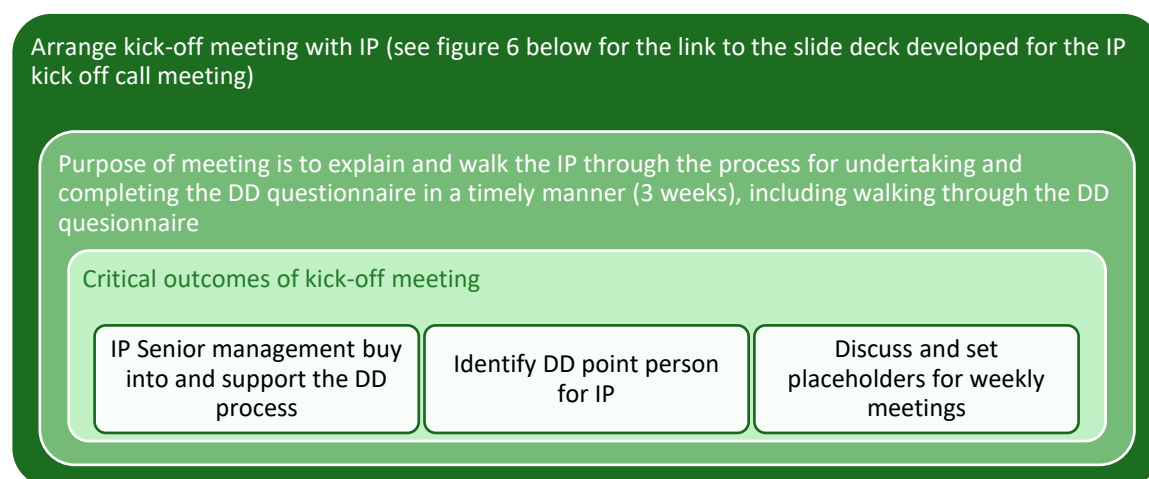
Training will be very important.

BCI HQ handholding during the first couple of DD's will be key.

Step 2: Enhanced IP DD kick-off meeting

The enhanced IP DD kick-off meeting is the most important step of the DD process as it sets the tone for the DD with the IP and should clearly outline to the IP the roadmap for conducting the DD, and BCI's expectations of the IP throughout this process to ensure that it runs smoothly. It is important that both BCI and the IP have appropriate management representation during the enhanced IP DD Kick-off meeting. See figure 5 below for overview, and figure 6 for snapshot of the enhanced IP DD kick-off meeting presentation.

Figure 5: Purpose and outcomes of kick-off meeting



Tip 2: It is important to ensure that senior management, CEO, Director is present at this meeting to ensure buy and support for the DD process

Figure 6: Slide deck for guiding IP kick of call meeting

[file:///users/siobhanfranklin/Dropbox \(Personal\)/FRANK !T LIMITED/Frank Impact/BCI/BCI IP DD management/Final reports/guidance doc/file](file:///users/siobhanfranklin/Dropbox%20(Personal)/FRANK%20IT%20LIMITED/Frank%20Impact/BCI/BCI%20IP%20DD%20management/Final%20reports/guidance%20doc/file)



Enhanced Implementing Partner (IP) Due Diligence (DD) Process

Enhanced DD kick off session with [Name of IP]
[Country of IP]
[Day] [Month] [Year]

Enhanced IP DD kick off session with [name of IP]

08/06/2021

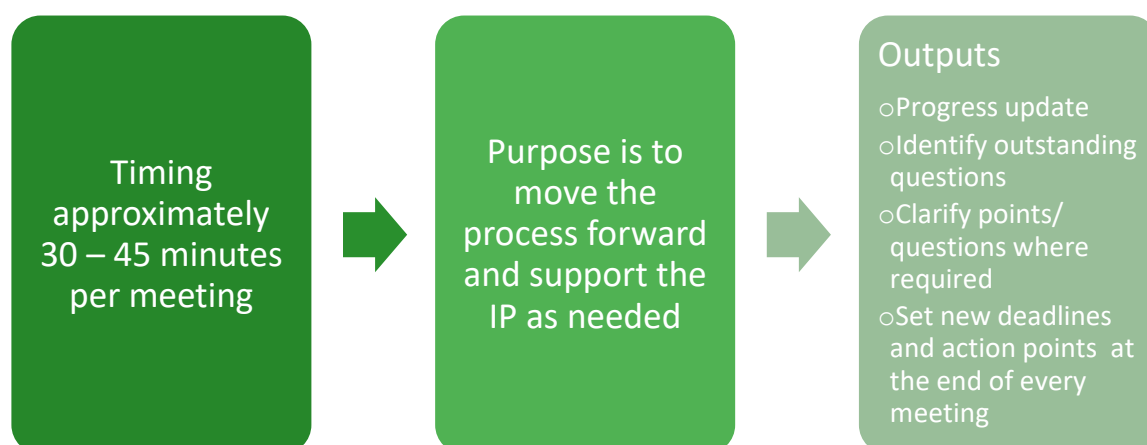
1

At the end of the kick off meeting, BCI country team will share the questionnaire with the IP's team. The excel file to be considered is : **IP DD Questionnaire - for sharing with IP**

Step 3: Weekly check in meetings – DD questionnaire feedback

Weekly check in meetings provide an opportunity to gauge the progress of the IP, provide feedback on the process and to support the IP with specific questions/issues that they are having. During these meetings the BCI Country IP DD Manager must remain focused on moving the process forward and holding the IP DD point person accountable to deliver in accordance with the agreed upon timelines, as well as being aware of any possible red flags that could inhibit the successful completion of the DD questionnaire. Details of timing, purpose and outputs is detailed below.

Figure 7: Timing, purpose, expected outputs of the weekly check in meetings



Tip 3: The DD process needs to continually be moving forward. The goal of the weekly check-in meetings is to discuss “new” information with the IP. Prior to each meeting the BCI Country IP

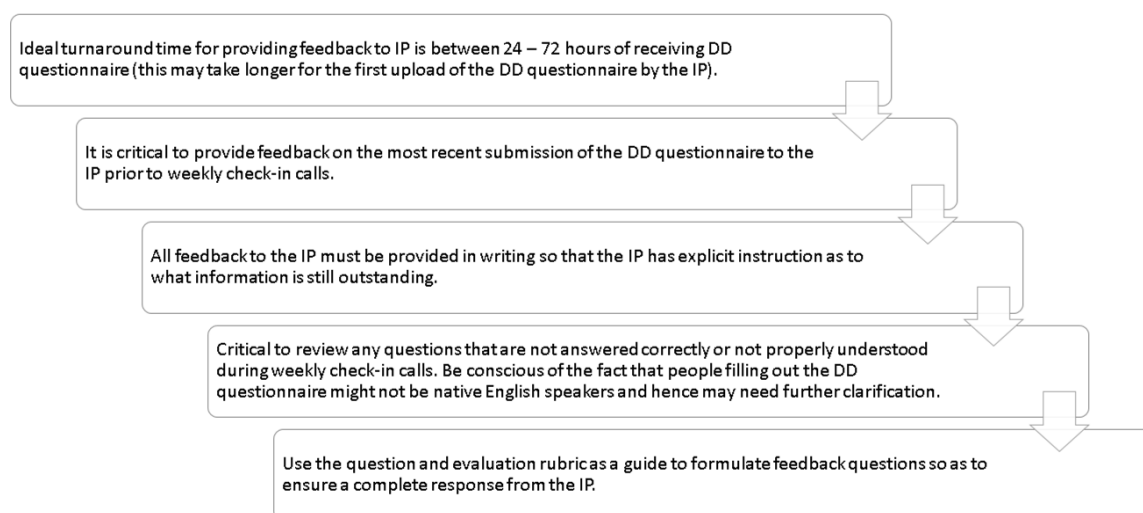
DD Manager should review questions completed by the IP at that juncture and prepare feedback to share with the IP regarding the latest version of the DD questionnaire. The expectation should be that the DD questionnaire and dropbox folder is updated by the IP on an ongoing basis.

Tip 4: Engage the IP's senior management team if limited progress is being made on the DD questionnaire and uploading of documents to dropbox. This can be initiated after a two-weeks from kick off.

Step 4: Providing feedback to IP on DD responses

Providing clear and consistent feedback to the IP is critical to the successful completion of the DD questionnaire and it is the responsibility of the BCI Country IP DD Manager to ensure that BCI receives DD responses that comprehensively address the questions being asked. See figure 8 below for the feedback process on the DD questionnaire, and figure 9 for guidance on providing feedback to the IP on question responses. See Annex 1 for detailed process examples of how to manage ensuring the IP responds comprehensively to a DD question.

Figure 8: Process for providing feedback to the IP on the DD questionnaire



BCI feedback will be clearly formulated in the dedicated column of the excel file: **IP DD Questionnaire - for sharing with IP**

Figure 9: Guidance on providing feedback to the IP on question responses

| Providing feedback on question responses | Specific IP responses to questions |
|--|--|
| <ul style="list-style-type: none">● Assess whether question has been answered completely<ul style="list-style-type: none">○ All information requested in the question provided○ All required attachments requested have been provided● Request clarity where<ul style="list-style-type: none">○ Response is unclear○ Require additional information/details | <ul style="list-style-type: none">● Always best to get IP to identify the specific piece of information that is being referenced● For example – if given an HR Manual, but are looking for code of conduct have the IP identify the section, page, article that they are referring to otherwise spend a lot of time trying to guess what is being referred to |

Tip 5: Clear feedback must be provided by the BCI Country DD IP Manager in order to receive complete DD responses from the IP.

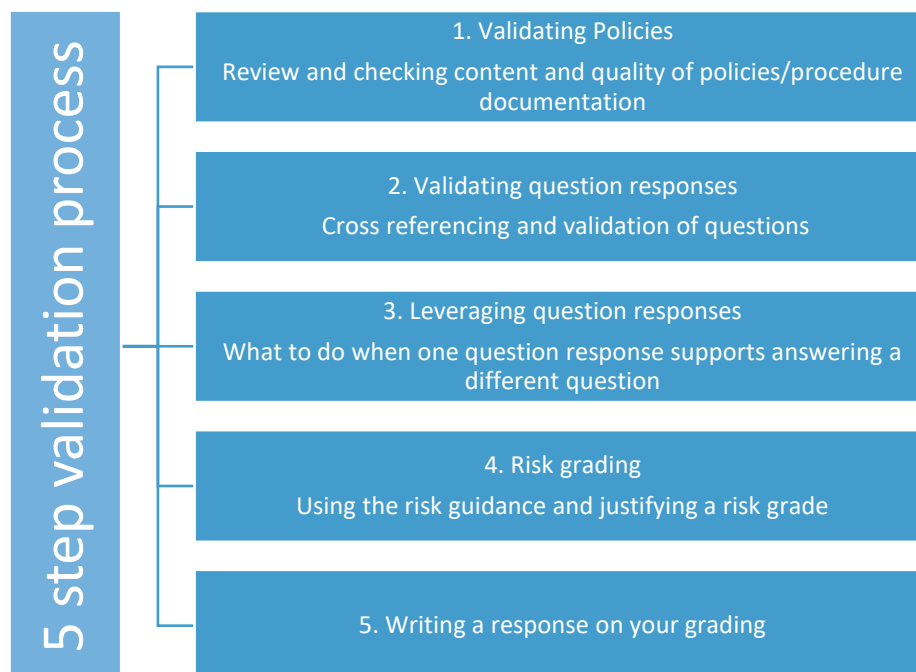
Tip 6: Questions that are clearly not understood or that are being answered incorrectly need to be escalated to senior management.

Step 5: Validating IP responses against rubric

Please refer to excel file : **Final Validation and Reporting Rubric - Internal Use** , Tab: **Validation & Risk Rubric**

Validating IP responses against the evaluation rubric is an objective process that measures the risk level of the IP as per DD questionnaire. Prior to validating any question, the BCI DD Coordinator should assess the quality of the question and determine that the information provided by the IP is sufficient to consider the question complete. Below is an outline of the five step validation process to be followed, see figure 10 below. See Annex 1 for detailed examples of how to validate an enhanced IP DD question response.

Figure 10: Five step validation process



Tip 7: Be objective and fact-based when validating a response.

Tip 8: It's important to check the quality and content of the policies and documents uploaded by the IP to dropbox to ensure that they cover the adequately address the question to which they relate.



Five step validation process

| 1. Validating Policies Review and checking content and quality of policies/procedure documentation | | |
|--|---|---|
| Scope of policy is defined oWhat does the policy cover? oMake sure specific terms are defined (example – child labour, bribery, etc.) oExamples | Clear actions to operationalise the policy are in place oProcesses and procedures are outlined oReporting mechanisms in place | Accountability oReporting mechanisms oDisciplinary actions for breach oPerson(s) responsible |

| 2. Validating question responses Cross referencing and validation of questions | | |
|---|--|--|
| When validating you can use information/documentation that has been provided to answer other questions | If information is available to support the justification for the grade provided for a particular answer then it is best to use it and make reference to it | Remember that BCI is only asking the IP for a specific type of information to answer a question, but if more information can be used from other DD responses to demonstrate commitment/reduction in risk level, etc. then supportive |

| 3. Leveraging question responses - What to do when one question response supports answering a different question | | |
|---|---|---|
| Not every organisation will have every policy as per the DD. However they may have another policy document that covers the subject matter of the requested policy. | For example, an organisation may have another document that covers the subject matter, e.g. child labour policy, but instead has a safeguarding policy, which accounts for child labour issues. It is important to note that not having a child labour policy does not automatically mean that the IP poses any actual risk. | Using the previous example, based on the quality of the safeguarding policy it might be sufficient to state that the risk level is negligible |

| 4. Risk grading - using the risk guidance and justifying a risk grade | |
|---|---|
| Review response and associated attachments | Review risk guidance notes for high, medium, low risk grade allocation Apply score 1,2,3 accordingly |

| 5. Writing a response on your grading | |
|---|---|
| Use of language very important Needs to be objective, fact-based | Not definitive per se – for example, don't say no risk, it's important to preface by saying based on the information provided, or there is sufficient evidence to suggest. It's key to provide written justification for the risk score. |



Figure 11: Risk guidance for providing a risk score: [update once finalised by BCI]

| BCI Implementing Partner - Scoring Rubric | | | GUIDANCE TO BCI STAFF FOR REVIEWING THE QUESTIONNAIRE FOR RISK EVALUATION | | |
|---|------------|---|--|---|---|
| Question Number | Focus Area | Question [TO BE REVIEWED WITH BCI HQ AND FURTHER EDITED] | RED RISKS = APPLY SCORE OF 3 | AMBER RISKS = APPLY SCORE OF 2 | GREEN RISKS = APPLY SCORE OF 1 |
| 1 | Ethics | 1. Corruption risk issues and compliance 1a. How are corruption risk issues and compliance managed by the Company/Organisation? [Provide detail]. 1b. Who in the Company/Organisation is responsible for corruption risk issues and compliance? Please share the name(s), position, seniority, and training in risk management, compliance, and anti-bribery matters? [Provide Details] <u>Required attachments</u> o Risk manager CV o Anti-bribery and corruption policy o Whistle-blower policy o Conflicts of interest policy o Anti-money laundering policy o Know Your Customer policy | Risk level: Tolerant internal culture of corruption, coming from board and/or senior executives. Look for: Lack of senior leader designated to deal with corruption issues; signs the organisation does not take corruption seriously; structural weaknesses to manage corruption risk. None of the listed policy documents are available. | Risk level: Corruption taken seriously, but gaps in systems, capacity or implementation Look for: Individual(s) responsible for corruption issues have capacity issues, such as inadequate training or sufficient professional experience One or more of the listed policy documents are not available. Gaps in detail within listed policy documentation - i.e. documents do not comprehensively cover risk area. | Risk level: Corruption taken seriously, no gaps in systems, capacity or implementation Look for: Highly competent and high capacity anti-corruption management. Look for: Policy documents fully available, and comprehensively cover risk areas. |

Figure 12: Written justification for risk score

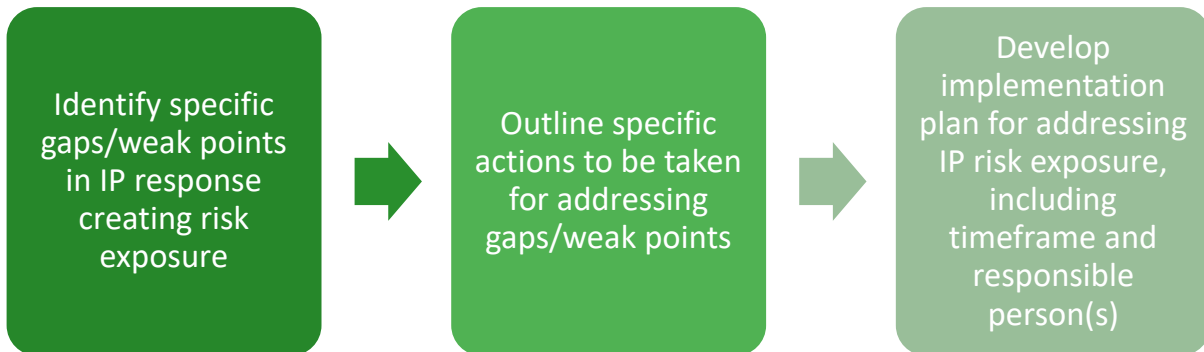
| BCI Implementing Partner - Scoring Rubric | | RESPONSE EVALUATION | RISK MANAGEMENT | | | | | | |
|---|------------|---------------------|---|--------------------|-----------------|----------------------------|-------------------------------------|-----------------------|-----------------------|
| Question Number | Focus Area | RISK SCORES | JUSTIFICATION FOR SCORE AND EVIDENCE (INTERVIEWS / DOCUMENTS) | CORRECTIVE ACTIONS | OTHER - DETAILS | CORRECTIVE ACTION TIMELINE | BCI MONITORING OF CORRECTIVE ACTION | IP PERSON RESPONSIBLE | IP PERSON RESPONSIBLE |
| 1 | Ethics | Score dropdown | [Insert text] | Use dropdown menu | [Insert Text] | Use dropdown menu | [Insert Text] | [Insert name] | [Insert name] |
| 2 | Ethics | | [Insert text] | Use dropdown menu | [Insert Text] | Use dropdown menu | [Insert Text] | | [Insert name] |

Step 6: Developing the corrective risk action plan

Please refer to excel file : **Final Validation and Reporting Rubric - Internal Use** , Tab: **Corrective risk action plan**

To support the IP in addressing any potential areas of risk exposure identified because of the DD process it is crucial that the BCI Country DD IP manager develops a corrective risk action plan that provides effective guidance on how to address any gaps or weak points within the IP's organisational structures, operational systems and policies. See below for steps to developing the corrective risk action plan.

Figure 13: Steps to developing the corrective risk action plan



Tip 9: The corrective risk action plan should be realistic and practical to implement for the IP based on the type of organisation, activities they carry out and environment in which they operate.

See figure 11 and 12 above for snapshot of the risk guidance and corrective risk action plan as per the DD framework – Validation and Corrective Action Plan Rubric Tab 3.

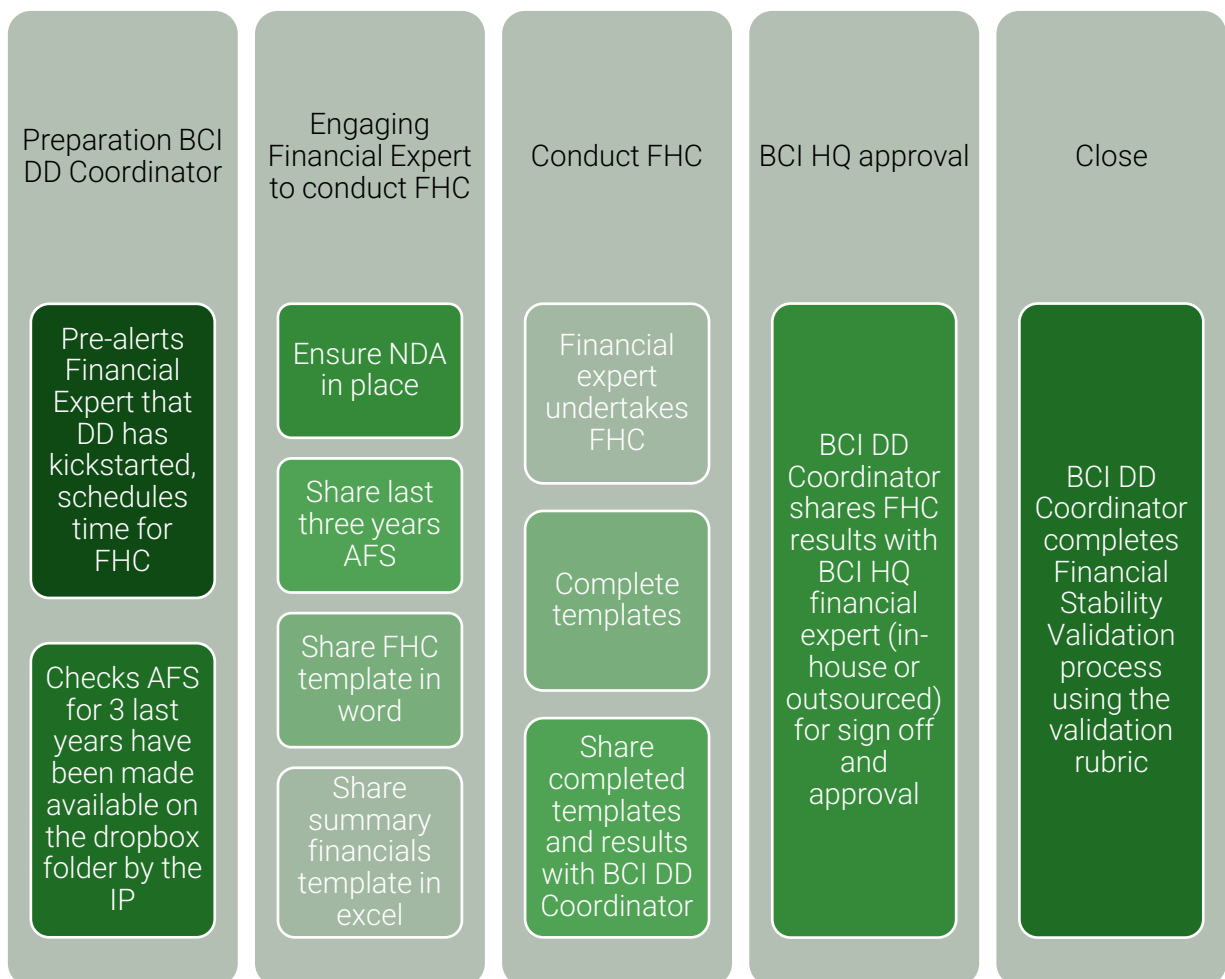
Step 7: Financial health check on IPs Audited Financial Statements

The aim of undertaking a financial health check (FHC) on the IPs audited financial statements (AFS) for the last three years is to conduct a review of the AFS in the three areas outlined in figure 14 below. The FHC should be undertaken by a qualified financial expert engaged either centrally by BCI HQ (allows for consistency) or by the BCI Country Office (de-centralised approach) through the BCI Country IP DD Manager. The process for undertaking the financial health check is outlined in figure 15 below; and a link to and overview of the financial health check template can be found in figure 16 below.

Figure 14: Three areas of review of the financial health check of the IPs Audited Financial Statements

| THE QUALITY OF THE FINANCIALS | THE FINANCIAL PERFORMANCE OF THE ENTITY | THE ABILITY OF THE ENTITY TO CONTINUE AS A GOING CONCERN |
|--|--|--|
| <ul style="list-style-type: none"> - Type of financials reviewed: The reviewer must consider the types of financials reviewed - The standard of financials reviewed: The reviewer must consider the quality of the statements i.e., are they up to standard or can be linked to an adequately mapped accounting system. - Quality of the notes and the support information provided: The reviewer must consider if the notes provide sufficient support information. | <ul style="list-style-type: none"> - Income generation: The reviewer must consider the businesses income generating ability over the period. - Cost Controls: The reviewer must consider the businesses cost controlling ability over the period - can provide insights into effective cost allocation. - Appropriateness of expenditure: The reviewer must consider if the businesses expenditure on assets or remuneration is appropriate. | <ul style="list-style-type: none"> - Ability to meet short-term commitments i.e., over the next 12 months - Reserves and access to funding |

Figure 15: Process for undertaking a financial health check (FHC) on an IPs Audited Financial Statements (AFS)



Tip 10: BCI IP DD coordinator to ensure placeholder booking of the financial expert's time in advance of FHC review so to avoid unnecessary delays. Ideally this should be done as soon as the IP DD kick off meeting has been closed.

Tip 11: Request for AFS to be uploaded to the dropbox as a priority at the kick off call and first weekly check in meeting, and share with financial expert soon as they are available.

Figure 16: Financial Health Check Template

Template in Excel: Two tabs – FHC report; Summary AFS

| IP Name | Score of IP |
|---|-------------|
| Enhanced IP DD | |
| Review of IP Audited Financial Statements | |
| Date | |
| Address Financial Statements Reviewed | |
| Reviewed (appointed by BCI) | |
| Reviewed (BCI HQ) | |
| Reviewed by BCI HQ | |

| Area of review | Max Score | IP Score |
|---|-----------|----------|
| 1. The knowledge performance of the entity | 15 | |
| 2. The extent to which the review is based on a work system | 35 | |
| Total Score | 50 | |

| The quality of the financials reviewed | Max Score | IP Score |
|---|-----------|----------|
| 1. The quality of the financials reviewed | 10 | |
| 2. The quality of the financials reviewed | 5 | |
| 3. The quality of the financials reviewed | 5 | |
| Total Score | 20 | |

| Score guidance | Max Score | IP Score |
|--|-----------|----------|
| 1. Score guidance General overview: Reviewer must consider the business revenue generating activity over the period. 2 points: Our growth is rapid but not in line with the growth in the size of the normal business. 3 points: Considerable profitability but less than the growth in the size of the normal business. 4 points: No profitability at all, unless in a niche market. Goal Capture: The reviewer must consider the business cost controlling ability over the period - can provide insights into effective cost allocation. 1 point: Slightly overhead costs and costs rising in line with rising generation of a Gross Profit level. 2-3 points: Overhead costs rising in line with rising overhead and profitability ratios. 4 points: Costs rising faster than income increasing faster. Appropriateness of expenditure: The reviewer must consider if the business expenditure is justified or remunerative as appropriate. 3 points: For expenditure on income generating assets, staff and director remuneration in line with market, no budget concerns. 2.5 points: Inefficient expenditure on income generating assets (second-hand equipment that quickly needs to be replaced), staff and director remuneration not in line with market or high recruitment costs due to high staff turnover; some budget concerns. 2 points: For unusual non-core expenditure (e.g., exceeded on travel expenses relative to overall expenditure and business size and related activities), higher than normal director remuneration and consistent budget patterns. | 5 | |
| 2. Score guidance Ability to meet short-term commitments (i.e., over the next 12 months) 10 points: Current Assets exceed Current Liabilities by an adequate amount for such a business and the business has long standing good relationships with creditors and financiers. 5 points: Current Assets do not exceed Current Liabilities by an adequate amount for such a business, but the business has long standing good relationships with creditors and financiers. 0 points: Current Assets do not exceed Current Liabilities by an adequate amount for such a business and the business does not have long standing good relationships with creditors and financiers. | 10 | |
| 3. Score guidance Resilience and access to funding 5 points: Business has a strong income to servicing debt and clear future commitments from financiers with substantial resources (e.g., shareholders/stakeholders committed to the business or who view it as strategically important). 3 points: Business has an adequate income, some outstanding debt and unclear future commitments from financiers with substantial resources. 0 points: Business with declining or marginal income, unreasonable outstanding debt and no clear future commitments from financiers with substantial resources (e.g., shareholders/stakeholders committed to the business or who view it as strategically important). | 5 | |

| | 2017 | | 2018 | | 2019 | | 2020 | | |
|--|--------------|--------------|---------------|---------------|-------|------|------|------|------|
| | 04 | 03 | 04 | 03 | 04 | 03 | 04 | 03 | |
| Average Exchange Rate FC Exchange Rate | | | | | | | | | |
| Profit and Loss (INR) | | | | | | | | | |
| March | 2017 | 2018 | 2019 | 2020 | March | 2017 | 2018 | 2019 | 2020 |
| Sales | 70 962 930 | 81 824 346 | 105 971 730 | 133 932 323 | | | | | |
| Costs | (70 064 820) | (81 824 846) | (105 971 730) | (133 932 323) | | | | | |
| Gross profit | 898 110 | 0 | 0 | 0 | | | | | |
| Other profit | 1 000 | 1 000 | 1 000 | 1 000 | | | | | |
| Other income | 6 504 085 | 4 828 024 | 5 000 116 | 7 743 143 | | | | | |
| Program expenses | (2 592 982) | (6 830 022) | (8 123 375) | (10 819 268) | | | | | |
| Other expenses | (8 544 805) | (15 549 659) | (17 623 135) | (18 477 319) | | | | | |
| Over-heads | (7 859 947) | (8 874 652) | (10 744 350) | (12 048 222) | | | | | |
| BRTSA | 1 329 526 | 1 256 739 | 1 319 036 | 1 339 247 | | | | | |
| Expenses | (1 200 018) | (1 215 738) | (1 202 016) | (1 225 287) | | | | | |
| EAT | - | - | - | - | | | | | |
| Tax | - | - | - | - | | | | | |
| Profit/(loss) | - | - | - | - | | | | | |
| Net profit | - | - | - | - | | | | | |
| Cashflow (INR) | | | | | | | | | |
| March | 2017 | 2018 | 2019 | 2020 | March | 2017 | 2018 | 2019 | 2020 |
| Cash Flow Operations | 1 269 938 | 1 136 739 | 1 319 036 | 1 339 247 | | | | | |
| Working Capital Increase/(Decrease) | 2 668 938 | 1 136 739 | 1 319 036 | 1 339 247 | | | | | |
| Net Cash Flow from operations | 2 668 938 | 1 136 739 | 1 319 036 | 1 339 247 | | | | | |
| Cash Flow Investing | 2 668 938 | 1 136 739 | 1 319 036 | 1 339 247 | | | | | |
| Cash Flow Available for Debt Service | 2 668 938 | 1 136 739 | 1 319 036 | 1 339 247 | | | | | |
| Net Cashflow | 2 668 938 | 1 136 739 | 1 319 036 | 1 339 247 | | | | | |
| Reversing Cash | 1 269 938 | 1 136 739 | 1 319 036 | 1 339 247 | | | | | |
| Effect Exchange rates on cash | - | - | - | - | | | | | |
| Ending Cash | 2 668 938 | 2 423 796 | 3 738 832 | 5 078 079 | | | | | |
| Balance Sheet (INR) | | | | | | | | | |
| March | 2017 | 2018 | 2019 | 2020 | March | 2017 | 2018 | 2019 | 2020 |
| Fixed assets | 26 788 158 | 27 951 869 | 29 279 180 | 28 846 341 | | | | | |
| Other non-current assets | 28 788 158 | 27 951 869 | 29 279 180 | 28 846 341 | | | | | |
| Total non-current assets | 55 576 316 | 55 903 738 | 58 558 360 | 57 692 682 | | | | | |
| Cash | 30 306 069 | 37 763 209 | 33 306 090 | 38 840 122 | | | | | |
| Investments (long/short/derivatives) | 5 840 110 | 3 639 942 | 8 246 309 | 4 813 723 | | | | | |
| Receivables | 6 732 304 | 7 476 074 | 8 439 402 | 5 237 583 | | | | | |
| Prepaid Expenses | 3 116 693 | 2 519 090 | 2 564 097 | 3 230 020 | | | | | |
| Other current assets | 86 988 446 | 113 481 187 | 88 621 200 | 100 147 912 | | | | | |
| Total current assets | 113 773 442 | 146 843 644 | 112 200 390 | 129 260 223 | | | | | |
| Total assets | 240 349 758 | 240 747 382 | 240 758 750 | 236 952 905 | | | | | |
| Trade payables | 306 148 | 1 000 312 | 898 507 | 2 247 111 | | | | | |
| Other liabilities | 2 787 537 | 42 379 711 | 38 469 349 | 52 190 253 | | | | | |
| Other current liabilities | 30 306 069 | 63 306 069 | 29 279 180 | 56 599 598 | | | | | |
| Total current liabilities | 13 152 233 | 13 638 333 | 14 812 754 | 15 833 302 | | | | | |
| Other non-current liabilities | 17 772 165 | 18 638 800 | 17 944 199 | 20 060 657 | | | | | |
| Total liabilities | 30 924 398 | 32 277 133 | 32 756 953 | 35 893 959 | | | | | |
| Total equity & liabilities | 68 212 738 | 65 946 564 | 64 227 739 | 62 798 442 | | | | | |
| Trade | 0 | 208 | 208 | 208 | | | | | |
| Corporate | 125 000 | 125 000 | 125 000 | 125 000 | | | | | |
| Fund for Reserves/Disbursement & Matching Fund | 18 285 736 | 30 572 796 | 36 306 444 | 37 163 773 | | | | | |
| Reserve/Fund | 6 400 188 | 6 528 702 | 6 412 634 | 6 334 174 | | | | | |
| Reserve/Equity | 825 100 | 825 100 | 825 100 | 825 100 | | | | | |
| Reserve and Surplus | 2 000 200 | 2 000 200 | 2 000 200 | 2 000 200 | | | | | |
| Total Equity | 48 752 739 | 45 686 562 | 45 827 430 | 46 729 741 | | | | | |
| Total equity & liabilities | 113 773 442 | 146 843 644 | 112 200 390 | 129 260 223 | | | | | |

Step 8: Complete the enhanced IP DD report

Upon completion of the DD validation process (Step 5), developing the corrective risk action plan (step 6) and the Financial Health Check (Step 7) the BCI DD Coordinator will be in a position to complete the enhanced IP DD report. This report provides a summary of the key DD results and outcomes. These are as per figure 17 below which also outlines the process for completing the enhanced IP DD report, and figure 18 for a snapshot of the template, including a link to the template.

Figure 17: Process for completing the enhanced IP DD report

| 1. IP DD Details | 2. Record of meetings | 3. DD results | 4. Corrective risk action plan | 5. FHC of IPs AFS | 6. BCI HQ for approval |
|---|--|---|---|--|--|
| <ul style="list-style-type: none"> Input details of the IP DD as per template requirements (name of IP, start date, end date, IP DD team, BCI HQ team, BCI Country team, BCI Country team etc) | <ul style="list-style-type: none"> Complete the schedule of meetings and key activities undertaken during the DD process. | <ul style="list-style-type: none"> 3.1 Summary of DD results -Copy and paste from DD framework Tab 1 3.2 Key points to note on key areas of review -Complete sections accordingly | <ul style="list-style-type: none"> Complete the corrective action plan template by dropping in the detail from Tab 2 in the DD framework | <ul style="list-style-type: none"> Copy and paste the FHC template results for the IP into this section | <ul style="list-style-type: none"> Share with the BCI HQ lead for approval and sign off |

Tip 12: Start completing and uploading information to the enhanced IP DD report at kick off of the DD and thereafter on a weekly basis (e.g., Record of meeting/ key activities) and as information is complete and ready for input.

Figure 18: Enhanced IP DD Report Template

1. DD Details

| IP Name | Government Support Centre (GSC) Country | Year |
|---------|---|------|
| IP Name | Country | Year |

2. Record of meetings/Key activities

| Meeting/Activity and Purpose | Date | Attendees |
|------------------------------|------|-----------|
| Meeting/Activity and Purpose | Date | Attendees |

3. Due Diligence Results

DD has performed well with 98% of DD questions achieving green risk status.

| Question | Response | Green | Yellow | Red | Not Answered |
|----------|----------|-------|--------|-----|--------------|
| Question | Response | Green | Yellow | Red | Not Answered |

3.1 Summary of DD results

Scoring: DD has performed well with 98% of DD questions achieving green risk status. The risk has been assessed with the organization's own risk and as per the response and information provided there are no additional risk areas that require investigation by BCI.

Overview: The IP is an organization that has comprehensive and transparent systems in place for managing operational, financial, governance and environmental risks. These systems are robust and effectively detail processes and procedures for implementing the organization's respective policies.

Conclusion: Following a comprehensive review and assessment of the due diligence questionnaire submitted by GSC, it can be concluded that the organization poses a very low level of risk as an 'Implementing Partner' allowing project activities on behalf of BCI.

3.2 Key points to note on key areas of review

Ethics: GSC is governed by a set of core principles, which are supported by effective risk management systems and comprehensive operational policies that guide the actions of the organization and its employees. GSC has not been subject to any major investigations or litigation over the past five years and as such there are no substantive concerns regarding the ethical conduct of the organization's ongoing business.

Governance: GSC operates within a clear and transparent governance framework that enables the organization to operate and project activities to be carried out in a manner that is GSC's management accountable and without undue influence from external parties. The organization does have affiliations with government officials and bodies, but the relationships are clearly defined and pose no risk to the operations of GSC.

Financial stability: GSC has scored 98% on its financial health check. Furthermore, GSC robust financial management systems that exist effectively and are based on strong financial integrity.

Annual financial statements (AFS) health check: GSC scored 100% (a total of 30 points) out of a maximum score achievable of 30 points on the AFS health check. See an excel file 'GSC Financial Health Check of AFS 2021 to 2023' (11 June 2024).

Environment and operations: GSC operates within a clear and transparent governance framework that enables the organization to operate and project activities to be carried out in a manner that is GSC's management accountable and without undue influence from external parties. The organization does have affiliations with government officials and bodies, but the relationships are clearly defined and pose no risk to the operations of GSC.

Compliance: GSC's operational and financial management frameworks are robust and comply with all operational and statutory requirements.

Downstream: GSC does not work with local partners to implement projects activities and is not directly responsible for any quality, safety and/or BCI interventions are deployed.

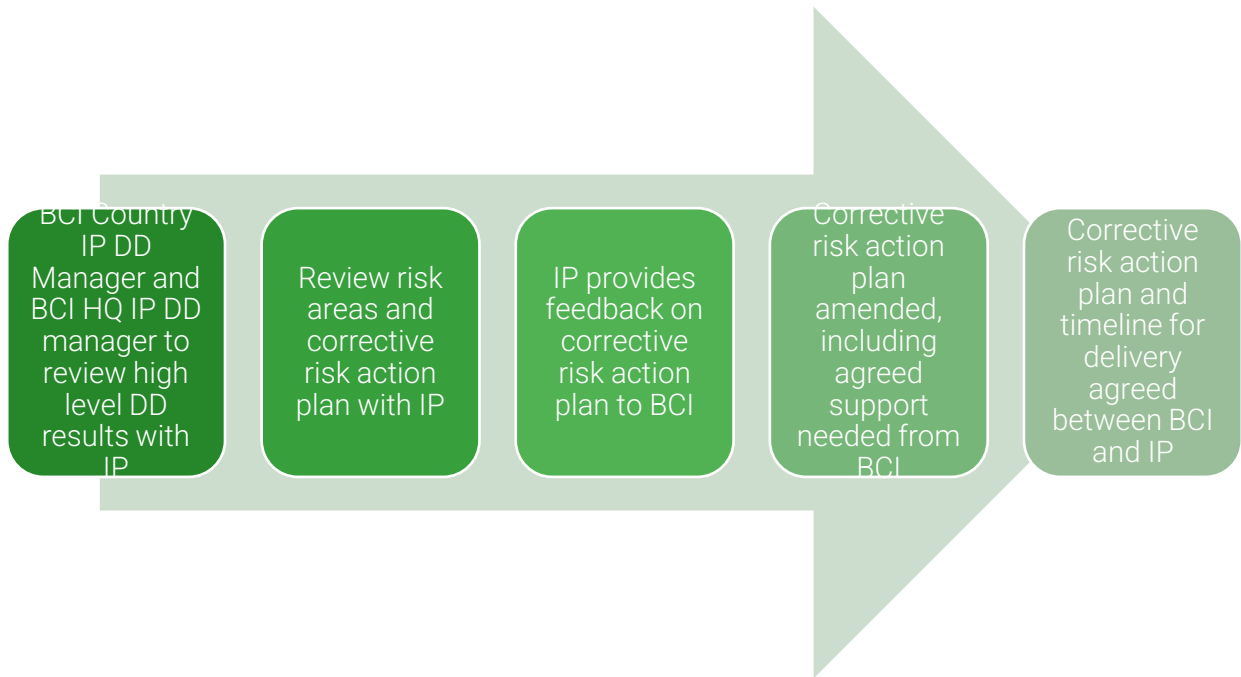
4. Corrective Risk Action Plan

| Question | Rating | Reason for risk rating | Corrective action | Timeline | By (ownership of corrective action) | By (review of corrective action) | By (Final approval of corrective action) |
|----------|--------|------------------------|-------------------|----------|-------------------------------------|----------------------------------|--|
| Question | Rating | Reason for risk rating | Corrective action | Timeline | By (ownership of corrective action) | By (review of corrective action) | By (Final approval of corrective action) |

Step 9: IP meeting to review DD results and agree to the corrective risk action plan

The DD process will culminate with BCI reviewing the results of the DD with the IP and agreeing the corrective risk action plan. See figure 19 below for guidance for the meeting to review the DD results and agree the action plan meeting with the IP.

Figure 19: Steps for the enhanced IP DD results and action plan meeting



Tip 13: It is important to ensure that senior management, CEO, Director is present at this meeting to ensure buy-in and support for agreeing the corrective risk action plan.

Tip 14: IP feedback on the corrective risk action plan is critical to ensure that it is fit for purpose and achievable.

Tip 15: Do not rush/force the IP into providing feedback on the corrective risk action plan or agreeing its contents immediately. If required, agree a timeline for the IP to provide feedback on the corrective risk action plan and arrange a follow-up meeting to formally agree its contents.

Tip 16: The IP may require BCI to share standard policy content and or additional support.

6. Key takeaways and learnings

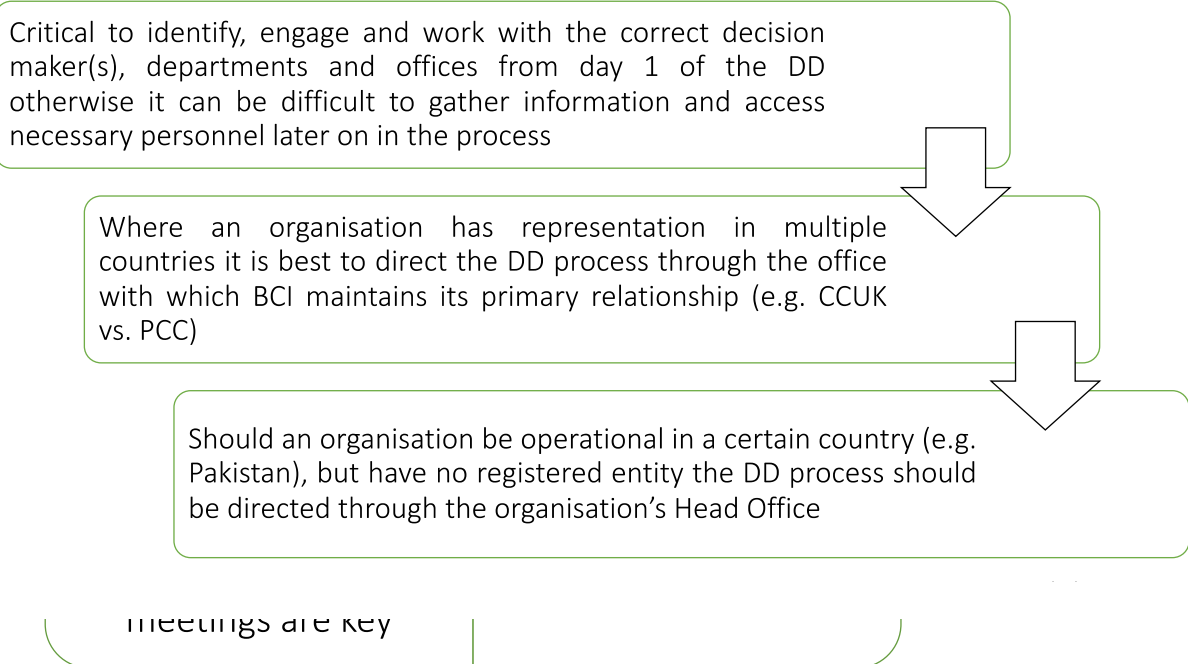
The below are key takeaways and learnings from the pilot to keep in mind as the BCI IP DD manager starts the enhanced DD process with an IP.

Overall, it is important for the BCI HQ team to check in regularly with the BCI IP DD manager to ensure they are on track if they are coming up against unforeseen challenges so to be able to ensure the DD stays on track and that the DD IP Manager has the support required to ensure the process is completed. This may mean that the BCI HQ team need to arrange a meeting with the IP's CEO and senior management.

1. Not a One-Size Fits All Process

- BCI works with a diverse network of IPs whose structure, size, geography, operations, mission/purpose, etc. will influence their willingness and ability to undertake the DD process
- As a result, some IPs will be better positioned to address the questions contained in the DD questionnaire due their level of formalisation, as well as governance, legal, financial, compliance and reporting requirements

3. Managing IPs with Complex Structure or International Presence



ANNEX 1: Examples of how to go through validating a question response (IP X example)

| Q13. Is there a grievance mechanism in place and is it known by staff? [Yes/No; please attach] | | |
|--|---|---|
| Step 1 – understand the question | 1. What information is being requested in the question? | <ul style="list-style-type: none"> Does IP X have a grievance policy in place? Is the grievance mechanism that is in place known by IP X staff? |
| | 2. What needs to be determined about the grievance process? | <ul style="list-style-type: none"> Are IP X's grievance mechanisms appropriate? <ul style="list-style-type: none"> Note this is the difference between receiving a 2 (amber) and a 4 (green) |
| Step 2 - Response 1 provided by IP | <ul style="list-style-type: none"> The response indicates that IP X has a grievance mechanism in place The policy document has been provided by IP X To determine if the response is sufficient as is it is necessary to review the policy document Attachments can be found in the Dropbox folder for the IP (sub-folder "Ethics", sub-sub folder "Q15") | |
| Step 2.a - Document Review | <ul style="list-style-type: none"> The grievance policy is not very detailed; only provides information for the contact person in the event that an employee would like to raise a grievance | |
| Step 2.b - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> What information is missing? <ul style="list-style-type: none"> Is the grievance mechanism known by staff? Is the grievance mechanism in place appropriate? <ul style="list-style-type: none"> We know that there is a procedure, but that has not been outlined in the policy or the written response |
| Step 3 – Response 2 provided by IP | <ul style="list-style-type: none"> The response gives a basic outline of the grievance procedure The IP has introduced a new policy that they are attributing to be part of the grievance policy The IP has identified that training is provided on an annual basis | |
| Step 3.a - Document Review | <ul style="list-style-type: none"> Policy provided is IP X's sexual harassment policy Does not encompass general grievances, so while it is helpful, it does not really relate to answering the question | |
| Step 3.b - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> What information is missing? <ul style="list-style-type: none"> It is still unclear whether the grievance mechanisms in place are acceptable More detail is required In this instance need to understand very clearly the sequence of events from time |

| | | |
|--|--|---|
| | | grievance raised and final decision communicated by management |
| Step 4 - Response 3 provided by IP | <ul style="list-style-type: none"> Sequence of events more clearly explained | |
| Step 4.a - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> The procedure that has been outlined is not codified Further confirmation is required from Senior Management in order to validate that the process as outlined in the response is accurate |
| Step 5 - Engage Senior Management [note that this step may not be necessary for all questions]. | <ul style="list-style-type: none"> Engage Senior Management - <i>if the process still remains unclear having engaged with the IP DD Point Person three times.</i> The process as outlined by in the response is not codified in the attached policy document Since the process is not codified further confirmation from a Senior Manager is required because at this time it still cannot be determined as to whether the grievance policy in place is acceptable | |
| Step 5.a - Response provided by the IP | <ul style="list-style-type: none"> Senior Manager provides confirmation and clarification related to the process provided in the written response | |
| Step 6 - Validating the Response | <ul style="list-style-type: none"> What can be concluded? <ul style="list-style-type: none"> There is a grievance mechanism in place at IP X The grievance mechanism is known by staff – induction and refresher training provided Grievance mechanisms in place are acceptable; however, the grievance process is not codified in the HR Handbook for Consultants. This does not pose any significant risk to BCI as the mechanisms are in place and known by staff, but should be addressed by the management team at IP X | |

| Q22.Are all statutory deductions (e.g. payroll deductions) paid and paid on time? [Yes/No] | | |
|--|---|--|
| Step 1 – understand the question | 1. What information is being requested in the question? | <ul style="list-style-type: none"> Confirmation that statutory deductions are paid in full and in a timely manner. |
| | 2. What needs to be determined? | <ul style="list-style-type: none"> Does IP X make its statutory deductions in line with the requirements of the countries that it operates in? |
| Step 2 - Response 1 provided by IP | <ul style="list-style-type: none"> Stated that the question is not applicable since IP X does not have an established entity in Mali | |
| Step 2.b - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> What information is missing? <ul style="list-style-type: none"> Confirmation that statutory deductions are paid in full and in a timely manner. Confirmation that IP X makes statutory deductions in line with the requirements of the countries that it operates in. |
| Step 3 – Response 2 provided by IP | <ul style="list-style-type: none"> Additional information provided does not adequately address the question | |
| Step 3.b - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> What information is missing? <ul style="list-style-type: none"> Confirmation that statutory deductions are paid in full and in a timely manner. Confirmation that IP X makes statutory deductions in line with the requirements of the countries that it operates in |
| Step 4 - Response 3 provided by IP | <ul style="list-style-type: none"> Provides some information as to how statutory deductions are paid by Consultants from IP X Mali However, no further indication as to whether the organisation makes its statutory deductions and how it does so. | |
| Step 4.a - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> What information is missing? <ul style="list-style-type: none"> Confirmation that statutory deductions are paid in full and in a timely manner. Confirmation that IP X makes statutory deductions in line with the requirements of the countries that it operates in |

| | |
|---|--|
| Step 5 - Engage Senior Management | <ul style="list-style-type: none"> • After 3 attempts by the IP DD Point Person the question has still not been adequately responded to and it appears that the IP DD Point Person might not be best suited to answering the question • Insight from a Senior Manager is required because at this time it still cannot be determined as to whether IP X makes its statutory deductions and how it does so. |
| Step 5.a - Response provided by the IP | <ul style="list-style-type: none"> • Information has been provided as to how IP X UK makes its statutory deduction at the global level and in country. |
| Step 6 - Validating the Response | <ul style="list-style-type: none"> • What can be concluded? <ul style="list-style-type: none"> ○ It can be confirmed based on the information provided that IP X makes all statutory deductions and pays them in full as the requirements of the countries that it operates in? |

Q33. With regards to data protection please describe how the Company/Organisation undertakes and records data, and how data gathered is managed and protected (in terms of, for example, managing/hosting/disclosing farmer and beneficiary data) [Please detail]

| | | |
|---|---|--|
| Step 1 – understand the question | 1. What information is being requested in the question? | <ul style="list-style-type: none"> • Does IP X have a Data Management and Security Policy? • If no, does IP X have suitable processes and procedures for managing beneficiary data? |
| | 2. What needs to be determined about the grievance process? | <ul style="list-style-type: none"> • Is the policy fit for purpose? |
| Step 2 - Response 1 provided by IP | <ul style="list-style-type: none"> • The response indicates that IP X has Security and Data Management Policy in place • The policy document has been provided by IP X • To determine if the response is sufficient as is it is necessary to review the policy document • Attachments can be found in the DropBox folder for the IP (sub-folder "Governance", sub-sub folder "Q28") | |
| Step 2.a - Document Review | <ul style="list-style-type: none"> • The Data and Security Management Policy appears to be applicable to use of IP X's website. • It appear that the question has not been properly understood | |
| Step 2.b - Is the response complete at this stage? | <ul style="list-style-type: none"> • No | <ul style="list-style-type: none"> • What information is missing? <ul style="list-style-type: none"> ○ Does IP X have a Data Management and Security Policy? ○ If no, does IP X have suitable processes and procedures for managing beneficiary data? ○ Is the policy fit for purpose |

| | | |
|---|---|--|
| Step 3 – Response 2 provided by IP | <ul style="list-style-type: none"> The response appears to indicate that IP X’s contract agreements with third parties such as BCI contains IT and confidentiality clauses, but is unclear what that means. No further clarification has been provided regarding the Data Management and Security Policy that was provided | |
| Step 3.a - Document Review | <ul style="list-style-type: none"> No additional documentation provided | |
| Step 3.b - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> What information is missing? <ul style="list-style-type: none"> Does IP X have a Data Management and Security Policy? If no, does IP X have suitable processes and procedures for managing beneficiary data? Is the policy fit for purpose |
| Step 4 - Response 3 provided by IP | <ul style="list-style-type: none"> No additional information provided | |
| Step 4.a - Is the response complete at this stage? | <ul style="list-style-type: none"> No | <ul style="list-style-type: none"> What information is missing? <ul style="list-style-type: none"> Does IP X have a Data Management and Security Policy? If no, does IP X have suitable processes and procedures for managing beneficiary data? Is the policy fit for purpose |
| Step 5 - Engage Senior Management | <ul style="list-style-type: none"> Engage Senior Management - <i>if the process still remains unclear having engaged with the IP DD Point Person three times.</i> Insight from a Senior Manager is required because at this time it still cannot be determined as to whether IP X has either a policy or processes in procedures for managing beneficiary data | |
| Step 5.a - Response provided by the IP | <ul style="list-style-type: none"> Feedback from Senior Management indicates that IP X does not have a Data Management and Security Policy in place for managing beneficiary data; rather the company implements data management and security protocols for specific projects as per the requirements of the donor partner There is no written policy and/or processes or procedures, but it was stated that IP X employs a sensible approach to managing and disclosing data Response is complete | |
| Step 6 - Validating the Response | <ul style="list-style-type: none"> What can be concluded? <ul style="list-style-type: none"> There is no Data Management and Security Policy in place at IP X There is a need for IP X to draft and implement a Data Management and Security Policy The risk posed to BCI is limited as the contract agreement between IP X and BCI will include provisions for managing beneficiary data | |

Partner Due Diligence Roll out
Applications deadline: 30th of January 2022

