



WATER • CLIMATE • HEALTH • PROSPERITY

*Transforming Water Security into
Climate Resilience and Shared Prosperity*

INSTITUTIONAL GOVERNANCE HANDBOOK

Policies, Governance Framework,
Board Charter & Institutional
Management Systems



WATER

Securing sustainable
water for all



CLIMATE

Building resilience
to climate change



HEALTH

Promoting healthy
communities



PROSPERITY

Empowering people.
Transforming lives.
Creating opportunities.



GOOD GOVERNANCE

Leading with integrity.
Accountable.
Transparent. Effective.

BUILDING ACCOUNTABLE, TRANSPARENT AND SUSTAINABLE WATER INSTITUTIONS.

WATER ABUNDANCE AFRICA (WAA)

OPERATIONAL MANUAL

Expanded Institutional Governance Handbook

Board Adoption Version | 2026-2030

Water • Climate • Health • Prosperity

Integrated institutional policies, Board governance framework, standard operating procedures, approval matrices, registers and donor/climate-finance readiness tools for accountable institutional management.

Document Control and Board Approval

Control Item	Board Approval Version Details
Organisation	Water Abundance Africa (WAA)
Document title	Operational Manual - Expanded Institutional Governance Handbook
Strategic period	2026-2030
Version	Board Approval Version 2.0
Document status	Prepared for Board review, adoption and controlled implementation
Effective date	[Insert effective date upon Board approval]
Review cycle	Annual management review and full revision by 2030, or earlier where law, donor requirements, Board direction or organisational risk exposure changes.
Approving authority	Board of Directors
Policy custodians	Executive Director; Finance and Corporate Services; Human Resources and Administration; Safeguarding Focal Person; Environmental and Social Safeguards Focal Point; MEAL Function; Board Committees.
Applicable geography	Kenya operations and other WAA programme locations, subject to applicable local law, donor agreements and international good practice.

Approval Signatures

Role	Name	Signature	Date
Board Chairperson			
Executive Director			
Finance, Audit & Risk Committee Chair			
Governance, Human Capital & Ethics Committee Chair			
Programmes & Impact Committee Chair			

Board Resolution for Adoption

RESOLVED THAT the Board of Directors of Water Abundance Africa (WAA) hereby reviews and approves this Operational Manual as the institutional governance and management handbook for the period 2026-2030, subject to insertion of the effective date, confirmation of delegated authority thresholds, and periodic review in line with Kenyan law, donor requirements, WAA strategy and Board direction.

RESOLVED FURTHER THAT management is authorised to operationalise the Manual through staff orientation, Board committee oversight, policy implementation plans, registers, standard operating procedures and annual compliance reporting to the Board.

Executive Summary for the Board

This Board Approval Version strengthens the WAA Operational Manual into an institutional handbook suitable for governance oversight, donor due diligence, climate-finance readiness and operational implementation. It preserves the core policies already consolidated in the draft manual and adds expanded governance instruments, standard operating procedures, implementation responsibilities, approval matrices, templates, registers and Board adoption tools.

The manual is designed to help WAA move from a set of stand-alone policies to a coherent institutional management system. It clarifies who approves, who implements, who monitors and who reports across governance, finance, human resources, safeguarding, gender equality and social inclusion, environmental and social safeguards, anti-fraud controls, and monitoring, evaluation, accountability and learning.

Key Strengthening Areas

- Expanded governance manual covering Board roles, committees, fiduciary oversight, ethics, risk, conflict of interest, delegation and Board performance.
- Detailed SOPs and implementation procedures for planning, procurement, payments, HR actions, safeguarding reporting, grievance handling, incident response, partner onboarding, MEAL and donor reporting.
- Approval matrices covering governance decisions, finance, procurement, HR, risk, safeguards, anti-fraud and donor grant management.
- Institutional templates and registers for Board resolutions, conflicts of interest, risk, procurement, assets, grants, safeguarding incidents, complaints, training, policies, partners and climate-finance readiness.
- Donor and climate-finance readiness improvements focusing on fiduciary systems, safeguards, gender and inclusion, anti-fraud, data protection, MEAL, procurement, environmental/social risk management and audit evidence.
- Board adoption package including approval resolution, implementation roadmap, annual compliance checklist and management certification.

Board Decision Requested

- Review and approve the Operational Manual as WAA's institutional governance and management handbook.
- Confirm delegated authority thresholds, bank signatory controls and procurement approval levels.
- Mandate management to train staff, partners and Board committees on the Manual within 60 days of approval.
- Require annual compliance reporting and policy review through the relevant Board committees.

Updated Table of Contents

Page numbers are generated from the Board Approval Version and should be refreshed if the document is edited further.

This section provides an updated high-level contents map for Board review. Microsoft Word users may also update the automatic Table of Contents field below after opening the document.

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Board Adoption Readiness Checklist

Readiness Area	Evidence Required	Lead Oversight	Frequency
Governance	Board charter, committee terms, delegation matrix, conflict of interest register, Board calendar and decision record.	Board Chair / Executive Director	Before approval / annually
Fiduciary controls	Finance policy, procurement controls, segregation of duties, bank mandates, audit trail, donor compliance files and asset registers.	Finance, Audit & Risk Committee	Quarterly
People and ethics	HR policy, Code of Conduct, safeguarding, GESI, disciplinary procedures, whistleblowing and training records.	Governance, Human Capital & Ethics Committee	Biannual
Programme quality	MEAL framework, risk register, results reporting, beneficiary feedback, data quality checks and learning reports.	Programmes & Impact Committee	Quarterly
Safeguards and climate finance	E&S screening, ESMP templates, GESI action plans, grievance mechanism, climate risk screening and donor readiness evidence.	Executive Director / E&S Focal Point	Project cycle / annual

Implementation principle: where donor requirements are stricter than WAA policy, the stricter requirement applies, provided it is consistent with applicable law and Board-approved governance controls.

WATER ABUNDANCE AFRICA (WAA)

OPERATIONAL MANUAL

2026-2030

Water • Climate • Health • Prosperity

Integrated policies and procedures for governance, finance, people management, safeguarding, inclusion, environmental and social safeguards, anti-fraud controls, and monitoring, evaluation, accountability and learning.

Draft for Board Review and Approval

Prepared: July 2026

Document Status: Consolidated Operational Manual

Document Control and Approval

This Operational Manual consolidates WAA's core institutional policies into one reference document for Board, management, staff, consultants, volunteers, partners and representatives. It should be read together with WAA's Constitution, Board resolutions, employment contracts, donor agreements, project contracts, statutory requirements and any additional policies adopted by the Board.

Item	Details
Organisation	Water Abundance Africa (WAA)
Document title	Operational Manual
Strategic period	2026-2030
Strategic anchor	Water • Climate • Health • Prosperity
Version	Draft Version 1.0
Effective date	[Insert effective date after Board approval]
Review cycle	Annual management review, with full review by 2030 or earlier if required by law, donor requirements, Board direction or organisational growth.
Approving authority	Board of Directors
Policy owners / custodians	Executive Director; Finance and Corporate Services; Human Resources and Administration; Safeguarding Focal Person; Environmental & Social Safeguards Focal Point; MEAL Function; relevant Board Committees.
Applicable geography	Kenya operations and other WAA programme locations, subject to applicable local law and donor requirements.

Legal and governance note: This consolidated manual is a governance and operational policy framework. Before formal adoption, WAA should review it against current Kenyan law, donor requirements and Board resolutions, and insert approval dates, authorised signatories and delegated authority thresholds where applicable.

Approval Signatures

Role	Name	Signature	Date
Board Chairperson			
Executive Director			
Finance, Audit & Risk Committee Chair			
Governance, Human Capital & Ethics Committee Chair			
Programmes & Impact Committee Chair			

Operational Manual Contents

This manual combines the following policy documents:

Part	Policy document	Function / coverage
Part 1	Finance Policy and Procedures	Financial governance, budgeting, accounting, cash management, procurement, reporting, audit, donor compliance and asset stewardship.
Part 2	Human Resource Policy and Procedures	Recruitment, contracts, staff management, performance, benefits, conduct, safety, grievances, consultants and exit procedures.
Part 3	Safeguarding / Child & Vulnerable Adults Protection Policy	Protection from abuse, exploitation, neglect, harassment and harm in WAA programmes, partnerships and operations.
Part 4	Gender Equality & Social Inclusion Policy	Equality, inclusion, accessibility, participation and non-discrimination across governance, programmes and workplace systems.
Part 5	Environmental & Social Safeguards Policy	Environmental and social risk screening, mitigation, public participation, grievance handling, E&S monitoring and safeguards compliance.
Part 6	Anti-Fraud, Corruption & Whistleblowing Policy	Fraud prevention, anti-corruption controls, reporting channels, whistleblower protection, investigations and sanctions.
Part 7	Monitoring, Evaluation, Accountability & Learning Policy	Results tracking, evaluation, accountability, learning, data quality, evidence use and reporting.

Note: The policy modules are intentionally retained as self-contained sections so that each can be reviewed, updated and approved by WAA governance bodies while remaining part of this consolidated Operational Manual.

PART 1

FINANCE POLICY AND PROCEDURES

Operational Manual Section

WATER ABUNDANCE AFRICA FINANCE POLICY AND PROCEDURES

2026 - 2030

Water | Climate | Health | Prosperity

Draft for Board Review and Adoption

Prepared from WAA strategic information and sample NGO finance policies

Item	Detail
Document owner	Board of Directors / Finance and Audit Committee
Operational custodian	Executive Director and Finance Manager
Effective date	[Insert date after Board approval]
Review cycle	Annually, or earlier where required by law, donor agreement or Board decision
Version	1.0 Draft
Applicable currency	Kenya Shillings (KSh), unless a donor agreement specifies otherwise

Document Control and Authorization

This Finance Policy and Procedures Manual establishes Water Abundance Africa (WAA) rules for financial governance, planning, budgeting, accounting, cash management, procurement, reporting, asset stewardship, audit, risk management and donor compliance. It is designed to strengthen transparency, accountability, internal control, value for money and responsible stewardship of funds entrusted to WAA.

Control item	Details
Organisation	Water Abundance Africa (WAA)
Document title	Finance Policy and Procedures
Strategic alignment	WAA Institutional Strategy 2026-2030: Water, Climate, Health and Prosperity
Approved by	Board of Directors
Recommended by	Finance and Audit Committee
Operationally implemented by	Executive Director, Finance Manager, Programme Managers and all staff
Effective date	[Insert date]
Next review date	[Insert date]

Approval	Name	Signature	Date
Board Chairperson			
Treasurer / Finance and Audit Committee Chair			
Executive Director			
Finance Manager			

Note: All thresholds, delegated authorities and signature mandates in this document should be formally confirmed by Board resolution before implementation.

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20. 20. Review, compliance and policy improvement
21. Annexes: Authorisation matrix, forms and registers

This is a working contents list. If WAA later adds an automatic Microsoft Word Table of Contents, update the field after final editing.

1. Purpose, Scope and Policy Principles

1.1 Purpose

The purpose of this policy is to provide a practical financial management framework for WAA that supports proper stewardship of donor funds, unrestricted funds, project assets and organisational resources. The policy sets procedures for fiscal accountability, internal controls, budget discipline, accounting, financial reporting, payments, procurement, audit, compliance and risk management.

1.2 Scope

This policy applies to the Board of Directors, Finance and Audit Committee, Executive Director, Finance Manager, Programme Managers, project staff, volunteers, consultants, contractors and any other person handling or approving WAA funds, assets or financial records. It applies to all WAA programmes, projects, grants, partnerships, offices and field activities.

1.3 Policy principles

- Transparency and accountability in all financial decisions and reporting.
- Segregation of duties so that no single person controls approval, custody, recording and reconciliation of the same transaction.
- Value for money in procurement, programme delivery and use of donor funds.
- Compliance with Kenyan law, donor agreements, Board resolutions and relevant international good practice.
- Restricted funds must be used only for the purpose approved by the donor or funder.
- All transactions must be supported by original or verifiable electronic documentation.
- Financial information must be timely, complete, accurate and useful for management and Board decision-making.
- WAA applies zero tolerance for fraud, corruption, bribery, diversion of funds, conflict of interest, exploitation and harassment.

2. Institutional Alignment with WAA Strategy

WAA is positioned as a Climate-Water-Health Nexus Platform. Its finance policy must therefore support integrated programming across water security, climate resilience, renewable energy, public health, food systems, education, environmental stewardship and innovative finance. Financial controls should enable WAA to mobilise resources, manage multiple donor-funded projects, safeguard assets and provide credible evidence of impact.

WAA strategic area	Financial management implication
Water security and climate resilience	Project budgets must separately track infrastructure, community engagement, safeguards, maintenance and monitoring costs.
Clean energy for water and livelihoods	Solar and energy assets must be capitalised, tagged, insured where appropriate and included in an asset register.
WASH, health and climate preparedness	Programmes must maintain activity documentation, attendance lists, training materials, distribution records and financial evidence.
Food, nutrition and education security	School and community projects must show value-for-money, beneficiary reach and responsible use of supplies.
Finance, inclusion and private sector	Co-financing, blended finance, carbon finance and

WAA strategic area	Financial management implication
	unrestricted income must be separately reported and governed.
Policy, advocacy and Global South partnerships	Knowledge, convening, travel and partnership costs must be budgeted, approved and reported transparently.
WAA financial management goal To ensure that every shilling entrusted to WAA is properly planned, approved, spent, recorded, reported and audited in support of water-secure, climate-resilient, healthy and prosperous communities.	

3. Governance Roles and Segregation of Duties

3.1 Board of Directors

- Approves this finance policy, annual budgets, major budget amendments, audited financial statements and major financial commitments.
- Approves opening and closing of bank accounts, bank signatories, borrowing, major contracts and investment/reserve policies.
- Receives quarterly financial reports and management accounts through the Finance and Audit Committee.
- Ensures that WAA has an appropriate control environment, ethical leadership and a functional risk management system.

3.2 Finance and Audit Committee

- Reviews annual budgets, financial reports, audit findings, procurement reports, risk registers and donor compliance matters.
- Recommends approval of audited financial statements and external auditor appointment to the Board.
- Reviews budget variances, cash flow and financial reporting risks, including fraud and irregularities.
- Monitors implementation of internal and external audit recommendations.

3.3 Executive Director

- Provides overall accountability for implementation of this policy and for donor compliance.
- Approves expenditures, procurement and contracts within delegated authority.
- Ensures programme and finance teams cooperate in budgeting, reporting, procurement planning and documentation.
- Reports significant financial risks, irregularities or donor compliance matters to the Finance and Audit Committee.

3.4 Finance Manager

- Maintains the accounting system, chart of accounts, bank reconciliations, cash book, asset register and financial files.
- Prepares monthly management accounts, donor financial reports, cash flow forecasts and budget variance reports.
- Reviews payment documentation, verifies budget availability and ensures transactions are coded correctly.
- Maintains donor financial compliance files, payroll records, statutory deductions and audit schedules.

3.5 Programme Managers and Project Leads

- Prepare project budgets, workplans, procurement plans and activity schedules with support from finance.
- Confirm that goods, services and activities have been delivered before payment is requested.
- Maintain narrative evidence such as attendance lists, field reports, beneficiary lists, photos where appropriate and activity reports.
- Monitor project progress against budget and inform finance of changes requiring donor approval.

3.6 Segregation of duties

WAA shall separate responsibilities for initiating, approving, paying, recording and reconciling transactions wherever staffing levels allow. Where a small team requires one person to perform more than one function, the Executive Director and Finance and Audit Committee shall institute compensating controls such as independent review, dual approval, supporting-document checks and monthly reconciliation review.

Function	Primary responsibility	Control requirement
Initiation/request	Programme or operations staff	Request must be supported by approved workplan/budget.
Budget check	Finance Manager	Finance confirms budget line and funding availability.
Approval	Authorized signatory or delegated officer	Approval must follow the authority matrix.
Payment execution	Finance officer/Finance Manager with bank signatories	Dual approval for electronic transfers and cheques.
Recording	Finance team	All entries coded to project, donor, activity and account.
Reconciliation/review	Finance Manager and independent reviewer	Monthly bank and petty cash reconciliations reviewed and signed.

4. Accounting System and Financial Records

WAA shall maintain a practical accounting system capable of producing accurate financial statements, donor reports, budget variance reports, project expenditure schedules, asset registers and audit trails. The accounting system may be computerized and cloud-backed, but all transactions must remain supported by source documents and approvals.

4.1 Accounting basis and chart of accounts

- The Board shall approve the accounting basis used for statutory financial statements, with donor reports prepared according to donor agreements where required.
- The Finance Manager shall maintain a chart of accounts that separates unrestricted funds, restricted donor funds, project funds, administrative costs, capital assets, liabilities and reserves.
- Each donor project shall have a distinct project code, budget line and reporting structure to enable project-level monitoring.
- Corrections or journal entries must be documented, reviewed and approved by the Finance Manager or Executive Director depending on materiality.

4.2 Source documents

Every financial transaction must be supported by adequate documentation. Supporting documents may include donor agreements, approved budgets, requisitions, purchase orders, quotations, procurement

evaluation records, contracts, invoices, receipts, delivery notes, goods received notes, attendance registers, activity reports, bank statements, payment vouchers and proof of payment.

4.3 Filing and audit trail

- Financial documents shall be filed by project, month, transaction type and donor where applicable.
- Electronic documents shall be stored in secure folders with controlled access and regular backups.
- No invoice shall be paid twice; invoices must be stamped or marked PAID after payment and linked to the payment voucher/reference.
- All financial records shall be retained for at least seven years, or longer if required by law, donor agreement, litigation hold or audit requirement.

5. Donor Agreements and Restricted Funds

A donor agreement is the controlling document for donor-funded projects. Before implementation, the Executive Director, Programme Manager and Finance Manager must jointly review the donor agreement, approved budget, reporting dates, procurement rules, eligible costs, disbursement schedule, audit requirements, branding requirements and approval procedures for budget changes.

Donor compliance area	Minimum WAA requirement
Budget	Use the approved donor budget and maintain project-level budget monitoring.
Eligible costs	Expenditures must be within approved activities, budget lines and donor eligibility rules.
Reporting	Submit financial and narrative reports within donor timelines.
Procurement	Apply donor procurement rules where they are stricter than WAA rules.
Assets	Tag, record and dispose of donor-funded assets according to donor terms.
Amendments	Obtain written donor approval before material activity or budget changes.

5.1 Restricted and unrestricted funds

- Restricted donor funds must be used only for the purpose for which they were granted.
- Unrestricted funds may be used for approved institutional priorities, core costs, reserves or bridging approved cash flow gaps.
- Overhead and administrative recovery shall be treated according to the donor agreement and Board-approved budgeting rules.
- Co-financing commitments must be documented, valued and reported transparently as cash or in-kind contribution.

6. Annual Planning, Budgeting and Budget Control

Budgeting shall link WAA strategic objectives to annual operations, programmes and spending. Budgets shall be realistic, activity-based, project-coded and aligned with workplans and donor agreements.

6.1 Annual budget process

22. Programme teams prepare annual workplans, procurement plans and activity budgets.

23. The Finance Manager consolidates organisational and project budgets and prepares cash flow projections.
24. The Executive Director reviews the draft budget for strategic fit, resource availability and implementation feasibility.
25. The Finance and Audit Committee reviews the budget and recommends it to the Board.
26. The Board approves the annual budget before the start of the financial year or programme period.

6.2 Budget monitoring

- Monthly budget-versus-actual reports shall be prepared for management review.
- Variance explanations shall be provided for significant over-spending, under-spending or reallocation needs.
- No expenditure shall be approved unless a budget exists, funds are available and the activity is permitted.
- Project managers shall review project expenditure with finance at least monthly during active implementation.

6.3 Budget amendments

Budget amendments may be required when programme activities, donor requirements, procurement prices or operating conditions change. Material budget changes require approval by the authority specified in the delegation matrix and, for donor-funded projects, written donor approval where required. Management shall not move funds between restricted donor budget lines where the donor agreement requires prior approval.

Type of change	Approval required
Minor reallocation within same activity and within donor rules	Programme Manager and Finance Manager; Executive Director informed.
Reallocation between major budget lines	Executive Director and Finance and Audit Committee, plus donor approval where required.
Increase in total budget or new financial commitment	Board approval and donor/partner approval where applicable.
Unbudgeted emergency expenditure	Executive Director may approve within emergency authority; report to Finance and Audit Committee at next meeting.

7. Bank Accounts, Cash Management and Reconciliations

7.1 Bank account opening and closure

- All bank accounts must be opened in the name of Water Abundance Africa or a legally approved project account name.
- Opening or closing any bank account requires Board approval or a delegated Board resolution.
- The Finance Manager shall maintain a bank account register showing bank name, account number, currency, purpose, signatories and date opened/closed.
- Separate project accounts or sub-accounts may be opened where required by donors or where they improve project fund control.

7.2 Signatories and online banking

- At least two authorized signatories shall approve all bank payments and electronic transfers.

- The Finance Manager shall maintain the approved signatory list and immediately update the bank after staff or Board changes.
- Online banking rights shall be role-based. Preparation of a payment, approval of payment and reconciliation should be separated where possible.
- Passwords, tokens and mobile approval devices shall not be shared. Bank credentials must be kept secure.

7.3 Monthly bank reconciliations

The Finance Manager shall ensure that every bank account is reconciled monthly. Reconciliations must compare the accounting records to bank statements, explain reconciling items, identify stale payments and deposits in transit, and be reviewed by an independent reviewer or the Executive Director. Unusual items, suspected fraud or unreconciled differences shall be reported promptly to the Finance and Audit Committee.

7.4 Cash flow management

- Finance shall prepare cash flow forecasts for active projects and the organisation as a whole.
- Restricted funds must not be used to cover unrelated expenses or other donor projects.
- The Executive Director and Finance Manager shall monitor liquidity, pending donor disbursements and core-cost coverage.
- Any need for bridging finance, overdraft or borrowing must be approved by the Board and supported by a written repayment plan.

8. Receipts, Income and Grants Management

All funds received by WAA shall be recorded promptly and deposited into the appropriate bank account. Sources may include donor grants, philanthropy, county or government contributions, private-sector partnerships, consulting or technical service income, community contributions, bank interest, carbon finance and other approved income streams.

- Receipts must be issued or recorded for all cash or bank transfers received.
- Income shall be coded by source, restriction, project and donor where applicable.
- Grant receipts must be matched to donor agreements and disbursement schedules.
- In-kind contributions must be documented, valued where possible and approved by finance before inclusion in reports.
- Refunds to donors or partners must be approved in accordance with the donor agreement and Board policy.

9. Petty Cash and Advances

9.1 Petty cash

Petty cash shall be used only for small, urgent, approved expenses where bank transfer is not practical. Petty cash shall not be used to avoid procurement procedures or payment approvals.

Control area	Policy requirement
Custodian	A designated petty cash custodian approved by the Finance Manager.
Imprest amount	Recommended maximum KSh 30,000 unless otherwise

Control area	Policy requirement
	approved by the Board.
Single transaction limit	Recommended maximum KSh 5,000 unless approved by the Executive Director.
Voucher	Every withdrawal must have a petty cash voucher, approval, purpose and recipient signature.
Receipt	Original receipt or signed acknowledgement must be returned and attached to the voucher.
Reconciliation	Petty cash must be reconciled monthly and before every replenishment.
Shortages	Unexplained shortages are the responsibility of the custodian and must be reported.

9.2 Staff advances

- Advances may be issued only for approved programme, travel or operational activities.
- No staff member may receive a new advance before fully accounting for previous advances unless approved by the Executive Director.
- Advances must be accounted for within seven working days after completion of the activity or return from travel.
- Unspent balances must be returned to WAA immediately and recorded.
- Unretired advances may be recovered from salary or other amounts due after written notice, subject to applicable law.

10. Expenditure, Payments and Supporting Documents

All payments must be lawful, budgeted, approved, supported and properly recorded. The payment process must confirm that the goods or services were received, the price is reasonable, the supplier is legitimate, the budget line is correct and the payment is not a duplicate.

10.1 Payment package

- Approved payment request or voucher.
- Approved purchase requisition or workplan reference.
- Purchase order or contract where applicable.
- Invoice, receipt or supplier claim.
- Goods received note, delivery note, completion certificate or activity report.
- Procurement documentation such as quotations, evaluation sheet or sole-source justification.
- Budget code and project code.
- Bank details verified by finance.

10.2 Payment method

- Payments should normally be made by bank transfer, mobile money, cheque or other traceable method approved by finance.
- Cash payments should be limited to petty cash and documented field circumstances.
- Blank cheques are prohibited. Cheques must not be signed before being completed.
- Electronic transfers require two approvals by authorised signatories.
- Payments should be made within 30 days of receiving a complete and approved invoice, unless contract terms or donor requirements state otherwise.

10.3 Prohibited payments

- Payments without documentation or approval.
- Payments outside donor rules or approved budgets.
- Payments to staff or suppliers with unresolved conflict of interest unless fully disclosed and approved.
- Facilitation payments, bribes, kickbacks or gifts intended to influence a decision.
- Advances to suppliers unless explicitly provided for in a contract and secured where appropriate.

11. Procurement of Goods, Works and Services

Procurement shall be competitive, fair, transparent, ethical and based on value for money. WAA shall comply with donor procurement rules where those rules are stricter than this policy. Procurement planning shall be linked to approved budgets and project workplans.

11.1 Procurement methods and thresholds

The following thresholds are recommended for Board review and adoption. Donor rules may require lower thresholds or additional documentation.

Estimated value	Minimum procurement method	Approval
Up to KSh 20,000	Direct purchase with receipt and budget check.	Programme lead / Finance Manager depending on budget holder.
KSh 20,001 - 100,000	At least two quotations where practical.	Finance Manager and Programme Manager.
KSh 100,001 - 500,000	At least three written quotations and evaluation summary.	Executive Director with Finance review.
KSh 500,001 - 2,000,000	Formal RFQ/RFP with evaluation committee.	Executive Director and Finance and Audit Committee notification.
Above KSh 2,000,000	Open tender or formal RFP unless sole source is justified.	Board approval, after Finance and Audit Committee review.

11.2 Procurement file

- Approved purchase request and budget confirmation.
- Terms of reference, specification or bill of quantities.
- Quotations, bids, RFP responses or sole-source justification.
- Evaluation criteria and supplier selection record.
- Conflict of interest declarations for evaluation committee members where applicable.
- Purchase order, contract or service agreement.
- Delivery notes, completion certificates and invoice.
- Supplier performance notes for significant contracts.

11.3 Sole sourcing and emergency procurement

Sole sourcing may be allowed only where there is a clear documented justification, such as unique supplier capability, compatibility with existing systems, failed competitive process, urgent emergency response or donor-approved supplier. Emergency procurement must be documented, approved by the Executive Director within delegated limits, reported to the Finance and Audit Committee and reviewed after the event.

11.4 Supplier conduct

- Suppliers must be selected on price, quality, capacity, compliance, delivery time, ethical conduct and value for money.

- Suppliers must not offer bribes, kickbacks or personal benefits to WAA staff or Board members.
- WAA shall avoid related-party transactions unless disclosed, justified and approved by the Board or Finance and Audit Committee.
- Major suppliers may be evaluated periodically for quality, timeliness, documentation and compliance.

12. Payroll, Consultants and Statutory Deductions

12.1 Payroll

- All staff must have approved contracts or appointment letters before being included on payroll.
- Payroll changes must be supported by approved HR documentation, including appointment, salary change, leave without pay, termination or deduction instructions.
- Salaries shall be paid through bank transfer or other traceable method approved by the Board.
- Pay slips shall show gross pay, statutory deductions, other authorised deductions and net pay.
- Statutory deductions shall be remitted within legal timelines to the relevant Kenyan authorities.
- Payroll shall be reviewed by the Finance Manager and approved by the Executive Director or designated authority before payment.

12.2 Consultants and temporary personnel

- Consultants must have a signed agreement or contract before work begins.
- The agreement must state scope of work, deliverables, timeline, fee, tax treatment, payment schedule, donor/project code and ownership of outputs.
- Consultant payments shall be made only after deliverables are certified as satisfactory by the responsible manager.
- Applicable withholding tax or statutory deductions shall be applied in line with Kenyan law and donor requirements.

13. Travel, Per Diem and Reimbursable Expenses

Travel and reimbursable expenses must be necessary for WAA business, pre-approved, reasonable, budgeted and supported by evidence. Travel shall be planned to achieve programme objectives at the lowest reasonable total cost while considering safety and effectiveness.

Expense type	Requirement
Transport	Use the most economical safe option. Attach tickets, receipts or mileage log where applicable.
Accommodation	Use approved rates or donor rates. Attach invoice/receipt unless per diem rules apply.
Meals and per diem	Apply Board-approved rates or donor-approved rates. Do not double-claim meals and per diem.
Fuel	Attach fuel receipt, vehicle details, odometer reading or trip log where applicable.
Communication/airtime	Must be approved, work-related and supported by request or receipt.
Reimbursement	Claim must be submitted within seven working days with original evidence.

Per diem rates shall be approved separately by the Board or Executive Director within delegated authority and may vary by donor, location and project. Where donor rules prescribe rates, donor rates prevail.

14. Fixed Assets, Inventory and Supplies

WAA handles project assets such as borehole equipment, solar equipment, water storage infrastructure, IT equipment, office furniture, field equipment, vehicles, motorcycles, tools and materials. These assets must be properly acquired, recorded, safeguarded, maintained and disposed of.

14.1 Capitalisation and asset register

- The Board shall approve a capitalisation threshold. Until approved, WAA may use KSh 50,000 as a working threshold for asset register purposes.
- All donor-funded assets shall be recorded regardless of value where donor rules require tracking.
- The asset register shall include asset description, tag number, serial number, purchase date, cost, funding source, location, custodian, condition and disposal status.
- Assets shall be tagged where practical and physically verified at least annually.

14.2 Safeguarding and maintenance

- Assets must be assigned to custodians who are responsible for proper use and safekeeping.
- Assets should be insured where cost-effective and where required by donor or Board policy.
- Repairs and maintenance should be budgeted and supported by approved work orders or service records.
- Loss, theft, damage or misuse of assets must be reported immediately to management and investigated.

14.3 Disposal

Disposal of assets requires written approval according to the authorization matrix and donor approval where the asset was donor-funded. Disposal must be transparent, documented and based on fair value where applicable. The asset register and accounting records must be updated after disposal.

15. Financial Reporting, Donor Reporting and Audit

15.1 Monthly management reporting

The Finance Manager shall prepare monthly summaries of income and expenditure by project and budget line. Reports shall compare actual expenditure to approved budget, show variances, list cash and bank balances, report advances outstanding, and highlight compliance or liquidity issues.

Report	Frequency	Prepared by	Reviewed by
Bank reconciliation	Monthly	Finance team	Finance Manager / Executive Director
Petty cash reconciliation	Monthly and on replenishment	Petty cash custodian	Finance Manager
Budget versus actual report	Monthly	Finance Manager	Executive Director / Programme Managers
Donor financial report	As per agreement	Finance Manager	Executive Director
Management accounts	Quarterly	Finance Manager	Finance and Audit Committee
Annual financial statements	Annually	Finance Manager / external accountant	Board and external auditor
Audit report	Annually or as donor requires	External auditor	Board / donors

15.2 Donor reporting

- Narrative and financial reports must be consistent and submitted according to donor timelines.
- Financial reports shall show cumulative expenditure, budget balance, advance/liability status and explanations for major variances.
- Programme teams shall provide activity records and outputs to support financial reporting.
- Any material change in project activities, budget lines or timeframe must be approved by the donor before implementation where the donor agreement requires it.

15.3 External audit

WAA shall undertake an annual external audit where required by law, donor agreement or Board policy. The external auditor shall be independent and appointed or confirmed by the Board. The Finance Manager shall provide audit schedules, bank reconciliations, donor reports, asset records, payroll schedules and supporting documents within the agreed audit timetable. Audit findings shall be tracked until resolved.

16. Fraud, Anti-Corruption, Ethics and Whistleblowing

WAA has zero tolerance for fraud, corruption, bribery, kickbacks, theft, diversion of funds, falsification of records, conflict of interest, exploitation, harassment or abuse of authority. Every staff member, Board member, consultant and supplier has a duty to protect WAA resources and report suspected wrongdoing.

Risk area	Control response
Fraudulent invoices	Supplier verification, purchase orders, receiving documents and payment review.
Duplicate payments	Invoice numbering, paid stamp/reference and finance review.
Procurement collusion	Competitive quotes, evaluation committee and conflict declarations.
Cash misuse	Petty cash vouchers, limits, reconciliations and surprise checks.
Conflict of interest	Annual declarations and transaction-specific disclosure.
Whistleblower retaliation	Confidential reporting and Board oversight.

16.1 Reporting suspected fraud

- Suspected fraud or irregularity shall be reported to the Executive Director, Board Chair, Finance and Audit Committee Chair or designated confidential reporting channel.
- Reports shall be investigated promptly and confidentially.
- Evidence must be preserved. Suspected persons must not be alerted in a way that compromises investigation.
- Confirmed fraud shall result in corrective action, recovery efforts, disciplinary action and reporting to donors or authorities where required.

17. Risk Management, Insurance and Business Continuity

Financial risk management is part of WAA enterprise risk management. Finance, programmes and governance teams shall jointly identify risks affecting funds, assets, projects, data, staff safety, compliance and reputation.

Risk	Mitigation
Funding volatility	Diversified funding, unrestricted income growth, cash flow forecasting and reserves.
Programme delays	Robust planning, contingency budgets, procurement plans and partner capacity support.
Fraud/corruption	Internal controls, independent audits, procurement rules and whistleblower protection.
Cybersecurity/data loss	Access controls, backups, secure records management and staff awareness.
Climate disruptions	Climate-risk screening, adaptive design and continuity planning.
Regulatory change	Monitoring legal requirements and maintaining government engagement.

17.1 Insurance

- WAA shall assess the need for insurance for vehicles, assets, offices, staff, Board liability, public liability, project equipment and field risks.
- Insurance coverage shall be reviewed annually by management and reported to the Finance and Audit Committee.
- Claims shall be documented and reported promptly to insurers and the Board where material.

17.2 Business continuity

WAA shall maintain procedures for continuity of critical finance functions during emergencies, including access to bank accounts, payroll, donor reporting, backups, authorisation continuity and field fund controls.

18. Records Management and Information Security

- Financial records shall be kept in secure physical and electronic storage.
- Access to finance folders, accounting systems and bank platforms shall be limited to authorised personnel.
- Backups shall be maintained for accounting data, donor reports and critical records.
- Confidential financial, payroll and donor information shall not be disclosed without proper authority.
- Non-sensitive data may be shared for transparency, learning and reporting where approved by management and compliant with privacy requirements.

19. Resource Mobilisation, Reserves and Investment Readiness

WAA aims to mobilise climate finance, blended finance, private investment, carbon finance and philanthropic capital. Sound financial management is essential to demonstrate fiduciary capacity, qualify for donor funding and manage larger portfolios.

19.1 Resource mobilisation controls

- All proposals and budgets submitted to donors must be reviewed by finance before submission.
- Cost recovery and overhead should be included in donor budgets where permitted.
- Co-financing commitments must be realistic, approved and documented.
- New grants shall be reviewed for financial risks, reporting burden, cash flow implications and compliance obligations before acceptance.

19.2 Reserves and unrestricted income

The Board should progressively establish a reserve policy to strengthen liquidity, continuity and institutional sustainability. Reserve targets should be informed by WAA cash flow, donor cycles, core staff costs, emergency needs and strategic growth. Unrestricted income should be budgeted, monitored and used only for Board-approved institutional priorities.

19.3 Investment readiness

To support donor and climate-finance readiness, WAA shall maintain strong fiduciary systems, procurement controls, financial reporting, safeguards, gender and inclusion systems, anti-fraud controls, project preparation records and audit evidence.

20. Review, Compliance and Policy Improvement

This policy shall be reviewed at least annually and updated when there are changes in WAA structure, donor requirements, Kenyan legal requirements, accounting systems, bank controls, procurement thresholds or organisational risk profile.

- The Finance Manager shall maintain a register of policy issues, exceptions and suggested improvements.
- The Executive Director shall ensure staff receive orientation on this policy.
- The Finance and Audit Committee shall review major policy exceptions and recommend improvements to the Board.
- Failure to comply with this policy may lead to disciplinary action, recovery of funds, contract termination or reporting to donors or authorities as appropriate.

Annex A: Recommended Authorization and Delegation Matrix

The following matrix is recommended for Board review and formal adoption. Where a donor agreement is stricter, donor requirements shall prevail.

Transaction/value	Programme Manager	Finance Manager	Executive Director	Finance & Audit Committee / Board
Budget preparation	Prepare project input	Consolidate and review	Approve draft	Review and approve final budget
Up to KSh 20,000	Request/approve within budget	Budget check and process	May approve exceptions	N/A
KSh 20,001 - 100,000	Request and confirm delivery	Verify documentation	Approve	N/A
KSh 100,001 - 500,000	Request and technical review	Verify budget and procurement	Approve	Notified where material
KSh 500,001 - 2,000,000	Request and evaluation panel	Finance review	Recommend/approve within delegated limit	Review or approve depending on project
Above KSh 2,000,000	Technical input	Finance review	Recommend	Approve
Bank account opening/closure	N/A	Prepare request	Recommend	Approve
Borrowing/overdraft	N/A	Prepare cash flow analysis	Recommend	Approve
Asset disposal	Recommend	Verify asset record	Approve within limit	Approve material disposals

Annex B: Payment Voucher Checklist

- Payment voucher number and date.
- Payee name and verified bank/mobile money details.
- Project code, activity code and budget line.
- Amount in figures and words, including tax treatment.
- Approved requisition or purchase order.
- Invoice and supplier documents.
- Delivery note, goods received note or completion certificate.
- Procurement documentation or sole-source justification.
- Budget availability confirmed by finance.
- Approval signatures according to the authorization matrix.
- Proof of payment attached after payment.

Annex C: Petty Cash Voucher Template

Field	Details to complete
Voucher number	
Date	
Requested by	
Purpose/activity	
Project/budget code	
Amount requested	KSh
Approved by	
Received by/signature	
Receipt attached	Yes / No

Field	Details to complete
Amount spent	KSh
Balance returned	KSh
Reviewed by finance	

Annex D: Staff Advance Liquidation Form

Field	Details
Staff name	
Project/activity	
Advance amount issued	KSh
Date issued	
Activity completion date	
Total spent	KSh
Balance returned / additional reimbursement	KSh
Receipts attached	Yes / No
Prepared by	
Reviewed by Finance Manager	
Approved by Executive Director	

Annex E: Asset Register Minimum Fields

Field	Description
Asset tag number	Unique WAA or donor asset number.
Asset description	Item description and model.
Serial number	Manufacturer serial number where available.
Purchase date	Date acquired.
Supplier	Supplier or donor source.
Cost	Purchase cost and currency.
Funding source	Donor/project/unrestricted.
Location	Office/site/school/community location.
Custodian	Responsible staff or partner.
Condition	Good/fair/poor/lost/disposed.
Disposal details	Approval, date, method and proceeds if applicable.

Annex F: Procurement Evaluation Summary

Supplier	Quoted amount	Compliance	Delivery time	Score/remarks

Evaluation panel declaration: We confirm that we have reviewed the quotations/proposals fairly, declared any conflicts of interest and recommend the selected supplier based on value for money, compliance and capacity to deliver.

Panel member	Role	Signature	Date

Annex G: Sources Consulted

- Water Abundance Africa Strategic Plan 2026-2030.
- Financial Policy Management of NGO ACDC sample.
- 2020 Finance Sample Policy and Procedures document.
- WAA company profile and organisational information available in the working file context.

This policy is a draft management document. It should be reviewed by WAA leadership, legal counsel/auditor where appropriate, and formally approved by the Board before use.

PART 2

HUMAN RESOURCE POLICY AND PROCEDURES

Operational Manual Section



WATER ABUNDANCE AFRICA HUMAN RESOURCE POLICY AND PROCEDURES

2026-2030

Strategic Anchor

Water • Climate • Health • Prosperity

People-centred systems for ethical, inclusive and high-performing institutional delivery.

Draft for Board Review and Approval

Prepared: July 2026

Document Control and Approval

Item	Details
Organisation	Water Abundance Africa (WAA)
Document title	Human Resource Policy and Procedures
Strategic period	2026-2030
Version	Draft Version 1.0
Effective date	[Insert effective date after Board approval]
Review cycle	Every two years, or earlier where required by law, donor requirements or Board direction
Policy owner	Executive Director / Human Resources and Administration Function
Approving authority	Board of Directors
Applicable geography	Kenya operations and other WAA programme locations, subject to local labour law

Approval Signatures

Role	Name	Signature	Date
Board Chairperson			
Executive Director			
Finance, Audit & Risk Committee Chair			
Governance, Human Capital & Ethics Committee Chair			

Important legal note

This policy is an institutional HR framework based on WAA documents and sample policy structures. Before formal adoption, WAA should have the document reviewed against current Kenyan labour, tax, occupational safety, data protection, NGO and donor compliance requirements.

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1. Purpose, Policy Statement and Scope

1.1 Purpose

This Human Resource Policy and Procedures document establishes the standards by which Water Abundance Africa recruits, manages, supports, protects and develops its employees, consultants, volunteers, interns, fellows and representatives. It is intended to promote fairness, transparency, accountability, safeguarding, professional conduct and effective delivery of WAA's Climate-Water-Health Nexus mandate.

1.2 Policy Statement

WAA shall manage human resources in a manner that attracts competent people, strengthens institutional capacity, protects staff and communities, promotes inclusion, supports measurable performance and upholds the highest standards of integrity. All HR decisions shall be guided by merit, fairness, equity, non-discrimination, operational needs, budget availability, donor compliance and applicable law.

1.3 Scope

This policy applies to all WAA offices, projects and field operations. It applies to employees on permanent, fixed-term, part-time, casual or project-based contracts, as well as consultants, volunteers, interns, fellows, secondees, Board members and other representatives when acting on behalf of WAA.

1.4 Relationship with Other Policies

This policy should be read together with WAA's Finance Policy and Procedures, Procurement Policy, Safeguarding Policy, Code of Conduct, Data Protection Policy, Travel Policy, Security Guidelines, Anti-Fraud and Whistleblowing Policy, and donor-specific agreements. Where donor rules are stricter, the stricter requirement shall apply, provided it does not conflict with applicable law.

2. Institutional Values and HR Principles

WAA's human resource management reflects its institutional strategy as a Climate-Water-Health Nexus Platform and its commitment to water security, climate resilience, health, prosperity, inclusion and sustainable development.

2.1 Core Values Applied to People Management

Value	HR meaning
Integrity	Ethical conduct, truthful reporting, confidentiality, accountable decision-making and responsible stewardship of resources.
Innovation	Learning, evidence use, digital transformation and continuous improvement in programme and institutional practice.
Collaboration	Respectful teamwork across staff, communities, government, academia, civil society and private-sector partners.
Inclusion	Gender equality, youth empowerment, disability inclusion and fair access to opportunity.
Sustainability	Long-term institutional capacity, staff wellbeing,

Value	HR meaning
	environmental responsibility and responsible use of resources.
Excellence	Professionalism, quality, measurable impact, continuous learning and accountability for results.

2.2 HR Operating Principles

- Merit-based recruitment and transparent selection processes.
- Equal opportunity and reasonable accommodation for persons with disabilities.
- Safe, respectful and harassment-free working environment.
- Clear roles, performance expectations and accountability lines.
- Learning, mentorship and capacity development as part of institutional strengthening.
- Confidential management of staff records and personal data.
- Zero tolerance for fraud, corruption, exploitation, harassment and abuse.
- Compliance with applicable national laws, donor requirements and relevant international good practice.

3. HR Governance and Responsibilities

WAA will maintain clear governance and management responsibilities for human resources. HR oversight supports institutional accountability, risk management, safeguarding and staff performance.

Body / role	Core HR responsibility
Board of Directors	Approves HR policies, senior leadership appointments where applicable, safeguarding commitments, annual staffing plans and major employment-related decisions requiring Board oversight.
Governance, Human Capital & Ethics Committee	Oversees Board performance, executive leadership, ethics, safeguarding, succession planning and HR policy compliance.
Finance, Audit & Risk Committee	Reviews payroll controls, staff-cost budgeting, financial risks, fraud risks and internal controls relating to staff payments.
Executive Director	Provides executive leadership, approves HR implementation, ensures compliance, approves recruitment within budget and holds managers accountable for staff performance and conduct.
Human Resources and Administration Function	Coordinates recruitment, contracts, personnel records, induction, leave, performance systems, welfare, training records, disciplinary documentation and HR reporting.
Finance Manager / Finance Officer	Processes payroll, statutory deductions, staff advances, reimbursements and payroll reconciliations in line with finance controls.

Body / role	Core HR responsibility
Line Managers	Define roles, supervise staff, approve workplans, manage performance, support wellbeing, identify risks and ensure compliance with safeguarding and field protocols.
All Staff and Representatives	Comply with WAA policies, uphold ethical conduct, protect communities and report misconduct, safeguarding concerns or financial irregularities.

4. Workforce Planning, Recruitment and Selection

4.1 Workforce Planning

Recruitment shall be based on approved organisational structure, strategic priorities, project budgets, donor agreements and operational needs. WAA shall maintain an annual staffing plan showing approved positions, funding sources, duty stations, contract duration, reporting lines and expected recruitment timelines.

4.2 Recruitment Approval

- No position shall be advertised or filled without written approval from the Executive Director and confirmation of budget availability by Finance.
- New positions must have a job description, reporting line, budget code, contract duration and selection criteria.
- Project-funded positions must be aligned with donor-approved budgets and workplans.
- Emergency or short-term hiring must be documented and later regularised through the appropriate approval process.

4.3 Recruitment Procedure

27. Prepare or update the job description and person specification.
28. Obtain recruitment approval and budget clearance.
29. Advertise internally and/or externally depending on the role and urgency.
30. Shortlist applicants using objective criteria linked to the job description.
31. Conduct interviews and, where relevant, written tests or technical assessments.
32. Complete reference checks, safeguarding checks and verification of qualifications where applicable.
33. Prepare a selection report with recommended candidate, reserve candidates and justification.
34. Issue a written offer and contract only after final approval.

4.4 Selection Standards

- Selection panels should include at least two people, including the line manager and HR or an authorised representative.
- All candidates must be assessed using the same core criteria.
- Interview notes and scores must be retained in the recruitment file.
- Conflict of interest must be declared by panel members before interviews begin.
- No candidate shall be appointed solely because of personal relationships, political influence, donor pressure or community pressure.

5. Employment Categories, Contracts and Personnel Files

5.1 Employment Categories

Category	Description
Permanent employee	Employee engaged for an open-ended role subject to continued funding, performance and organisational need.
Fixed-term employee	Employee engaged for a specified period, project, grant or assignment.
Part-time employee	Employee engaged for fewer working hours than a full-time role, with terms stated in the contract.
Casual / temporary worker	Short-term worker engaged for specific tasks, subject to applicable law and written terms.
Consultant	Independent service provider engaged under a consultancy agreement with agreed deliverables, fee and duration.
Intern / fellow / volunteer	Person engaged for learning, service, fellowship or community support under written terms and supervision.

5.2 Employment Contracts

Every employee shall receive a written contract before or at the start of employment. The contract shall include the job title, duty station, reporting line, start date, contract duration, probation period, remuneration, working hours, leave entitlements, confidentiality obligations, safeguarding obligations, notice period, benefits, donor funding limitations where applicable and applicable policies.

5.3 Personnel Files

HR shall maintain a confidential personnel file for each employee. Files may be electronic or physical and shall be stored securely with access limited to authorised persons only.

- Application documents and CV.
- Interview assessment and selection approval.
- Signed contract and job description.
- Identification, tax and statutory registration details where applicable.
- Emergency contact information.
- Leave records, training records and performance appraisals.
- Signed Code of Conduct, Safeguarding and Conflict of Interest declarations.
- Disciplinary, grievance or incident records, where applicable.
- Exit clearance and final settlement documentation.

6. Equal Opportunity, Inclusion and Non-Discrimination

WAA is committed to an inclusive workplace where opportunities are available fairly and decisions are based on competence, conduct, performance and organisational need. WAA shall not discriminate on the basis of gender, age, disability, ethnicity, religion, marital status, pregnancy, health status, political opinion, social origin or any other protected ground under applicable law.

6.1 Inclusion Measures

- Recruitment advertisements shall encourage qualified women, youth and persons with disabilities to apply where appropriate.
- Reasonable accommodation shall be considered for staff and candidates with disabilities.
- Workplace behaviour shall respect dignity, cultural diversity and community context.
- Staff involved in community work shall apply gender-sensitive, child-sensitive and disability-inclusive approaches.
- WAA shall mainstream inclusion in training, leadership development, field planning and safeguarding.

7. Induction, Probation and Confirmation

7.1 Induction

All new staff and representatives shall receive induction appropriate to their role. Induction should occur within the first month of engagement and shall be documented.

- WAA vision, mission, values and strategic priorities.
- Job description, reporting line and workplan expectations.
- Finance, procurement, travel and asset procedures.
- Safeguarding, PSEA, child protection and complaints reporting.
- Data protection, confidentiality and information security.
- Health, safety, security and field-work protocols.
- Performance management and learning expectations.

7.2 Probation

New employees may be placed on probation as stated in their contract. During probation, the line manager shall set clear objectives, provide feedback and document progress. Confirmation shall be based on satisfactory performance, conduct and policy compliance. Probation may be extended or employment may be terminated in accordance with the contract and applicable law.

8. Working Hours, Attendance and Field Work

Working hours, rest days, public holidays and overtime shall be managed in accordance with employment contracts, approved workplans and applicable law. Field operations may require flexible scheduling, but staff wellbeing, safety and reasonable rest must be observed.

8.1 Attendance and Timesheets

- Employees shall report to work and complete tasks according to agreed schedules.
- Project staff may be required to submit timesheets or activity logs for donor compliance.
- Absence must be approved in advance except in emergencies or illness.
- Repeated lateness, unauthorised absence or falsification of attendance records may lead to disciplinary action.

8.2 Field Work

- Field plans must be approved by the line manager and include objectives, location, dates, team members, transport and safety considerations.
- Staff must comply with community entry protocols, safeguarding requirements and respectful engagement standards.
- Incident, security, vehicle or safeguarding concerns must be reported immediately through agreed channels.
- Field reports and supporting documents must be submitted after field assignments.

9. Remuneration, Payroll, Benefits and Statutory Compliance

9.1 Salary Administration

WAA shall maintain a transparent salary administration process based on approved budgets, job grades or contract terms, donor restrictions and organisational affordability. Salaries shall be paid through bank transfer or other approved traceable method unless exceptional circumstances are approved in writing.

9.2 Payroll Controls

- Payroll shall be prepared by Finance and reviewed by the authorised approving officer before payment.
- Payroll changes must be supported by approved documentation such as appointment letters, contract amendments, leave without pay, salary adjustment letters or separation documents.
- Payslips shall show gross pay, deductions, benefits and net pay.
- Statutory deductions and employer obligations shall be handled in accordance with applicable law.
- Payroll records shall be reconciled monthly and retained securely.

9.3 Benefits

Benefits may include statutory benefits, medical cover, pension or retirement contributions, insurance, airtime, field allowances, training support or other benefits approved by the Board or included in employment contracts. Benefits shall be applied consistently within grade, contract type, budget and donor rules.

10. Leave Management

WAA shall provide leave in accordance with applicable law, contracts and approved organisational schedules. Leave must be planned and approved to balance staff wellbeing with programme continuity.

Leave type	Policy approach
Annual leave	Taken with prior approval. Entitlement shall be stated in the contract and must meet or exceed statutory requirements.
Sick leave	Granted where an employee is medically unfit for work. Medical evidence may be required according to HR procedures.
Maternity / paternity / parental leave	Granted in accordance with applicable law and the employee's contract.
Compassionate leave	May be granted for bereavement or serious family emergencies, subject to approval.
Study / examination leave	May be granted where the course is relevant to WAA work and approved by management.
Unpaid leave	May be approved by the Executive Director in exceptional circumstances where operations allow.
Public holidays	Observed according to the applicable country of employment or duty station.

10.1 Leave Records

HR shall maintain leave records for all staff. Leave balances should be reviewed periodically and communicated to staff. Leave not approved in writing shall be treated as unauthorised absence unless justified by emergency circumstances.

11. Performance Management, Learning and Capacity Development

11.1 Performance Planning

Every employee shall have clear performance expectations linked to their job description, project workplan and WAA strategic priorities. Performance objectives should be specific, measurable, realistic, time-bound and reviewed regularly.

11.2 Performance Reviews

- Line managers shall hold regular supervision meetings and document agreed actions.
- Formal performance reviews shall be conducted at least annually, and more frequently for probationary or project-funded staff where required.
- Reviews shall cover results, quality, teamwork, safeguarding, ethics, learning, innovation and compliance with policies.
- Performance ratings shall be evidence-based and discussed with the employee.
- Poor performance shall be addressed through coaching, written improvement plans and fair review before disciplinary action is considered.

11.3 Learning and Capacity Development

WAA shall invest in staff capacity to support technical excellence, climate-finance readiness, digital transformation, safeguarding, financial controls, project management and community-centred delivery. Training priorities shall be informed by WAA's strategy, donor requirements, performance reviews and risk assessments.

- Mandatory training may include safeguarding, PSEA, anti-fraud, data protection, finance controls, procurement, safety and security.
- Technical training may include WASH, water systems, climate resilience, renewable energy, MEL, data, GIS, AI tools, community engagement and policy advocacy.
- Training records shall be retained in personnel files or an HR training register.
- Employees attending training may be required to share learning with colleagues.

12. Code of Conduct, Ethics and Conflict of Interest

All staff and representatives shall uphold WAA's reputation through honesty, respect, professionalism, accountability and responsible stewardship of resources. Staff shall sign the Code of Conduct and Conflict of Interest Declaration on appointment and annually thereafter.

12.1 Expected Conduct

- Act with integrity, respect and transparency in all work-related duties.
- Use WAA resources only for authorised purposes.
- Avoid conflicts of interest and declare any actual, potential or perceived conflict immediately.
- Protect confidential information and personal data.
- Treat colleagues, partners, suppliers, community members and beneficiaries with dignity.
- Do not solicit or accept bribes, kickbacks, gifts or favours that could influence decisions.
- Do not engage in fraud, corruption, exploitation, harassment, intimidation, retaliation or abuse of power.
- Report suspected misconduct, financial irregularities or safeguarding concerns through the appropriate channels.

12.2 Conflict of Interest

A conflict of interest occurs where personal, family, business, political or other interests may influence or appear to influence a person's judgement in WAA matters. Staff must declare conflicts involving recruitment, procurement, grants, supplier selection, community targeting, project implementation, finance approvals or any other organisational decision.

13. Safeguarding, PSEA and Protection from Harassment

WAA has zero tolerance for sexual exploitation and abuse, sexual harassment, child abuse, abuse of vulnerable adults, discrimination, bullying, intimidation, retaliation and any misuse of power. Safeguarding obligations apply to staff, consultants, volunteers, interns, fellows, Board members, suppliers and partners when acting for or with WAA.

13.1 Safeguarding Requirements

- All staff must complete safeguarding induction and sign safeguarding commitments.
- Staff must never exploit, abuse or harass programme participants, children, community members, colleagues or partners.
- Any concern involving children, vulnerable adults, sexual exploitation, abuse or harassment must be reported immediately through confidential reporting channels.
- Managers must act promptly to protect affected persons, preserve confidentiality and refer matters to authorised safeguarding focal persons.
- Retaliation against a complainant, witness or whistleblower is prohibited.
- Safeguarding incidents shall be managed with survivor-centred, child-sensitive, confidential and timely procedures.

13.2 Reporting Channels

WAA shall maintain accessible reporting channels, including line management, HR, the safeguarding focal person, the Executive Director, the Governance, Human Capital & Ethics Committee or an independent channel where available. Complaints may be made verbally or in writing and shall be handled confidentially.

14. Health, Safety, Security and Duty of Care

WAA shall take reasonable measures to protect staff health, safety and security in offices, field sites, travel, training venues and community operations. Staff shall follow safety instructions, use protective equipment where required and report unsafe conditions or incidents.

14.1 Duty of Care Measures

- Risk assessment before field activities in remote, climate-exposed or security-sensitive areas.
- Approved travel plans, emergency contacts and communication protocols for field teams.
- Safe transport arrangements and responsible vehicle use.
- Provision of protective equipment where relevant to technical or field duties.
- Incident reporting for accidents, injuries, illness, security threats, safeguarding concerns and near misses.
- Reasonable support for staff wellbeing, stress management and psychosocial referral where possible.

15. Travel, Per Diem, Advances and Reimbursable Expenses

Travel and field expenses shall be managed in accordance with approved workplans, budgets, donor rules and WAA finance procedures. Staff must seek approval before travel and account for advances within the required timeline.

- Travel must be authorised before departure using a travel request or approved field plan.
- Per diem and accommodation rates shall be approved by management and documented in the applicable schedule.
- Staff advances must be accounted for with receipts, activity reports and unspent balances returned.
- No new advance shall be issued to a staff member with overdue unaccounted funds except by written exception approved by the Executive Director and Finance.
- Expense claims must be supported by receipts, invoices or approved exception notes and must relate to authorised WAA activities.

16. ICT, Data Protection, Confidentiality and Records

Staff shall protect WAA information, donor information, personal data, community data, research data and confidential organisational records. Digital systems shall be used responsibly and access shall be limited according to role.

16.1 Information Security

- Use strong passwords and do not share login credentials.
- Store official documents in approved storage locations or cloud systems.
- Do not disclose confidential information without authorisation.
- Protect personal data collected from staff, partners, children, vulnerable adults and community members.
- Report suspected data loss, cyber incidents or unauthorised access immediately.
- Return all WAA devices, files and records during exit clearance.

16.2 Records Retention

HR records shall be retained in accordance with legal, donor and organisational requirements. Sensitive records, including disciplinary, medical, safeguarding and grievance files, shall have restricted access and be stored separately where appropriate.

17. Grievance Handling and Disciplinary Procedure

17.1 Grievance Procedure

Employees have the right to raise workplace concerns without fear of retaliation. Grievances may relate to supervision, terms of employment, discrimination, harassment, safety, workload, interpersonal conflict or policy application.

35. Informal resolution: The employee may first discuss the matter with the line manager, unless inappropriate.
36. Written grievance: If unresolved, the employee may submit a written grievance to HR or the Executive Director.
37. Acknowledgement: HR shall acknowledge receipt and explain next steps.
38. Review: WAA shall review facts, interview relevant persons and document findings.
39. Decision: A written decision or resolution plan shall be communicated to the employee.
40. Appeal: The employee may appeal according to the escalation route approved by WAA.

17.2 Disciplinary Procedure

Disciplinary action shall be fair, proportionate, evidence-based and documented. WAA shall give employees an opportunity to respond before decisions are made, except where immediate suspension is necessary to protect people, evidence, funds, property or organisational integrity.

Misconduct category	Examples
Minor misconduct	Lateness, poor documentation, failure to follow reasonable instructions, minor breach of procedures.
Serious misconduct	Repeated absence, negligence, misuse of resources, breach of confidentiality, conflict of interest not declared.
Gross misconduct	Fraud, theft, corruption, sexual exploitation or abuse, harassment, violence, serious safeguarding breach, falsification of records, serious insubordination, serious safety breach.

- Possible outcomes include coaching, verbal warning, written warning, final warning, suspension, demotion where lawful, termination, referral to authorities or other lawful action.
- Safeguarding, fraud and corruption cases may require immediate escalation to the Executive Director, Board committee, donor or relevant authority depending on severity and contractual requirements.
- Records of disciplinary matters shall be kept confidential and retained in the personnel file or restricted investigation file.

18. Consultants, Volunteers, Interns and Fellows

Consultants, volunteers, interns and fellows contribute to WAA's technical, community and learning agenda. They must be engaged through written terms and must comply with WAA safeguarding, confidentiality, data protection, safety and conflict of interest requirements.

18.1 Consultants

- Consultants shall have written terms of reference, deliverables, timeframe, fee, payment schedule and reporting line.
- Consultancy payments shall be tied to satisfactory deliverables and finance documentation.
- Consultants are not employees unless expressly stated in a contract and must manage their own professional obligations unless otherwise required by law or contract.
- Consultants working with children, vulnerable adults or sensitive data must undergo safeguarding briefing and sign declarations.

18.2 Volunteers, Interns and Fellows

- Engagement must be based on clear learning or service objectives and approved supervision.
- Written agreements shall define duration, duties, allowances if any, insurance or safety arrangements, confidentiality and conduct obligations.
- Volunteers, interns and fellows shall not replace core paid staff in a way that undermines fair labour practice.
- Certificates or reference letters may be issued based on satisfactory completion and conduct.

19. Separation, Exit and Clearance

Employment or engagement may end through resignation, end of contract, retirement, redundancy, termination for cause, mutual separation, death or other lawful reason. Separation shall be handled respectfully, confidentially and in accordance with the contract and applicable law.

19.1 Notice and Final Dues

- Notice periods shall be as stated in the contract or applicable law.
- Final dues shall be calculated by Finance based on salary earned, leave balance, advances, loans, statutory deductions, benefits and any recoverable organisational property or funds.
- All WAA assets, documents, identification, equipment, passwords, data and records must be returned before final clearance.
- Where appropriate, HR shall conduct an exit interview to identify lessons for organisational improvement.

20. Policy Implementation, Monitoring and Review

The Executive Director and HR function are responsible for implementing this policy and ensuring that managers and staff understand their responsibilities. HR shall maintain registers for recruitment, contracts, leave, training, grievances, disciplinary matters, safeguarding declarations and policy acknowledgements.

20.1 Review

This policy shall be reviewed at least every two years, or earlier if there are changes in law, donor requirements, organisational structure, safeguarding standards, programme risk or Board direction. Any amendments shall be approved by the Board of Directors or delegated authority.

20.2 Staff Acknowledgement

All staff and representatives shall sign an acknowledgement confirming that they have received, read, understood and agree to comply with this policy and related policies.

Annexes: HR Templates and Forms

The following templates support implementation of this policy. WAA may adapt them to digital forms or donor-specific formats.

Annex 1: Recruitment Approval Form

Field	Details / Completion
Position title	
Department / project	
Duty station	
Contract type and duration	
Budget line / donor code	
Reason for recruitment	New role / replacement / project surge / other
Requested by	
Finance budget confirmation	
Executive Director approval	

Annex 2: Interview Scoring Sheet

Field	Details / Completion
Candidate name	
Position	
Panel members	
Technical competence score	/30
Relevant experience score	/25
Values and safeguarding score	/20
Communication and teamwork score	/15
Overall fit score	/10
Total score	/100
Recommendation	Appoint / Reserve / Do not appoint
Panel comments	

Annex 3: Staff Induction Checklist

Field	Details / Completion
Employee name	
Position	
Start date	
Contract and job description explained	Yes / No
WAA strategy and values explained	Yes / No
Finance and procurement procedures briefed	Yes / No
Safeguarding and PSEA briefing completed	Yes / No
Data protection and confidentiality explained	Yes / No
Field safety and security briefing completed	Yes / No
Supervisor and workplan confirmed	Yes / No
Employee signature	
HR signature	

Annex 4: Leave Request Form

Field	Details / Completion
Employee name	
Department / project	
Leave type	Annual / sick / maternity / paternity / compassionate / study / unpaid / other
Leave start date	
Leave end date	
Number of working days	
Handover arrangements	
Employee signature	
Supervisor approval	
HR leave balance confirmation	

Annex 5: Performance Review Form

Field	Details / Completion
Employee name	
Position	
Review period	
Key objectives achieved	
Quality of work	
Teamwork and communication	
Policy compliance and safeguarding	
Innovation and learning	
Challenges and support needed	
Training needs	
Overall rating	
Employee comments	
Supervisor comments	
Next review date	

Annex 6: Conflict of Interest Declaration

Field	Details / Completion
Name	
Position / role	
Declaration	I declare that I have disclosed any actual, potential or perceived conflict of interest related to my WAA duties.
Details of conflict, if any	
Mitigation agreed	
Signature	
Date	

Annex 7: Safeguarding / Incident Report Form

Field	Details / Completion
Date and time of report	
Reported by	
Incident type	Safeguarding / harassment / safety / fraud / security / data / other
Location	
Persons affected	
Description of incident or concern	
Immediate action taken	
Referral required	Yes / No
Confidential follow-up officer	
Next steps and date	

Annex 8: Staff Exit and Clearance Form

Field	Details / Completion
Employee name	
Position	
Last working day	
Reason for exit	
Handover completed	Yes / No
Organisational property returned	Yes / No
Data/files transferred	Yes / No
Outstanding advances or claims cleared	Yes / No
Leave balance and final dues confirmed	Yes / No
Exit interview completed	Yes / No
HR clearance	
Finance clearance	

Field	Details / Completion
Executive Director approval	

PART 3

SAFEGUARDING / CHILD & VULNERABLE ADULTS PROTECTION POLICY

Operational Manual Section

WATER ABUNDANCE AFRICA

Water • Climate • Health • Prosperity

SAFEGUARDING / CHILD & VULNERABLE ADULTS PROTECTION POLICY

2026–2030

A policy for preventing, reporting and responding to abuse, exploitation, neglect, harassment and harm affecting children and vulnerable adults in WAA programmes, partnerships and operations.

Document status	Draft for Board review and adoption
Policy owner	Governance, Human Capital & Ethics Committee
Operational owner	Executive Director / Safeguarding Focal Person

Effective date	To be approved by the Board
Review cycle	Annual review or earlier where required by law, donor requirements or safeguarding incidents

Prepared for Water Abundance Africa. This draft should be reviewed by WAA leadership, legal counsel and the Board before formal adoption.

Document Control

Organisation	Water Abundance Africa (WAA)
Policy title	Safeguarding / Child & Vulnerable Adults Protection Policy
Strategic alignment	Water • Climate • Health • Prosperity; Climate–Water–Health Nexus Platform
Policy period	2026–2030
Applies to	Board members, employees, consultants, volunteers, interns, visitors, partners, suppliers, contractors, grantees and any person representing WAA
Main contact / Safeguarding Focal Person	To be designated by the Executive Director
Accountable committee	Governance, Human Capital & Ethics Committee, reporting to the Board of Directors
Related policies	Human Resource Policy; Finance Policy; GESI Policy; Environmental and Social Safeguards Policy; Anti-Fraud, Corruption & Whistleblowing Policy; Data Protection and Communications procedures
Legal jurisdiction	Republic of Kenya and applicable donor, partner and international safeguarding standards

Note: This document is a governance and operational policy. It does not replace legal advice. Where this policy conflicts with Kenyan law, donor conditions or statutory child protection directions, the stricter protection standard shall apply.

Approval

Role	Name	Signature	Date
Board Chairperson			
Executive Director			
Safeguarding Focal Person			

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1. Policy Statement

Water Abundance Africa (WAA) is committed to providing a safe, respectful and protective environment for children and vulnerable adults who come into contact with its programmes, staff, partners, visitors and representatives. WAA recognises that water security, climate resilience, health, education, food systems and community development must be delivered without exposing children, vulnerable adults or communities to abuse, exploitation, neglect, discrimination, harassment or any other form of harm.

WAA adopts a zero-tolerance approach to child abuse, sexual exploitation and abuse, sexual harassment, trafficking, forced labour, harmful practices, neglect, bullying, emotional abuse, misuse of images or data, and any conduct that violates the dignity, safety or rights of children and vulnerable adults. Every person working with or representing WAA has a duty to prevent harm, report concerns promptly and support survivor-centred responses.

This policy aligns with WAA's institutional strategy to operate as a Climate–Water–Health Nexus Platform and to uphold integrity, inclusion, transparency, accountability, safeguarding and responsible stewardship across all operations.

Core commitment: Safeguarding is everyone's responsibility. No WAA programme result, donor target, field deadline or operational pressure may override the safety, dignity and best interests of a child or vulnerable adult.

2. Purpose and Objectives

The purpose of this policy is to establish clear rules, responsibilities and procedures for preventing and responding to safeguarding risks affecting children and vulnerable adults in WAA's work.

- Define WAA's safeguarding standards and expected behaviour for all staff, representatives and partners.
- Prevent harm through safe recruitment, safe programming, risk assessment, training and accountability systems.
- Ensure that safeguarding concerns are reported, assessed, referred and managed promptly, confidentially and lawfully.
- Protect children and vulnerable adults from abuse, exploitation, neglect, violence, harmful practices and discrimination.
- Support survivor-centred responses that prioritise safety, dignity, confidentiality, informed consent, non-discrimination and access to services.
- Align WAA's operations with Kenyan law, donor standards and international good practice relevant to child protection, vulnerable adult protection and safeguarding.

3. Scope of Application

This policy applies to all WAA activities and relationships, whether implemented directly or through partners, contractors, consultants, community structures, schools, public institutions, research institutions or private-sector collaborators.

Applies to	Examples
People	Board members, employees, volunteers, interns, consultants, enumerators, drivers, technical teams, visitors, photographers, researchers and anyone representing WAA.
Partners	Community-based organisations, schools, county partners, CSOs, universities, private contractors, suppliers, grantees and consortium members.
Programmes	Water projects, WASH activities, school resilience hubs, climate-health activities, youth training, community meetings, field surveys, digital platforms, research and monitoring.
Locations	WAA offices, field sites, schools, health facilities, communities, online platforms, events, vehicles and accommodation used during WAA work.

4. Legal and Institutional Framework

This policy shall be interpreted in line with the Constitution of Kenya, Kenyan statutes, relevant regulations, donor safeguarding requirements and recognised international safeguarding practice. It is particularly guided by the legal and policy instruments below.

Instrument	Safeguarding relevance	WAA policy implication
Constitution of Kenya, 2010	Protects equality, dignity, privacy, health, children's rights and the rights of persons with disabilities.	All WAA activities must uphold dignity, non-discrimination, child protection, privacy and reasonable accommodation.
Children Act, Cap. 141 / Children Act, 2022	Provides for children's rights, best interests, care and protection, child abuse, child trafficking and child welfare structures.	The best interests of the child are the primary consideration in all WAA decisions affecting children.
Sexual Offences Act, Cap. 63A	Defines and criminalises sexual offences and unlawful sexual acts.	Any suspected sexual offence must be treated as a serious safeguarding incident and referred through lawful channels.
Counter-Trafficking in Persons Act, Cap. 61	Addresses trafficking, exploitation, forced labour, sexual exploitation and child trafficking.	WAA prohibits trafficking, forced labour, exploitative recruitment and all forms of exploitation.
Victim Protection Act, Cap. 79A	Provides for protection, information, support services and special protection for vulnerable victims.	WAA response processes must be survivor-centred and referral-oriented.
Protection Against Domestic Violence Act, Cap. 151	Provides relief and protection for victims of domestic violence, including children and dependent persons.	WAA field teams must identify and safely refer domestic violence concerns arising during community work.
Data Protection Act, Cap. 411C	Regulates personal data, including processing of children's data with parent/guardian consent and best-	WAA must obtain appropriate consent, limit data collection and secure records, images and stories.

Instrument	Safeguarding relevance	WAA policy implication
	interests safeguards.	
Employment Act, Cap. 226	Requires non-discrimination in employment and sexual harassment policy for applicable employers.	WAA shall maintain a safe workplace free from discrimination, harassment and retaliation.
Occupational Safety and Health Act, Cap. 236A	Provides for safety, health and welfare of workers and persons lawfully present at workplaces.	WAA must manage workplace and field-site health and safety risks affecting staff, children and vulnerable adults.
Basic Education Act, No. 14 of 2013	Provides principles on child protection, inclusion, non-discrimination and prohibition of corporal punishment in basic education settings.	WAA school programmes must comply with school safeguarding requirements and education sector protection standards.
Persons with Disabilities Act, No. 4 of 2025	Provides for protection and promotion of rights of persons with disabilities.	WAA must provide reasonable accommodation, accessibility and disability-inclusive safeguarding.

Legal review note: WAA should periodically update this section to reflect amendments, regulations, county-specific referral pathways, donor requirements and guidance issued by relevant government bodies.

5. Definitions

Term	Meaning for this policy
Child	Any person below the age of 18 years.
Vulnerable adult	A person aged 18 or above who, because of disability, illness, age, displacement, dependence, trauma, poverty, social exclusion, crisis or other vulnerability, may be unable to protect themselves from abuse, exploitation or neglect.
Safeguarding	The responsibility to prevent, identify, report and respond to harm, abuse, exploitation, neglect and unsafe conduct in WAA operations.
Abuse	Physical, emotional, sexual, economic, online or institutional harm, including acts or omissions that cause or risk harm.
Exploitation	Using a person's vulnerability, dependence or trust for sexual, financial, labour, political or other gain.
Neglect	Failure to protect or provide necessary care, support, supervision or safe conditions where WAA has a duty of care.
Sexual exploitation and abuse (SEA)	Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting from sexual exploitation of another.
Sexual harassment	Unwelcome conduct of a sexual nature that creates an intimidating, hostile, degrading, humiliating or offensive environment or affects employment or participation.
Survivor / victim	A person who has experienced or is alleged to have experienced abuse, exploitation, neglect or violence. The preferred term shall be guided by the person's choice and legal context.
Safeguarding concern	Any suspicion, disclosure, allegation, observation or incident suggesting that a child or vulnerable adult is at risk of harm or has been harmed.
Do no harm	A principle requiring WAA to avoid actions that may

Term	Meaning for this policy
	increase risk, stigma, retaliation, trauma or exposure of affected persons.

6. Safeguarding Principles

- Best interests of the child: All decisions affecting a child must prioritise the child's safety, welfare, development, participation and protection.
- Survivor-centred response: WAA will prioritise safety, dignity, confidentiality, respect, informed consent and access to support.
- Zero tolerance for abuse and exploitation: WAA prohibits all forms of abuse, sexual exploitation and abuse, harassment, trafficking, child labour and neglect.
- Non-discrimination and inclusion: Protection applies equally regardless of age, sex, gender, disability, religion, ethnicity, health status, nationality, migration status, social origin or any other status.
- Participation and voice: Children and vulnerable adults should be heard in safe and age-appropriate ways in matters affecting them.
- Accountability and transparency: WAA will maintain clear reporting channels, documented decisions, internal controls and Board oversight.
- Confidentiality and data minimisation: Information will be shared strictly on a need-to-know basis and handled lawfully and securely.
- Local ownership and lawful referral: WAA will work with families, schools, community structures and statutory authorities where safe and appropriate.

7. Governance and Responsibilities

Role / body	Safeguarding responsibilities
Board of Directors	Approve this policy; provide fiduciary and ethical oversight; ensure resources for safeguarding; receive serious incident reports through appropriate channels; ensure independent review where senior leadership is implicated.
Governance, Human Capital & Ethics Committee	Oversee safeguarding, ethics, staff conduct, Board and executive accountability, policy review, training compliance and serious case learning.
Executive Director	Ensure policy implementation; designate a Safeguarding Focal Person; ensure reporting pathways, training, safe recruitment and partner compliance; take urgent protective action where required.
Safeguarding Focal Person	Maintain safeguarding risk register, training records, reporting channels, referral directory and case log; receive concerns; coordinate response while maintaining confidentiality.
Human Resources / Administration	Embed safeguarding in recruitment, contracts, onboarding, staff files, performance management, disciplinary processes and exit procedures.
Programme Managers	Conduct project safeguarding risk assessments; ensure safe field plans, child-safe activities, community sensitisation and partner compliance.

Role / body	Safeguarding responsibilities
Finance and Procurement	Include safeguarding clauses in procurement and grants; conduct supplier/partner due diligence; withhold or terminate contracts for serious non-compliance.
MEL, Communications and Digital Teams	Ensure ethical data collection, safe images, consent, privacy, secure records, survivor confidentiality and do-no-harm storytelling.
All staff, representatives and partners	Comply with this policy and Code of Conduct; prevent harm; report concerns within 24 hours or immediately where there is imminent risk.

8. Safeguarding Code of Conduct

Every person covered by this policy shall sign and comply with WAA's Safeguarding Code of Conduct. Breach of the Code may lead to disciplinary action, termination of contract and referral to statutory authorities.

8.1 Required Conduct

- Treat all children and vulnerable adults with dignity, respect and care.
- Use positive, non-violent and age-appropriate communication.
- Maintain professional boundaries at all times.
- Use inclusive language and make reasonable adjustments for persons with disabilities and other vulnerabilities.
- Ensure that any one-on-one interaction is necessary, authorised, observable where possible and documented where risk exists.
- Obtain informed consent and child assent, as applicable, before taking photographs, videos, interviews or personal stories.
- Report all safeguarding concerns promptly even where facts are incomplete.
- Cooperate with safeguarding reviews, investigations and lawful referrals.

8.2 Prohibited Conduct

- Do not physically, emotionally, sexually or economically abuse any child or vulnerable adult.
- Do not engage in sexual activity or sexualised communication with any person under 18, regardless of perceived consent or local custom.
- Do not exchange money, work opportunities, aid, gifts, transport, grades, project benefits or services for sex, sexual favours, relationships or personal advantage.
- Do not use corporal punishment, humiliation, intimidation, threats, bullying or degrading treatment.
- Do not use WAA vehicles, accommodation, offices, digital platforms or events to exploit or harm any person.
- Do not take or share images of children or vulnerable adults that are undignified, identifying without consent, sexualised, exploitative or likely to increase risk.
- Do not privately contact children through personal phones, social media or messaging platforms unless authorised for a legitimate programme purpose and documented.
- Do not ignore, conceal, dismiss, delay or attempt to personally settle a safeguarding concern.
- Do not retaliate against any person who reports a concern in good faith.

9. Prevention and Safe Programming Measures

WAA will integrate safeguarding into the full programme cycle: design, budgeting, partner selection, implementation, monitoring, reporting, closure and learning.

9.1 Safeguarding Risk Assessment

Every programme or activity involving children or vulnerable adults shall include a safeguarding risk assessment before implementation. The assessment shall consider physical safety, power imbalances, gender and disability risks, privacy, transport, accommodation, digital engagement, field security, complaints pathways and referral services.

9.2 Child- and Vulnerable-Adult-Safe Field Practice

- Use the two-adult principle where practical when engaging children or vulnerable adults.
- Hold activities in safe, accessible and visible spaces.
- Ensure separate and secure sanitation arrangements where relevant, especially for girls, women and persons with disabilities.
- Document parental/guardian consent and child assent for activities involving children.
- Avoid transporting a child or vulnerable adult alone unless there is an emergency or written authorisation and a risk mitigation note.
- Ensure safeguarding messages are available in languages and formats appropriate to the community.
- Provide safe complaints channels at community and school level.

9.3 Safe Communications, Images and Stories

- Use images and stories only where informed consent has been obtained and the use protects dignity and privacy.
- Do not disclose full names, precise locations, school details or sensitive health/protection information where this could expose the person to harm.
- Do not offer payment or benefits for a child's story or image in a way that creates pressure or exploitation.
- Store media and consent forms securely and remove images upon justified request, where practical and lawful.

10. Safe Recruitment, Induction and Training

WAA shall apply safe recruitment and onboarding practices for roles that involve contact with children, vulnerable adults, communities, data, programme benefits or positions of trust.

- Job adverts and terms of reference shall include WAA's safeguarding commitment.
- Applicants shall be screened for suitability, relevant experience and values alignment.
- Reference checks shall include questions on conduct, integrity and suitability to work with communities, children or vulnerable adults.
- Where appropriate and lawful, police clearance, professional registration checks or other background checks shall be required.
- All staff, consultants, volunteers, interns and Board members shall sign the Safeguarding Code of Conduct before starting work.

- Safeguarding induction shall be mandatory before field deployment or unsupervised programme contact.
- Annual refresher training shall be conducted, with additional training for managers, field teams, drivers, enumerators and communications staff.

11. Reporting and Response Procedure

Any safeguarding concern must be reported as soon as possible. Where there is imminent danger, staff must first take reasonable steps to secure immediate safety and obtain emergency medical, police or child protection support as appropriate.

Step	Action	Timing
1. Ensure immediate safety	Remove the person from immediate danger where safe to do so; seek urgent medical, psychosocial, police, children services or protection support as necessary.	Immediately
2. Listen and reassure	Listen calmly; do not blame, interrogate, promise secrecy or investigate. Explain that information may need to be shared with safeguarding or statutory authorities to protect safety.	Immediately
3. Report internally	Notify the Safeguarding Focal Person. If the concern involves the Focal Person, report to the Executive Director or Board-designated safeguarding contact.	Within 24 hours; immediately if serious
4. Record	Complete the Safeguarding Incident Reporting Form using factual information only. Avoid speculation and preserve any relevant evidence.	Within 24 hours
5. Assess and refer	Safeguarding Focal Person and authorised leadership assess risk, referral needs, conflict of interest and duty to report to authorities or donors.	Within 48 hours
6. Case management	Assign case owner, maintain confidential log, implement survivor-centred support and determine investigation or disciplinary steps.	Promptly and continuously
7. Close and learn	Document outcome, lessons learned, prevention measures and any policy or training updates required.	After case resolution

11.1 Reporting Channels

WAA shall maintain several accessible reporting channels, including at minimum:

- Safeguarding Focal Person: name, phone and email to be displayed in WAA offices, field sites and partner documents.
- Executive Director or designated senior manager.
- Board-designated safeguarding contact where allegations involve senior leadership.
- Community feedback boxes, help desks or safe feedback mechanisms where appropriate.

- Statutory authorities such as the police, County Children Officer or relevant protection agency where a child, vulnerable adult or crime is involved.

11.2 Non-Retaliation

WAA prohibits retaliation against any person who reports a safeguarding concern in good faith, supports a survivor, participates in an investigation or refuses to participate in unsafe conduct. Retaliation shall be treated as misconduct.

12. Case Management and Investigations

All safeguarding cases shall be managed with confidentiality, neutrality, timeliness, respect and survivor-centred decision-making. WAA shall not interfere with police, children services, medical or judicial processes.

12.1 Case Management Standards

- Prioritise safety and immediate protection needs.
- Avoid re-traumatisation, repeated interviews or unnecessary disclosure.
- Respect informed consent except where statutory reporting or imminent risk requires action.
- Use trained or authorised personnel for interviews and investigations.
- Manage conflicts of interest by excluding implicated persons from decision-making.
- Document decisions, referrals and evidence securely.
- Notify donors or partners only where required by agreement and without unnecessary disclosure of identities.

12.2 Investigation Procedure

41. Preliminary assessment: Determine whether the concern falls under safeguarding, whether immediate referral is required and whether any person should be suspended or reassigned pending review.
42. Terms of reference: Define allegations, scope, investigators, confidentiality rules, timelines and safeguarding measures.
43. Evidence collection: Collect records, witness information, media, documents and relevant communications lawfully and securely.
44. Interview process: Use trauma-informed and age-appropriate approaches. Children should only be interviewed by trained personnel and with appropriate safeguards.
45. Findings and decision: Provide findings to authorised decision-makers. Apply disciplinary, contractual, referral or corrective actions based on evidence and due process.
46. Learning: Update risk assessments, training, partner controls and project procedures to prevent recurrence.

13. Confidentiality, Data Protection and Communications

Safeguarding information is sensitive and shall be handled strictly on a need-to-know basis. Records shall be stored securely, with access limited to authorised personnel. WAA shall comply with the Data Protection Act and shall apply additional caution to children's personal data, images, health information and protection information.

- Collect the minimum personal information necessary for safeguarding, referral and accountability.
- Obtain parent/guardian consent and child assent for non-emergency data processing involving children, unless lawful exceptions apply for protection or statutory reporting.
- Do not include identifying safeguarding details in public reports, donor stories, social media or case studies.
- Secure digital files with password protection and restricted access; store hard-copy files in locked cabinets.
- Retain records only for the period required by law, donor conditions and organisational policy.
- Media enquiries on safeguarding cases shall be handled only by authorised leadership and shall protect confidentiality and survivor dignity.

14. Partners, Suppliers and Third Parties

WAA shall require partners, suppliers, contractors and other third parties to comply with safeguarding standards proportionate to the risk and nature of the engagement.

- Safeguarding clauses shall be included in memoranda of understanding, grant agreements, supplier contracts and consultancy agreements.
- Partners working with children or vulnerable adults shall have a safeguarding policy or agree to comply with WAA's policy.
- WAA shall conduct safeguarding due diligence for high-risk partners, including schools, community organisations, contractors, drivers, photographers and enumerators.
- Serious safeguarding non-compliance may lead to suspension of activities, withholding of payments, termination of contract, reporting to donors or statutory referral.
- Joint programmes shall establish a shared incident-reporting and referral protocol before implementation.

15. Disciplinary Action and Sanctions

Any breach of this policy may result in disciplinary, contractual, legal or protective action. The severity of action shall depend on the nature of the breach, risk, evidence, applicable law and WAA's disciplinary procedure.

- Verbal or written warning for minor non-compliance, where appropriate.
- Mandatory retraining, supervision or reassignment.
- Suspension pending investigation where safety or integrity requires it.
- Termination of employment, consultancy, volunteer placement, partnership or supplier contract.
- Referral to police, children services, professional regulators, donors or other authorities where required.
- Debarment from future WAA engagement in serious cases.

16. Monitoring, Review and Learning

WAA will treat safeguarding as a continuous organisational learning and accountability function. The Safeguarding Focal Person shall prepare periodic safeguarding updates for management and the Governance, Human Capital & Ethics Committee while protecting case confidentiality.

Area	Indicator	Frequency
Training	% of staff, Board members, volunteers and high-risk partners trained on safeguarding	Quarterly / annually
Risk management	% of projects involving children or vulnerable adults with completed safeguarding risk assessment	Before implementation and quarterly review
Reporting	Number and type of concerns reported; response timeliness; case closure status	Quarterly
Partner compliance	% of relevant partners and suppliers with signed safeguarding clauses	Quarterly
Community accountability	Feedback mechanisms established and functional in field programmes	Programme cycle
Policy review	Policy reviewed, updated and approved	Annually or after serious incident

Annex 1: Safeguarding Code of Conduct Acknowledgement

I acknowledge that I have read, understood and agree to comply with WAA's Safeguarding / Child & Vulnerable Adults Protection Policy. I understand that breach of this policy may result in disciplinary action, termination of engagement and referral to authorities where appropriate.

Name	
Position / Organisation	
Signature	
Date	
Witness / HR representative	

Annex 2: Safeguarding Incident Reporting Form

Date and time of report	
Person completing form	
Contact details	
Location of incident/concern	
Name/identifier of affected person	
Age or estimated age	
Gender / disability or support needs, if relevant	
Parent/guardian/caregiver details, if safe and appropriate	
Description of concern: factual details only	
Immediate safety action taken	
Medical / psychosocial / legal referral made	
Reported to statutory authority? Details	
Reported internally to	
Follow-up required / case owner	

Annex 3: Safeguarding Risk Assessment Checklist

Risk area	Key question	Risk level	Mitigation / owner
Participant profile	Are children or vulnerable adults directly involved?	Low / Medium / High	
Venue and access	Is the venue safe, accessible, visible and suitable?	Low / Medium / High	
Transport	Will participants be transported? Are supervision and consent arrangements clear?	Low / Medium / High	
One-on-one contact	Could staff or partners be alone with a child or vulnerable adult?	Low / Medium / High	
Data and images	Will personal data, photos, videos or stories be collected?	Low / Medium / High	
Power imbalance	Are benefits, aid, jobs, stipends or services being	Low / Medium / High	

Risk area	Key question	Risk level	Mitigation / owner
	distributed?		
Disability inclusion	Are reasonable accommodations needed?	Low / Medium / High	
Gender and MHH	Are there privacy, safety or dignity concerns for girls and women?	Low / Medium / High	
Referral pathway	Are local medical, psychosocial, police and children services contacts known?	Low / Medium / High	

Annex 4: Consent and Assent Checklist for Images, Stories and Data

- Purpose of data/image/story explained in language understood by the participant.
- Parent/guardian consent obtained for children and child assent obtained where age-appropriate.
- Consent is voluntary and not linked to access to project benefits.
- No sensitive protection, health or location details will be published without specific authorisation and risk review.
- Participant understands where the information may be used, including reports, donor communications or public materials.
- Participant understands they may refuse or withdraw consent where practical and lawful.
- Consent form stored securely and linked to the relevant media or record.

Annex 5: Safe Recruitment Checklist

- Job description / terms of reference includes safeguarding duties and standards.
- Interview questions assess values, boundaries and suitability to work with communities and vulnerable groups.
- At least two references checked, including conduct-related questions.
- Police clearance or other lawful background checks completed where role requires it.
- Conflict-of-interest and safeguarding declarations completed.
- Safeguarding Code of Conduct signed before start date.
- Safeguarding induction completed before field deployment.

Annex 6: Referral Directory Template

County / location	Service	Institution / contact	Phone / email	Notes

Annex 7: Legal and Policy Reference List

- Constitution of Kenya, 2010.
- Children Act, Cap. 141 / Children Act, 2022.
- Sexual Offences Act, Cap. 63A.
- Counter-Trafficking in Persons Act, Cap. 61.
- Victim Protection Act, Cap. 79A.
- Protection Against Domestic Violence Act, Cap. 151.
- Data Protection Act, Cap. 411C.
- Employment Act, Cap. 226.
- Occupational Safety and Health Act, Cap. 236A.
- Basic Education Act, No. 14 of 2013.
- Persons with Disabilities Act, No. 4 of 2025.
- WAA Strategic Plan 2026–2030 and related institutional policies.

End of policy document.

PART 4

GENDER EQUALITY & SOCIAL INCLUSION POLICY

Operational Manual Section

WATER ABUNDANCE AFRICA

Water • Climate • Health • Prosperity

GENDER EQUALITY & SOCIAL INCLUSION POLICY

2026-2030

A policy for mainstreaming equality, non-discrimination, accessibility, participation and inclusion across WAA governance, operations, people management, partnerships and programmes.

Document status	Draft for Board review and adoption
Effective date	Upon approval by the Board of Directors
Review cycle	Annual management review; formal review every three years

Policy owner	Executive Director / Human Resources & Administration
Oversight	Governance, Human Capital & Ethics Committee
Applies to	Board, staff, volunteers, interns, consultants, contractors, partners and representatives

Prepared for Water Abundance Africa (WAA). This document should be reviewed by WAA leadership and, where required, Kenyan legal counsel before formal adoption.

Document Control and Approval

Item	Detail
Organisation	Water Abundance Africa (WAA)
Policy title	Gender Equality & Social Inclusion Policy
Strategic alignment	WAA Strategic Plan 2026-2030: Water • Climate • Health • Prosperity
Version	Version 1.0 - Draft
Prepared by	WAA Management / Policy Development Support
Recommended by	Governance, Human Capital & Ethics Committee
Approved by	Board of Directors
Effective date	To be inserted after Board approval
Next review date	Within 12 months of approval, then every three years or earlier if laws, donor requirements or operational risks change

Approval statement: This policy becomes binding once approved by the Board of Directors and communicated to all covered persons.

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1. Purpose and Policy Statement

Policy Statement

WAA is committed to equality, non-discrimination, inclusion, dignity, accessibility and meaningful participation in all its governance, employment, partnerships and programme activities. WAA will actively remove barriers that prevent women, men, youth, children, persons with disabilities, older persons, marginalised communities and other vulnerable groups from benefiting from, contributing to and leading development outcomes.

Purpose. The purpose of this policy is to provide a practical framework for mainstreaming gender equality and social inclusion across WAA's institutional systems and programmes. It guides decision-making, staffing, budgeting, programme design, implementation, monitoring, reporting and accountability.

WAA context. WAA works as a Climate-Water-Health Nexus Platform. Its mission integrates water security, climate resilience, renewable energy, environmental stewardship, health, food systems, education and innovative finance. Because water, climate and health challenges affect people differently, WAA must design interventions that recognise differences in power, access, risk, opportunity and voice.

- To promote equal access to WAA opportunities, resources, information, services and benefits.
- To prevent discrimination, exclusion, harassment and harmful practices in WAA operations and programmes.
- To ensure that WAA programmes respond to the needs, capacities and priorities of women, men, youth, children, persons with disabilities, older persons and marginalised groups.
- To guide staff and partners on practical measures for inclusive design, implementation, monitoring and reporting.
- To strengthen donor confidence by demonstrating compliance with Kenyan law, international good practice and WAA's accountability commitments.

2. Scope of Application

This policy applies to: all WAA Board members, committee members, staff, volunteers, interns, fellows, consultants, contractors, suppliers, implementing partners, technical partners, community mobilisers and any person acting on behalf of WAA.

- All WAA programmes, including water security, climate resilience, WASH, health, food and nutrition, education, renewable energy, youth and women enterprise, research, advocacy and policy engagement.
- All WAA workplaces, field sites, community meetings, schools, health facilities, partner premises, trainings, workshops, online platforms and official travel.
- All stages of the project cycle: assessment, design, budgeting, procurement, implementation, monitoring, evaluation, learning and closeout.
- All donor-funded, co-financed, privately funded and internally funded activities.

***Note:** Where donor requirements are stricter than this policy, the stricter standard shall apply, provided it is consistent with Kenyan law.*

3. Legal and Strategic Basis

This policy is developed in line with WAA's institutional strategy and the legal and policy environment in Kenya. It should be read together with WAA's Human Resource Policy, Safeguarding Policy, Finance Policy,

Environmental and Social Safeguards Policy, Anti-Fraud and Whistleblowing Policy, Procurement procedures, Data Protection procedures and Code of Conduct.

Reference	GESI relevance to WAA
Constitution of Kenya, 2010	Provides for equality, non-discrimination, human dignity, affirmative action and protection of women, children, persons with disabilities, youth, older persons and marginalised groups.
Employment Act, 2007	Requires equality of opportunity in employment, prohibits discrimination and requires sexual harassment prevention measures in the workplace.
National Gender and Equality Commission Act, 2011	Provides Kenya's institutional framework for gender equality, freedom from discrimination and mainstreaming of special interest groups.
Persons with Disabilities Act, 2025	Provides for disability inclusion, accessibility, reasonable accommodation, non-discrimination and participation of persons with disabilities.
Children Act, 2022	Supports non-discrimination and the best interests of the child in all matters affecting children.
Data Protection Act, 2019	Guides lawful, fair, secure and confidential handling of personal and sensitive data, including sex, age, disability and vulnerability data.
Occupational Safety and Health Act, 2007	Supports safe working conditions for all workers, including inclusive field and office safety arrangements.
Sexual Offences Act, 2006 and related protection laws	Support protection from sexual exploitation, abuse, harassment and gender-based violence.
Relevant donor and partner requirements	May require gender action plans, disability inclusion, safeguarding, accessible complaints systems and sex/age/disability-disaggregated reporting.

Legal review: This policy is intended for organisational governance and operational use. It should be reviewed periodically against updates to Kenyan laws, regulations and donor requirements.

4. Definitions

Term	Meaning in this policy
Gender	The socially constructed roles, responsibilities, expectations and power relations associated with women, men, girls and boys in a given context.
Gender equality	Equal rights, responsibilities, opportunities, access, control and benefit for women, men, girls and boys, without discrimination.
Social inclusion	The process of improving participation, access and voice for people who may be excluded because of gender, age, disability, poverty, geography, ethnicity, religion, health status, displacement, education level or other factors.
Equity	Fairness in treatment, access and outcomes, including targeted measures to address disadvantage and unequal starting points.
Discrimination	Direct or indirect differential treatment that excludes, restricts or disadvantages a person or group based on prohibited or unfair grounds.
Marginalised groups	Groups that face systemic barriers to rights, services, resources, participation or opportunity.
Persons with disabilities	Persons with physical, sensory, intellectual, mental, psychosocial or other impairments who may face barriers that hinder full and equal participation.
Reasonable accommodation	Necessary and appropriate adjustments that do not impose disproportionate burden but enable persons with disabilities to participate equally.
Gender-based violence	Violence directed at a person based on gender, sex, power imbalance or gender norms, including sexual harassment, exploitation, abuse and harmful practices.

Term	Meaning in this policy
Safeguarding	Measures to prevent, report and respond to harm, abuse, exploitation, harassment or neglect affecting staff, communities and people engaged through WAA programmes.

5. Guiding Principles

Dignity and respect: All people shall be treated with respect, without humiliation, stereotyping or demeaning language.

Equality and non-discrimination: No person shall be excluded from WAA opportunities or services on unfair grounds, including sex, pregnancy, marital status, health status, ethnicity, age, disability, religion, culture, language, social origin or birth.

Do no harm: WAA will assess and manage risks that may expose people to discrimination, backlash, violence, exploitation or exclusion.

Meaningful participation: Affected groups should participate in decisions that affect them, including needs assessments, project design, feedback, monitoring and evaluation.

Accessibility: WAA will progressively remove physical, communication, digital, financial, attitudinal and procedural barriers to participation.

Accountability: WAA will track GESI commitments, provide safe complaint channels and act on lessons learned.

Confidentiality and informed consent: Personal information must be collected and used lawfully, fairly, securely and only for legitimate programme purposes.

Local ownership: GESI approaches must respect community context while upholding rights, safety, dignity and Kenyan law.

6. WAA Commitments

WAA commits to the following institutional and programmatic actions:

- Mainstream GESI in strategic planning, annual workplans, budgets, proposals and programme designs.
- Apply gender, disability, youth and marginalisation analysis during assessments and project preparation.
- Ensure inclusive recruitment, fair treatment, non-discrimination, safe working conditions and equal opportunity for staff and representatives.
- Promote women's leadership, youth participation, disability inclusion and participation of marginalised communities in programme governance and decision-making.
- Design services and infrastructure that are safe, accessible and responsive to the needs of different user groups, including girls, women, children, persons with disabilities and older persons.
- Collect and use sex, age and disability disaggregated data where lawful, ethical and relevant.
- Provide accessible complaint and feedback mechanisms for staff, partners and communities.
- Include GESI obligations in partner agreements, supplier contracts and consultant terms of reference where relevant.

- Report on GESI results, risks, challenges and corrective actions to management, Board committees and donors as required.

7. Governance, Roles and Accountability

Role / body	Responsibilities
Board of Directors	Approve this policy; exercise fiduciary and ethical oversight; ensure WAA leadership promotes equality, inclusion and non-discrimination.
Governance, Human Capital & Ethics Committee	Oversee implementation of GESI, safeguarding, ethics, staff welfare and accountability commitments; review annual GESI reports and recommend improvements.
Executive Director	Provide leadership, allocate responsibility and resources, ensure compliance with Kenyan law and donor requirements, and report significant GESI risks to the Board.
Human Resources & Administration	Mainstream GESI in recruitment, contracts, induction, performance management, training, workplace adjustments, grievances and staff records.
Programmes & Impact Team	Integrate GESI analysis, inclusive participation, accessibility and disaggregated indicators into projects and reports.
Finance and Procurement	Ensure inclusive budgeting, fair supplier engagement, compliant documentation and, where applicable, targeted engagement of women, youth and disability-led enterprises.
MEL / Knowledge Team	Develop GESI indicators, collect disaggregated data, maintain confidentiality and support learning.
Safeguarding / Complaints Focal Person	Receive and escalate complaints related to discrimination, harassment, exclusion, retaliation or abuse through safe and confidential channels.
All staff, volunteers and partners	Comply with this policy, treat people respectfully, report concerns, avoid discrimination and promote inclusion in daily work.

8. GESI in the Programme Cycle

GESI shall be integrated into each stage of WAA's programme cycle. The following minimum requirements apply unless a project risk assessment justifies stronger requirements.

Stage	Minimum GESI requirements
Assessment and baseline	Identify who is affected, who is excluded, who controls resources, who bears unpaid care burdens, who faces mobility or access constraints, and which groups are most at risk.
Design	Set clear GESI objectives, include inclusive consultation, define accessibility measures, identify safeguarding risks and budget for inclusion.
Budgeting	Include budget lines for community participation, translation, accessible venues, reasonable accommodation, childcare where appropriate, safe transport, disability access, training and grievance mechanisms.
Implementation	Schedule activities at accessible times and places; ensure safe participation; use inclusive language and communication; engage local leaders, women, youth and marginalised groups.
Procurement	Ensure tender processes do not exclude small, local, women-led, youth-led or disability-led suppliers without justification; apply ethical sourcing and safeguarding clauses.
Monitoring	Track sex, age, disability and vulnerability data where appropriate; monitor participation, benefit distribution, complaints and unintended harm.
Evaluation and learning	Assess whether different groups benefited equitably; document

Stage	Minimum GESI requirements
	barriers, lessons and corrective actions.
Minimum project design rule Every WAA project proposal should include: (1) a GESI context paragraph, (2) at least one inclusion action, (3) a disaggregated beneficiary approach, (4) an accessible complaints channel, and (5) a budget provision for inclusion measures.	

9. Workplace Equality and Inclusive Employment

WAA shall maintain a workplace that is fair, respectful, safe and free from discrimination, harassment, intimidation, victimisation and retaliation.

9.1 Recruitment and selection

- Vacancies shall use non-discriminatory language and objective selection criteria based on job requirements.
- Shortlisting and interviews shall be documented and based on merit, competency, integrity and role requirements.
- Reasonable accommodation shall be provided to candidates with disabilities where requested and practical.
- Recruitment panels should aim for gender balance and include staff trained on fair selection where possible.
- WAA shall not require information that is irrelevant to the role or that could be used for discriminatory purposes, except where lawful and necessary for reasonable accommodation or safeguarding.

9.2 Contracts, pay and benefits

- Employees and consultants shall receive clear terms of engagement, job descriptions, reporting lines and remuneration basis.
- Pay decisions shall be based on role value, budget, qualifications, experience and performance, not gender, disability, age, ethnicity or other discriminatory grounds.
- WAA shall comply with statutory deductions, employment records and staff administration requirements under Kenyan law.

9.3 Performance, promotion and learning

- Performance management shall use documented objectives and feedback processes.
- Training and leadership opportunities shall be accessible to staff across gender, age, disability and location where relevant.
- WAA shall support growth of women, youth and under-represented staff into technical, management and leadership roles.

9.4 Harassment, sexual harassment and hostile work environment

- WAA prohibits sexual harassment, bullying, intimidation, abusive language, humiliation, retaliation and any conduct that creates a hostile or exclusionary environment.
- Complaints shall be handled confidentially, promptly, fairly and without retaliation.
- Managers who know or should reasonably know of harassment and fail to act may be subject to disciplinary action.

9.5 Flexible and family-friendly practices

- Subject to role requirements and donor rules, WAA may allow flexible arrangements for caregivers, lactating mothers, persons with disabilities, health needs and safety concerns.

- Field planning shall consider safe travel, accommodation, privacy, security, health needs and family responsibilities, particularly for staff assigned to remote locations.

10. Disability Inclusion and Accessibility

WAA will progressively remove barriers to participation and ensure persons with disabilities can access opportunities, services, information and safe working conditions on an equal basis with others.

- Assess accessibility needs during recruitment, activity planning, community meetings, training, procurement and infrastructure design.
- Provide reasonable accommodation where feasible, including accessible venues, seating, transport arrangements, sign language interpretation, large-print materials, digital accessibility, assistive technology, flexible formats and adjusted working arrangements.
- Engage persons with disabilities and representative organisations in project design where disability inclusion is material to the intervention.
- Ensure WASH, water, school and community infrastructure considers safe access for women, children, older persons and persons with disabilities.
- Avoid disability-related language that is demeaning, stigmatising or inconsistent with dignity and respect.

Barrier type	Examples of WAA response
Physical	Ramps, handrails, accessible toilets, safe paths, seating arrangements, adequate lighting and safe waiting areas.
Communication	Plain language, local language, visual materials, sign language interpretation, accessible digital formats and multiple feedback channels.
Financial	Transport support, inclusive budgeting, local venues, reduced participation costs where donor rules allow.
Attitudinal	Staff training, respectful language, community sensitisation and zero tolerance for ridicule or exclusion.
Procedural	Flexible timing, accessible registration, consent processes and simple complaints procedures.

11. Community Engagement and Participation

WAA's work is community-centred. Inclusive participation is required to ensure programmes are relevant, safe, sustainable and accountable.

- Community consultations shall intentionally include women, men, youth, persons with disabilities, older persons, caregivers, minority voices and local duty bearers.
- Meetings shall be scheduled in ways that reduce exclusion caused by distance, insecurity, household labour, caregiving, market days, school hours, religious observance or mobility barriers.
- Separate consultation spaces may be used where needed to allow women, girls, youth, persons with disabilities or other groups to speak freely and safely.
- WAA shall use accessible communication methods, including local language, plain messages, visual explanation and trusted community channels.
- Community committees supported by WAA should aim for balanced representation and meaningful participation, not token membership.
- Feedback and complaints channels shall be explained clearly at the start of project engagement and throughout implementation.

12. Procurement, Partnerships and Consultants

WAA shall ensure that partners, contractors, suppliers and consultants uphold equality, inclusion and non-discrimination in work performed for or with WAA.

- Partner due diligence shall consider safeguarding, ethical conduct, non-discrimination and capacity to work inclusively with communities.
- Contracts and memoranda of understanding shall include GESI, safeguarding, anti-harassment and non-retaliation clauses where relevant.
- Procurement processes shall be fair, transparent and documented, and shall not impose unnecessary requirements that exclude smaller local suppliers or enterprises led by women, youth or persons with disabilities.
- Supplier evaluation may include local employment, community benefits, gender balance, safety practices, accessibility and complaint handling, where relevant to the work.
- Consultants working on research, community data, training, infrastructure, WASH or livelihoods must apply inclusive methods and protect personal data.

13. Data, Privacy, Monitoring and Learning

WAA will use data to understand who is being reached, who is excluded and what corrective action is needed. Data shall be collected only where necessary, lawful, ethical and useful for programme quality and accountability.

Data / indicator area	Minimum requirement
Beneficiary data	Disaggregate by sex, age and disability where relevant and safe; add location and vulnerability data where needed.
Participation	Track who attends consultations, trainings, committees and leadership forums.
Benefits	Assess who receives water access, training, jobs, enterprise support, WASH services or other benefits.
Risks	Track exclusion risks, complaints, harassment concerns, accessibility gaps and corrective actions.
Privacy	Limit access to personal information; obtain informed consent where required; anonymise sensitive reports; store records securely.
Learning	Document practical lessons on what improved access, participation, leadership and outcomes for different groups.

Important: GESI data should never be collected in a way that exposes people to stigma, retaliation, family or community conflict, political risk, digital harm or breach of confidentiality.

14. Complaints, Incident Reporting and Response

WAA shall maintain safe, accessible and confidential reporting channels for concerns relating to discrimination, harassment, exclusion, retaliation, denial of reasonable accommodation or other breaches of this policy.

Complaint / concern	Reporting route	Response standard
Workplace discrimination or harassment	Supervisor, HR, Safeguarding/Complaints Focal Person or Executive Director	Confidential review, protection against retaliation, fair inquiry and corrective action.
Community exclusion or inaccessible service	Project Officer, Community Feedback Channel or Complaints Focal Person	Register complaint, assess barrier, agree corrective action and communicate

Complaint / concern	Reporting route	Response standard
		outcome where safe.
Disability accommodation issue	HR, Project Manager or Complaints Focal Person	Engage affected person, document requested accommodation and respond promptly.
Partner or supplier misconduct	Procurement/Programmes Lead, HR or Executive Director	Review contract obligations, investigate, apply corrective measures or termination if justified.
Safeguarding or serious harm	Safeguarding Focal Person or Executive Director; referral to relevant authority where required	Follow the Safeguarding Policy and prioritise survivor safety, confidentiality and legal reporting obligations.

- No person shall suffer retaliation for reporting a concern in good faith or supporting an investigation.
- Complaints shall be recorded securely and shared only with persons who need the information to take action.
- Anonymous complaints may be received and assessed, but WAA's ability to investigate may depend on available information.
- Where a complaint involves criminal conduct, child protection or serious harm, WAA shall follow legal reporting and referral requirements while protecting the survivor or complainant.

15. Training, Communication and Capacity Development

WAA will ensure that this policy is understood and applied by staff, partners and relevant community representatives.

- All new staff, volunteers and interns shall receive orientation on GESI, safeguarding, code of conduct, reporting channels and respectful workplace expectations.
- Managers and project leads shall receive practical training on inclusive planning, risk assessment, accessible complaints handling and disaggregated reporting.
- Procurement, finance and administration teams shall receive guidance on inclusive supplier engagement, reasonable accommodation and documentation.
- Community-facing teams shall be trained on inclusive facilitation, local language communication, safe consultation and referral pathways.
- Policy refreshers shall be conducted annually or when there are material changes in law, donor requirements or WAA operations.

16. Non-Compliance and Disciplinary Measures

Any breach of this policy may result in corrective or disciplinary action, depending on the nature and severity of the breach. WAA shall ensure due process, confidentiality, fairness and protection from retaliation.

Breach	Possible action
Unintentional non-compliance or poor practice	Coaching, written guidance, corrective action plan, refresher training.
Repeated failure to apply inclusion requirements	Performance management action, written warning, restricted responsibility or escalation to management.
Harassment, discrimination or retaliation	Investigation, disciplinary action, suspension, termination of engagement and/or referral where required.
Partner or supplier non-compliance	Corrective action notice, withholding of payment where contractual, contract termination, exclusion from future work.
Deliberate concealment, victimisation or interference	Formal investigation, disciplinary action and escalation to Board or relevant authorities where appropriate.

17. Review and Continuous Improvement

This policy shall be reviewed annually by management and formally reviewed at least every three years by the Governance, Human Capital & Ethics Committee. It may be reviewed earlier if there is a major change in Kenyan law, donor requirements, organisational structure, operating context, safeguarding risk, evaluation findings or Board direction.

- Annual review shall consider complaints trends, recruitment data, programme reach, accessibility gaps, donor feedback, partner performance and audit findings.
- The Executive Director shall ensure implementation gaps are converted into management actions and reported to the relevant Board committee.
- Lessons learned shall be integrated into WAA's HR, Finance, Procurement, Safeguarding, MEL and Programme procedures.

Annex 1: GESI Checklist for Project Design

Area	Question	Status	Action required
Problem analysis	Have different impacts on women, men, girls, boys, persons with disabilities, youth, older persons and marginalised groups been analysed?	Yes / No / N/A	
Participation	Were affected groups consulted safely and meaningfully?	Yes / No / N/A	
Accessibility	Are venues, infrastructure, communication, timing and transport accessible?	Yes / No / N/A	
Budget	Is there a budget for reasonable accommodation and inclusion measures?	Yes / No / N/A	
Safeguarding	Have risks of harassment, exploitation, abuse, backlash or exclusion been assessed?	Yes / No / N/A	
Data	Are indicators disaggregated by sex, age and disability where appropriate?	Yes / No / N/A	
Complaints	Are complaint channels safe, accessible and communicated to communities?	Yes / No / N/A	
Partnerships	Do partners and suppliers understand WAA GESI requirements?	Yes / No / N/A	

Annex 2: GESI Risk Register Template

Risk	Affected group(s)	Likelihood	Impact	Mitigation	Owner	Status
Example: Meeting time excludes women caregivers	Women, caregivers	Medium	Medium	Adjust timing, provide advance notice and consider childcare support	Project Lead	Open
Example: Venue inaccessible	Persons with disabilities, older persons	Medium	High	Select accessible venue or provide reasonable accommodation	Admin / Project Lead	Open
Example: Community leaders dominate selection	Women, youth, marginalised households	Medium	High	Use transparent criteria and separate consultations	Project Team	Open

Annex 3: Inclusive Recruitment Checklist

- Job advertisement uses inclusive, non-discriminatory language.
- Essential and desirable criteria are clearly separated and linked to the role.
- Application method is accessible and does not require unnecessary documents.
- Shortlisting is based on documented criteria.
- Interview panel is briefed on fair selection and unconscious bias.
- Candidates are invited to request reasonable accommodation.
- Interview notes and scores are retained securely.
- Final decision is documented and approved according to HR procedures.

Annex 4: Inclusive Meeting and Training Checklist

Requirement	Done?	Notes
Accessible venue, seating and toilets		
Safe timing and transport considerations		
Local language or translation support		
Sign language / large print / accessible digital materials where needed		
Separate consultation spaces where needed		
Complaints and feedback channel explained		
Attendance disaggregated by sex, age and disability where appropriate		

Annex 5: Complaint Intake Form for GESI Concerns

Field	Details
Date received	
Mode of complaint	In person / phone / email / anonymous / suggestion box / partner referral
Complainant name	Optional, unless necessary for follow-up
Contact details	Optional
Nature of concern	Discrimination / harassment / exclusion / accessibility / retaliation / other
Location / project	
Immediate safety concern?	Yes / No. If yes, escalate immediately.
Confidentiality request	
Action taken	
Responsible officer	
Close-out date	

Annex 6: Annual GESI Reporting Template

Reporting area	Suggested measure
Staff profile	Sex, age bracket and disability representation where voluntarily disclosed and lawful.
Recruitment	Number of applicants, shortlisted and selected by sex and other relevant categories.
Training	Number of staff/partners trained on GESI, safeguarding and complaints channels.
Programme reach	Beneficiaries reached by sex, age, disability and vulnerability category where appropriate.
Leadership participation	Representation in community committees, youth forums, women's groups and project governance.
Accessibility	Number of activities or infrastructure designs with accessibility measures.
Complaints	Number and category of GESI-related complaints received, resolved and pending, with confidentiality preserved.
Lessons and improvements	Key barriers, corrective actions and policy updates required.

Legal and Institutional References

- Constitution of Kenya, 2010.
- Employment Act, 2007.
- National Gender and Equality Commission Act, 2011.
- Persons with Disabilities Act, 2025 and applicable subsidiary regulations or transition provisions.
- Children Act, 2022.
- Data Protection Act, 2019.
- Occupational Safety and Health Act, 2007.
- Sexual Offences Act, 2006.
- Relevant donor safeguarding, GESI, disability inclusion and environmental/social requirements.
- WAA Strategic Plan 2026-2030.
- WAA Human Resource Policy and Procedures 2026-2030.
- WAA Safeguarding / Child and Vulnerable Adults Protection Policy 2026-2030.

Approval

Name / office	Signature	Date
Board Chairperson		
Executive Director		
Chair, Governance, Human Capital & Ethics Committee		

PART 5

ENVIRONMENTAL & SOCIAL SAFEGUARDS POLICY

Operational Manual Section

WATER ABUNDANCE AFRICA (WAA)

ENVIRONMENTAL & SOCIAL SAFEGUARDS POLICY

2026-2030

Strategic Theme: Water • Climate • Health • Prosperity

Policy for responsible project design, environmental protection, social inclusion, risk management and accountable implementation in Kenya and the wider Global South.

Document Status: Board Approval Draft

Effective Date: To be approved by the Board

Review Cycle: Annual review and comprehensive review in 2030

Document Control and Approval

Item	Details
Organisation	Water Abundance Africa (WAA)
Policy title	Environmental & Social Safeguards Policy
Policy period	2026-2030
Strategic theme	Water • Climate • Health • Prosperity
Policy owner	Executive Director / Environmental & Social Safeguards Focal Point
Oversight bodies	Board of Directors; Governance, Human Capital & Ethics Committee; Finance, Audit & Risk Committee; Programmes & Impact Committee
Applies to	Board members, staff, consultants, volunteers, interns, contractors, suppliers, consortium partners, implementing partners and all WAA-funded or WAA-supported projects
Effective date	To be inserted upon approval
Next review date	One year after approval, then annually or earlier when laws, donor requirements or risk exposure change

Role	Office / Body	Signature	Date
Prepared by	Executive Director / Management		
Reviewed by	Governance, Human Capital & Ethics Committee		
Reviewed by	Finance, Audit & Risk Committee		
Approved by	Board of Directors		

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Acronyms and Key Definitions

Acronym / Term	Meaning
E&S	Environmental and Social
EIA	Environmental Impact Assessment
EA	Environmental Audit
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Safeguards
GESI	Gender Equality and Social Inclusion
GRM	Grievance Redress Mechanism
MEL	Monitoring, Evaluation and Learning
NEMA	National Environment Management Authority
OSH	Occupational Safety and Health
PAPs	Project-Affected Persons
WAA	Water Abundance Africa
WASH	Water, Sanitation and Hygiene
Vulnerable groups	People who may be disproportionately affected by project impacts, including children, women, older persons, persons with disabilities, people in extreme poverty, refugees, pastoralists, minority groups and people with limited access to decision-making.
Safeguards	Policies, procedures and controls used to identify, avoid, minimise, mitigate, monitor and remedy environmental and social risks and impacts.

1. Policy Statement

Water Abundance Africa (WAA) commits to designing and implementing all programmes and projects in a manner that protects the environment, respects human dignity, promotes social inclusion, safeguards public health and strengthens community resilience. WAA recognises that water security cannot be separated from climate resilience, renewable energy, ecosystem health, public health, food systems, education, digital innovation and inclusive finance.

This Environmental and Social Safeguards Policy establishes the minimum standards that must be applied across WAA operations to ensure that projects deliver positive outcomes while preventing, reducing and managing adverse environmental and social risks.

WAA will not knowingly support any project, activity, contractor or partner that causes significant unmanaged harm to people, natural ecosystems, water resources, biodiversity, cultural heritage or community livelihoods. Where risk cannot be managed to an acceptable level, WAA will redesign, defer or decline the activity.

2. Purpose and Objectives

The purpose of this policy is to provide a practical institutional framework for identifying, assessing, managing, monitoring and reporting environmental and social risks in WAA programmes. It supports compliance with Kenyan law, donor requirements and international good practice while preserving WAA's community-centred approach.

The objectives are to:

- Ensure all projects are screened for environmental and social risk before approval and implementation.
- Integrate prevention, mitigation, monitoring and accountability measures into project design, budgets and contracts.
- Protect children, women, persons with disabilities, vulnerable adults and marginalised groups from harm and exclusion.
- Support sustainable use of water, land, biodiversity and energy resources.
- Strengthen occupational and community health and safety in field operations.
- Promote meaningful stakeholder engagement, public participation and accessible grievance handling.
- Ensure compliance with Kenyan laws, permits, licences and environmental approval conditions.
- Build institutional readiness for climate finance, donor-funded programmes and responsible scale-up across Kenya and the Global South.

3. Scope and Applicability

This policy applies to all WAA programmes, projects, studies, pilots, partnerships, procurement processes, construction works, technical assistance, community activities and institutional operations.

It applies to:

- Board members, management and staff.
- Consultants, volunteers, fellows, interns and short-term personnel.
- Contractors, subcontractors, suppliers and service providers.
- Consortium partners, implementing partners and technical partners.
- Projects funded by donors, government, private sector, climate finance, philanthropic partners or WAA unrestricted resources.
- Activities involving boreholes, water infrastructure, WASH facilities, solar pumping, rainwater harvesting, school gardens, tree planting, watershed restoration, air-quality monitoring, digital systems, community training and related interventions.

Where a donor or regulator requires stricter safeguards than this policy, the stricter standard shall apply.

Where this policy is stricter than a partner's internal procedures, WAA's policy shall apply to all WAA-managed activities unless otherwise approved by the Board.

4. Legal and Regulatory Framework in Kenya

WAA shall comply with applicable Kenyan laws, regulations, standards, permits and county requirements. The following framework guides this policy. This list is not exhaustive and shall be updated when laws change or when project-specific legal requirements arise.

Law / Requirement	Relevance to WAA ESS Policy
Constitution of Kenya, 2010	Articles on national values, equality and non-discrimination, the right to a clean and healthy environment, economic and social rights, obligations on sustainable exploitation and conservation of the environment, and remedies for environmental harm.
Environmental Management and Co-ordination Act (EMCA), Cap. 387	Framework law for environmental management, NEMA oversight, pollution control, environmental rights, environmental restoration and project approval requirements.
Environmental (Impact Assessment and Audit) Regulations, 2003	Screening, project reports, EIA studies, environmental management plans, public participation and environmental audits for projects that may affect the environment.
Sustainable Waste Management Act, 2022	Waste hierarchy, circular economy, segregation, reduction,

Law / Requirement	Relevance to WAA ESS Policy
	reuse, recycling, recovery and safe disposal of waste.
Water Act, 2016	Water resources management, water permits, water services, catchment protection, groundwater and surface-water stewardship.
Climate Change Act, 2016 and subsequent amendments	Climate resilience, low-carbon development, mainstreaming of climate change into planning and relevant carbon market obligations.
Occupational Safety and Health Act, 2007	Workplace safety, prevention of accidents and occupational disease, safe systems of work, risk prevention and safety culture.
Work Injury Benefits Act, 2007	Compensation and reporting obligations for work-related injuries and occupational disease.
Public Health Act, Cap. 242 and county public health by-laws	Protection of public health, sanitation, nuisance prevention, disease prevention and hygiene standards.
Physical and Land Use Planning Act, 2019	Development control, land-use planning and approval of works consistent with spatial planning and public welfare.
Land Act, 2012 and Community Land Act, 2016	Land rights, land access, community land interests, compensation principles and avoidance of unfair displacement or livelihood harm.
Forest Conservation and Management Act, 2016; Wildlife Conservation and Management Act, 2013	Protection of forests, biodiversity, habitats, wildlife corridors and conservation areas.
Employment Act, 2007; Persons with Disabilities Act, 2003; National Gender and Equality Commission Act, 2011	Non-discrimination, fair labour practices, inclusion of women, youth and persons with disabilities, and protection from harassment.
Children Act, 2022; Sexual Offences Act, 2006; Data Protection Act, 2019	Child protection, protection from sexual exploitation and abuse, confidentiality, safe data handling and responsible consent when engaging communities and learners.
Relevant permits, licence conditions and county regulations	WAA projects shall follow site-specific requirements, including NEMA licence conditions, WRA permits, county development approvals, public health approvals and donor safeguard requirements.

5. Safeguard Principles

WAA's environmental and social safeguards are guided by the following principles:

- **Avoidance first:** Avoid adverse impacts where possible before considering mitigation or compensation.
- **Precautionary approach:** Where serious or irreversible harm may occur, uncertainty shall not delay protective action.
- **Do no harm:** Project benefits shall not be achieved at the expense of unsafe, exploitative or environmentally damaging practices.
- **Polluter pays and responsible stewardship:** Any party causing environmental harm shall meet the cost of clean-up, restoration and corrective action in accordance with law and contract terms.
- **Meaningful participation:** Communities shall receive timely information and have a safe opportunity to influence decisions affecting them.
- **Equity and inclusion:** Women, youth, persons with disabilities, pastoralist communities and other vulnerable groups shall be meaningfully included.
- **Climate resilience:** All infrastructure and community interventions shall consider drought, flooding, heat, water stress and other climate risks.
- **Accountability:** Safeguard decisions, grievances, incidents and corrective actions shall be documented and reported.

- **Transparency and evidence:** WAA will use data, field evidence and learning to improve project quality and prevent harm.

6. Environmental and Social Governance Structure

WAA's safeguards system is anchored in its governance and organisational excellence framework. The Board of Directors provides strategic leadership and fiduciary oversight. The Finance, Audit & Risk Committee oversees internal controls, audit, risk and investment oversight. The Programmes & Impact Committee oversees programme quality, monitoring, evaluation and learning. The Governance, Human Capital & Ethics Committee oversees ethics, safeguarding and succession.

Actor / Body	Environmental and Social Safeguards Responsibilities
Board of Directors	Approve the policy; ensure WAA has adequate systems, resources and accountability mechanisms for E&S safeguards; review serious incidents and high-risk projects.
Executive Director	Ensure implementation of the policy across WAA; appoint an ESS Focal Point; ensure staff, partners and contractors comply with the policy and legal requirements.
ESS Focal Point / Programme Safeguards Lead	Coordinate screening, risk categorisation, ESMP preparation, safeguard monitoring, incident reporting, capacity building and quarterly safeguards reporting.
Programmes & Impact Committee	Review programme-level E&S risks, safeguard indicators, community feedback, MEL findings and corrective action status.
Finance, Audit & Risk Committee	Review enterprise risk, insurance, internal controls, fraud/corruption links to E&S risk, audit findings and financial provisions for mitigation.
Governance, Human Capital & Ethics Committee	Oversee safeguarding, ethics, inclusion, staff conduct and grievance response affecting vulnerable persons.
Project Managers	Integrate E&S screening, ESMP budgets, permits, contractor clauses, monitoring and reporting into project implementation.
Procurement / Finance Team	Ensure E&S requirements are embedded in budgets, procurement, contracts, payment milestones and supplier due diligence.
Contractors and Suppliers	Comply with WAA contract clauses, site-specific ESMPs, safety procedures, labour standards, waste controls and incident reporting obligations.
All Staff and Representatives	Observe the policy, report incidents and risks, treat communities with respect, protect vulnerable groups and prevent environmental damage.

7. Risk Screening and Categorisation

Every WAA project shall undergo environmental and social screening before approval, budgeting, procurement or field implementation. Screening shall be proportionate to the scale, location, sensitivity and potential impacts of the activity.

Screening shall consider:

- Nature and scale of the project or activity.
- Site sensitivity, including water sources, wetlands, forests, protected areas, schools, health facilities and community land.
- Potential impacts on land, water, air, soil, biodiversity, health, safety, livelihoods and cultural heritage.

- Risks to children, women, persons with disabilities, older persons and other vulnerable groups.
- Labour, contractor, supply chain and occupational safety risks.
- Need for permits, licences, EIA, environmental audit, WRA permits, county approvals or specialist assessments.
- Climate risks such as drought, flooding, heat stress, erosion, water scarcity and climate-sensitive disease.

Risk Category	Indicative Description	Minimum Requirement
Low	Activities with minimal or no adverse E&S impact, such as office-based research, desk studies, low-risk training or policy meetings.	Basic screening, code of conduct, safe venue checklist and records.
Moderate	Small-scale infrastructure, WASH improvements, school gardens, limited solar installations or community trainings with manageable impacts.	Screening form, ESMP or mitigation plan, stakeholder engagement, safety plan and monitoring.
Substantial	Borehole drilling/rehabilitation, water storage and distribution systems, solar pumping, watershed restoration, construction in sensitive community settings or projects with significant contractor activity.	Detailed screening, ESMP, permit review, community consultation, contractor E&S clauses, incident plan and management approval.
High	Projects with potential irreversible impacts, significant displacement, protected habitat disturbance, major water abstraction, serious health and safety risk or major social conflict.	Board review; specialist assessment; NEMA/WRA approvals where required; enhanced ESMP; independent review where necessary. WAA may decline if risks cannot be managed.

8. Environmental and Social Assessment Requirements

Based on screening, WAA shall determine the appropriate level of assessment and management instruments. Assessments shall be completed before implementation and shall be budgeted as part of project costs.

Assessment tools may include:

- Environmental and Social Screening Form.
- Project report or EIA study by a qualified and registered EIA expert where required under Kenyan law.
- Environmental and Social Management Plan (ESMP).
- Occupational and Community Health and Safety Plan.
- Waste Management Plan.
- Stakeholder Engagement Plan.
- Water-resource assessment or hydrogeological assessment where applicable.
- Chance Find Procedure for cultural heritage.
- Land access and livelihood impact note where land or community assets are involved.
- Environmental Audit during operation where required.

No project requiring a NEMA licence, WRA permit or county approval shall commence before the required approval is obtained. Where approval conditions are issued, the Project Manager shall incorporate them into the ESMP and project workplan.

9. Stakeholder Engagement, Consultation and Disclosure

WAA shall promote early, inclusive and culturally appropriate stakeholder engagement. Engagement shall be designed to ensure that affected communities understand the project, its benefits, potential risks, mitigation measures, grievance channels and their role in implementation and maintenance.

Stakeholder engagement shall include:

- Identification of stakeholders and project-affected persons before project design is finalised.
- Separate and safe consultation channels where necessary for women, girls, youth, persons with disabilities and vulnerable groups.
- Information in accessible language and formats suited to the community context.
- Documentation of meetings, attendance, issues raised and responses provided.
- Disclosure of relevant E&S information, including project purpose, construction period, safety risks, expected benefits and grievance channels.
- Feedback to communities on how their concerns influenced design or mitigation measures.

Consultation shall not be treated as a one-off meeting. For longer projects, WAA shall maintain engagement throughout design, implementation, handover, monitoring and closure.

10. Grievance Redress Mechanism

WAA shall maintain an accessible, confidential and non-retaliatory Grievance Redress Mechanism (GRM) for communities, workers, partners and other stakeholders. The GRM shall be available before and during project implementation and shall continue for a reasonable period after completion.

The GRM shall:

- Allow complaints to be made orally, in writing, by phone, by email, through community focal persons or through confidential channels.
- Be accessible to persons with disabilities and people with low literacy.
- Include a safe pathway for sensitive complaints involving sexual exploitation, abuse, harassment, child protection or gender-based violence.
- Protect complainants from retaliation.
- Acknowledge complaints within seven working days where contact details are available.
- Assess urgency, investigate fairly and record agreed corrective actions.
- Close complaints only after response, action or justified referral has been documented.
- Escalate serious or unresolved grievances to the Executive Director and relevant Board committee.

The GRM does not prevent complainants from using statutory reporting channels, law enforcement, regulators, courts or other legal remedies available under Kenyan law.

11. Land Access, Livelihoods and Resettlement Avoidance

WAA shall avoid involuntary physical or economic displacement. Projects shall be designed to use existing institutional land, voluntarily provided land, public utility spaces or legally secured project sites wherever possible.

Where land access is needed, WAA shall:

- Verify land ownership, land-use rights and any community or customary claims before works begin.
- Avoid land with active disputes unless resolved through lawful and documented means.

- Obtain written permission, resolutions, agreements or approvals appropriate to the land tenure type.
- Avoid impacts on homes, crops, grazing routes, community assets, water points, sacred sites and livelihoods.
- Document voluntary land contributions only where free from coercion and where affected persons understand implications.
- Ensure compensation or livelihood restoration is handled lawfully if unavoidable impacts arise.
- Avoid projects likely to require resettlement unless a specialist plan, legal approval and Board approval are obtained.

12. Biodiversity, Ecosystems, Forests and Watersheds

WAA's work in water access, watershed restoration, tree planting, school gardens and climate-smart agriculture shall strengthen ecosystem health and avoid degradation of sensitive habitats.

WAA shall:

- Avoid activities that damage protected areas, wetlands, riparian reserves, forests, wildlife habitats, wildlife corridors or critical biodiversity areas.
- Use native or ecologically appropriate species in tree planting and restoration unless a technical justification is documented.
- Avoid invasive species and monoculture approaches that may harm local ecosystems.
- Protect watersheds and recharge zones from erosion, pollution and over-abstraction.
- Integrate soil and water conservation measures in land restoration and agriculture activities.
- Consult relevant agencies such as NEMA, Kenya Forest Service, Kenya Wildlife Service, county governments and Water Resources Authority where applicable.
- Monitor survival rates for tree planting and restoration activities and report lessons learned.

13. Water Resources, WASH and Public Health

Because WAA uses water security as a platform for resilience, all water projects shall be designed to protect water resources, improve safe access and prevent public health risks.

WAA shall:

- Assess the sustainability of groundwater and surface-water sources before development or rehabilitation.
- Obtain required water permits and approvals before abstraction or construction where applicable.
- Protect boreholes and water points from contamination through proper siting, sanitary sealing, drainage and fencing where needed.
- Promote water-quality testing and treatment/filtration where required for drinking-water use.
- Ensure school and community WASH facilities are gender-responsive, safe, accessible and maintainable.
- Promote handwashing, hygiene education and safe water storage.
- Plan for operation and maintenance, including spare parts, local capacity and cost recovery where appropriate.
- Prevent stagnant water, open pits, unsafe construction areas and other hazards that may increase disease or injury risk.

14. Pollution Prevention, Waste and Resource Efficiency

WAA shall prevent pollution and apply resource efficiency throughout the project life cycle. This includes responsible handling of construction waste, drilling waste, oils, fuels, chemicals, packaging, solar equipment, batteries, electronics, plastic waste and office waste.

Minimum waste and pollution controls include:

- Avoid, reduce, reuse, repair, recycle, recover and safely dispose of waste in line with the waste hierarchy.
- Segregate hazardous, recyclable, organic and general waste where practical.
- Use licensed waste handlers for hazardous, e-waste, battery and chemical waste where required.
- Store fuels, oils and chemicals on impermeable surfaces with spill prevention measures.
- Prohibit disposal of drilling mud, cement, chemicals, oil or wastewater into rivers, schools, community land, drains or unapproved sites.
- Control dust, noise, erosion, vibration and runoff during construction.
- Use water, energy and materials efficiently and avoid unnecessary resource extraction.
- Document waste disposal and spill response for moderate, substantial and high-risk projects.

15. Climate Risk, Resilience and Disaster Preparedness

WAA shall mainstream climate adaptation and low-carbon development into project design. This is consistent with WAA's strategic ambition to become a Climate-Water-Health Nexus Platform and its focus on climate finance readiness.

Every infrastructure project shall consider relevant climate risks, including drought, water stress, flooding, erosion, heat, wind, lightning, changing rainfall patterns and climate-sensitive disease risks. Designs shall integrate appropriate resilience measures such as elevated components, drainage, erosion control, water storage, solarisation, redundancy, drought-resilient species and maintenance planning.

Projects shall promote low-carbon choices where feasible, including solar-powered water systems, energy-efficient equipment, local procurement where appropriate and reduced reliance on diesel generators.

16. Occupational and Community Health and Safety

WAA shall protect the safety and health of workers, contractors, learners, communities and visitors affected by its activities. No project shall proceed without basic safety planning proportional to its risk.

WAA and its contractors shall:

- Identify site hazards before works begin and prepare a safety plan.
- Provide appropriate personal protective equipment and enforce its use.
- Secure construction sites, borehole sites, excavations, open trenches, electrical installations and elevated structures.
- Maintain safe traffic and pedestrian controls around schools, communities and health facilities.
- Ensure only competent personnel handle drilling equipment, lifting operations, electrical works, solar systems, pumps, chemicals and machinery.
- Provide first-aid arrangements, emergency contacts and incident response procedures.
- Report serious injuries, near misses, fatalities, community incidents and dangerous occurrences immediately.
- Stop work when there is imminent danger to people or the environment.

17. Labour, Contractors and Supply Chain Safeguards

WAA shall require fair, safe and lawful labour practices across its activities. Contractors and suppliers shall be selected not only on cost and technical capacity but also on compliance with environmental, social, safety and ethical standards.

Contractors shall be required to:

- Comply with Kenyan labour and safety laws.
- Prohibit child labour, forced labour, exploitation, harassment and discrimination.
- Pay workers according to contract and applicable law.
- Provide safe working conditions and PPE.
- Comply with the site-specific ESMP and WAA Code of Conduct.
- Report incidents and grievances promptly.
- Respect communities, schools, cultural norms and vulnerable groups.
- Prevent sexual exploitation, abuse, harassment and intimidation.
- Manage waste, pollution, noise, dust and site restoration.

WAA may suspend payments, terminate contracts, remove personnel from site or report to authorities where contractors breach legal, safety, environmental or safeguarding obligations.

18. Gender, Disability, Youth and Vulnerable Groups

WAA shall identify and address differential impacts on women, girls, children, youth, persons with disabilities, older persons, pastoralists, refugees, minority groups and other vulnerable people. E&S screening shall assess who benefits, who may be excluded and who may face additional risk.

Projects shall:

- Include women and vulnerable groups in consultations and water governance structures.
- Ensure WASH facilities are safe, private, accessible and responsive to menstrual hygiene needs where relevant.
- Provide accessible meeting venues and communication formats where practical.
- Avoid increasing unpaid care burdens, water collection burdens or safety risks for women and children.
- Promote youth skills and local employment where appropriate.
- Apply safeguarding procedures when working in schools or with children and vulnerable adults.
- Track inclusion indicators in project monitoring where feasible.

19. Cultural Heritage and Local Knowledge

WAA shall respect cultural heritage, sacred sites, burial sites, traditional water points, community forests, cultural landscapes and local knowledge. Projects shall screen for cultural heritage risks during site selection and community consultation.

If cultural heritage or archaeological material is encountered unexpectedly, works shall stop in the affected area, the site shall be secured, community leaders and relevant authorities shall be notified, and works shall resume only after appropriate guidance is obtained. This is WAA's Chance Find Procedure.

20. Incident Reporting and Corrective Action

Environmental and social incidents shall be reported, investigated and corrected. Incident reporting is not punitive when made in good faith; it is a tool for prevention and learning.

Incident Type	Examples	Reporting Timeline
Critical	Fatality, serious injury, sexual exploitation/abuse, major spill, community violence, major contamination, serious child/vulnerable adult safeguarding incident.	Immediate verbal notification to Executive Director and ESS Focal Point; written report within 24 hours.
Major	Lost-time injury, significant grievance, contractor misconduct, unauthorized waste disposal, damage to community asset, repeated non-compliance.	Report within 48 hours. Corrective action plan within 7 days.
Moderate	Minor injury, near miss, dust/noise complaint, minor spill, PPE breach, minor waste management gap.	Report within 5 working days and close corrective action in project records.
Low	Routine observation, improvement suggestion, minor housekeeping issue.	Record in site visit or monitoring report.

Corrective actions shall identify the cause, immediate response, responsible person, deadline, budget implication and verification method. Critical incidents shall be reported to the Board or relevant committee and, where required, to regulators, donors and law enforcement.

21. Monitoring, Reporting, Audit and Learning

WAA shall monitor safeguards performance throughout the project cycle. Monitoring shall be practical, evidence-based and proportional to project risk.

Minimum monitoring requirements include:

- E&S screening records for all projects.
- ESMP implementation tracking for moderate, substantial and high-risk projects.
- Site inspections during construction or rehabilitation works.
- Contractor compliance checks and toolbox meeting records.
- Grievance logs and closure records.
- Incident reports and corrective action follow-up.
- Waste disposal, water-quality, permit and audit records where applicable.
- Quarterly internal reporting to management and relevant Board committees.
- Annual policy implementation review.

Findings from monitoring, audits, community feedback and incidents shall be used to improve WAA designs, procurement, contractor management, training and partner due diligence.

22. Records, Data Protection and Confidentiality

WAA shall keep accurate records of E&S screening, assessments, permits, ESMPs, meetings, grievances, incidents, corrective actions, monitoring reports, contractor compliance and audits. Records shall be securely stored and retained according to WAA's records management procedures and donor requirements.

Personal data collected during consultation, grievances, safeguarding referrals, health activities or community profiling shall be handled lawfully, fairly, confidentially and for legitimate project purposes

only. Sensitive data shall be restricted to authorised personnel and shall not be disclosed without lawful basis or appropriate consent, except where reporting is required to protect a person from harm or comply with the law.

23. Training and Capacity Building

WAA shall build environmental and social safeguards capacity across the organisation. Training shall be included in onboarding and repeated periodically, especially for staff and contractors working in schools, communities, construction sites, borehole sites and high-risk settings.

Training topics shall include:

- Overview of this policy and staff responsibilities.
- E&S screening and ESMP implementation.
- Stakeholder engagement and grievance handling.
- Safeguarding, sexual exploitation and abuse prevention, child protection and vulnerable adults protection.
- Gender equality, disability inclusion and community participation.
- Occupational and community health and safety.
- Waste management, spill response and pollution prevention.
- Climate risk and resilience measures.
- Incident reporting and whistleblowing pathways.

24. Non-Compliance and Sanctions

Non-compliance with this policy may result in corrective action, suspension of activities, contract remedies, disciplinary action, termination of contract or employment, referral to regulators or law enforcement, and recovery of losses where appropriate.

Examples of serious non-compliance include:

- Starting regulated works without required permits or approvals.
- Ignoring ESMP requirements or regulator licence conditions.
- Concealing incidents, injuries, spills, grievances or safeguarding concerns.
- Retaliating against complainants, whistleblowers or community members.
- Unsafe work practices that expose workers, learners or communities to serious harm.
- Illegal dumping, pollution or destruction of protected habitats.
- Use of child labour, forced labour, harassment, exploitation or discriminatory practices.
- Fraudulent environmental, safety, procurement or monitoring records.

25. Policy Review and Continuous Improvement

This policy shall be reviewed annually and whenever there are major changes in Kenyan law, donor requirements, WAA's operations, organisational structure or risk profile. The Executive Director shall coordinate the review with the ESS Focal Point and relevant committees. The Board shall approve material amendments.

The review shall consider project experience, audit findings, incident trends, grievance data, partner feedback, community feedback, legal updates and WAA's strategic plan implementation progress.

Annex 1. Environmental and Social Screening Checklist

This checklist shall be completed before project approval. Tick Yes/No/Not Applicable and explain any “Yes” answer that indicates risk.

Screening Area	Question / Information Required
Project description	Briefly describe activities, location, beneficiaries, implementing partners and duration.
Legal approvals	Will the project require NEMA approval, WRA permit, county approval, school approval, land-use approval or other licence?
Sensitive location	Is the site near a water body, wetland, forest, protected area, wildlife route, steep slope, school, health facility or densely populated area?
Land access	Will the project require land, easement, community land consent, access roads, construction space or use of private/community property?
Water resources	Will the project abstract groundwater/surface water, rehabilitate a borehole, install tanks, construct WASH facilities or affect drainage?
Construction risk	Will there be drilling, excavation, electrical works, elevated structures, machinery, traffic, noise, dust, fuel or hazardous materials?
Waste and pollution	Will the project generate drilling waste, construction waste, e-waste, batteries, chemical containers, sludge, wastewater or hazardous waste?
Biodiversity	Could the project affect vegetation, wetlands, forests, wildlife, riparian reserves, grazing routes or ecosystem services?
Community health and safety	Could learners, patients, communities or road users be exposed to injuries, open pits, unsafe water, traffic, disease vectors or electrical hazards?
Labour and contractors	Will contractors, casual labourers, suppliers or volunteers be engaged? Are there risks of unsafe work, child labour, harassment or unfair pay?
Gender and inclusion	Could women, girls, persons with disabilities, youth, older persons or minority groups be excluded or disproportionately affected?
Safeguarding	Will activities involve children, schools, vulnerable adults, household visits, data collection, photography or direct community support?
Cultural heritage	Is there any known sacred site, burial site, cultural landscape, historic structure or traditional water point near the project site?
Climate risk	Is the site exposed to drought, flooding, erosion, heat stress, wind, lightning or water scarcity?
Grievances	Is there an accessible channel for receiving and resolving complaints from workers and communities?

Annex 2. Risk Categorisation Guide

Category	Examples	Approval Level
Low	Desk research; ordinary meetings; office-based policy work; non-sensitive training in established venues.	Project Manager and ESS Focal Point.
Moderate	Small school garden; handwashing station; minor plumbing; small solar system on existing structure; community training with low safety risk.	Programme Lead and ESS Focal Point.

Category	Examples	Approval Level
Substantial	Borehole rehabilitation; new borehole; water distribution network; tanks; solar pumping; construction works; activities with contractors; community water points; high-traffic school projects.	Executive Director and relevant committee notification.
High	Works in protected or culturally sensitive areas; major water abstraction; potential displacement; unresolved land conflict; high risk of serious community harm; sensitive safeguarding risks; significant cumulative impacts.	Board approval; specialist assessment; regulator and donor clearance where applicable.

Annex 3. Environmental and Social Management Plan (ESMP) Template

Impact / Risk	Mitigation Measure	Responsible Person	Timeline	Budget	Monitoring Indicator
Dust, noise and disturbance	Water spraying, working hours, equipment maintenance, community notice.	Contractor / Project Manager	During works	Insert	No unresolved complaints; site inspection records.
Open pits / excavation hazard	Barricade, signage, supervision, safe backfilling.	Contractor	During works	Insert	No injuries; barricades present.
Waste disposal	Segregate waste; use approved disposal route; keep receipts.	Contractor / ESS Focal Point	During works	Insert	Waste log and disposal evidence.
Water contamination	Sanitary sealing, site drainage, safe storage of chemicals, water-quality testing.	Technical Lead	Design and operation	Insert	Water test results; no contamination events.
Community exclusion	Inclusive meetings, disability access, women/youth participation.	Community Engagement Lead	Throughout	Insert	Meeting records disaggregated by sex/age where feasible.
Worker safety	PPE, toolbox talks, competent workers, first aid, incident reporting.	Contractor / Project Manager	Throughout	Insert	Toolbox records; PPE compliance; incident log.

Annex 4. Stakeholder Engagement Register

Date	Stakeholder / Group	Location	Issues Raised	WAA Response / Action	Responsible Person	Status

Annex 5. Grievance Form

Field	Details
Grievance reference number	
Date received	
Name of complainant (optional)	
Contact details (optional)	
Preferred language / communication method	
Category	Environmental / social / safety / labour / safeguarding / procurement / other
Description of complaint	
Immediate risk? If yes, action taken	
Person assigned	
Proposed resolution / corrective action	
Deadline	
Closure date and confirmation	

Annex 6. Incident Report Form

Field	Details
Incident reference number	
Date, time and location	
Reported by	
Incident type	Injury / near miss / spill / grievance / safeguarding / property damage / community safety / other
Description of what happened	
People affected	
Immediate action taken	
Root cause / contributing factors	
Corrective action required	
Responsible person and deadline	
Regulator / donor / Board notification required?	
Closure verification	

Annex 7. Contractor Environmental and Social Code of Conduct

All contractors, subcontractors and suppliers engaged by WAA shall comply with the following minimum code of conduct:

- Respect all community members, learners, staff and visitors.
- Do not engage in sexual exploitation, abuse, harassment, intimidation, discrimination or violence.
- Do not employ children or use forced labour.
- Follow safety instructions, use PPE and stop unsafe work.
- Protect water sources, vegetation, community assets and cultural heritage.
- Do not dump waste, oils, fuels, chemicals or wastewater in unauthorised areas.
- Report spills, injuries, grievances, safeguarding concerns and environmental damage immediately.
- Use only approved work areas, access routes and disposal sites.

- Cooperate with WAA monitoring, audits and corrective actions.
- Comply with Kenyan laws, permits, WAA policies and project ESMP requirements.

Annex 8. Exclusion List

WAA shall not finance, support or knowingly participate in activities that involve:

- Forced labour, child labour, trafficking, sexual exploitation, abuse or harassment.
- Activities causing significant unmanaged harm to protected areas, critical habitats, wetlands, forests or wildlife corridors.
- Illegal logging, charcoal burning, wildlife trade or activities prohibited by conservation law.
- Projects requiring involuntary resettlement where there is no lawful, funded and approved resettlement or livelihood restoration plan.
- Pollution, waste disposal or hazardous material handling that violates Kenyan law or poses unacceptable risks.
- Projects on disputed land without evidence of lawful access and community/legal clearance.
- Activities that discriminate against women, persons with disabilities, minority groups, refugees, pastoralists or other vulnerable groups.
- Activities that violate NEMA, WRA, county government, occupational safety or public health requirements.
- Any activity that the Board determines is inconsistent with WAA's mission, values, legal obligations or safeguarding commitments.

Annex 9. Implementation Responsibilities Matrix

Activity	Responsible	Frequency / Timing	Evidence
Policy dissemination	Executive Director / ESS Focal Point	After approval and during onboarding	Signed acknowledgement forms, training records.
E&S screening	Project Manager with ESS Focal Point	Before project approval	Completed screening form.
Risk categorisation	ESS Focal Point	Before budgeting/procurement	Categorisation note and approval.
Permit review	Project Manager / Technical Lead	Before implementation	Permit tracker, licences, approvals.
ESMP preparation	Project Manager / ESS Focal Point	Before works begin	Approved ESMP and budget.
Contractor E&S clauses	Procurement / Finance / Project Manager	Before contract signature	Signed contract, code of conduct.
Community engagement	Community Engagement Lead / Project Manager	Design to closure	Stakeholder register, minutes, attendance.
Grievance handling	ESS Focal Point / Designated Officer	Ongoing	Grievance log and closure records.
Site inspection	Project Manager / ESS Focal Point	During implementation	Inspection checklist and photos.
Incident reporting	All staff and contractors	Immediate / as required	Incident report and corrective action log.
Quarterly safeguard report	ESS Focal Point	Quarterly	Report to management and committees.
Annual policy review	Executive Director / Committees	Annually	Review note and Board minutes.

Reference Framework

This policy is informed by WAA's Strategic Plan 2026-2030, WAA's internal governance and accountability commitments, Kenyan environmental and social legislation, and relevant donor safeguard expectations. The policy shall be read together with WAA's Finance Policy, Human Resource Policy, Safeguarding Policy, Gender Equality and Social Inclusion Policy, Anti-Fraud/Corruption and Whistleblowing Policy, Procurement procedures and project-specific donor agreements.

Key Kenyan reference laws include the Constitution of Kenya, 2010; Environmental Management and Co-ordination Act; Environmental (Impact Assessment and Audit) Regulations, 2003; Sustainable Waste Management Act, 2022; Water Act, 2016; Climate Change Act, 2016 and amendments; Occupational Safety and Health Act, 2007; Public Health Act; Land Act, 2012; Community Land Act, 2016; Physical and Land Use Planning Act, 2019; Forest Conservation and Management Act, 2016; Wildlife Conservation and Management Act, 2013; Employment Act, 2007; Children Act, 2022; Sexual Offences Act, 2006; Persons with Disabilities Act, 2003; Data Protection Act, 2019; and applicable county regulations.

PART 6

ANTI-FRAUD, CORRUPTION & WHISTLEBLOWING POLICY

Operational Manual Section

WATER ABUNDANCE AFRICA (WAA) ANTI-FRAUD, CORRUPTION AND WHISTLEBLOWING POLICY

2026-2030

Protecting integrity, donor confidence and community trust

Policy Commitment

WAA maintains zero tolerance for fraud, bribery, corruption, misuse of funds, financial misconduct and retaliation against whistleblowers. All WAA resources must be managed ethically, transparently and only for approved mission purposes.

Document owner	Executive Director / Finance, Audit and Risk Committee
Policy custodian	Finance and Corporate Services, with HR/Admin and Safeguarding/Integrity focal points
Applies to	Board members, committee members, staff, volunteers, consultants, interns, fellows, partners, suppliers, contractors, grantees and anyone acting for or on behalf of WAA
Effective date	Upon approval by the Board of Directors
Review cycle	Annual review, or earlier if required by law, donor requirements, audit findings or organisational growth
Version	Version 1.0 - July 2026

Legal note: This policy is designed for governance and operational use by WAA in Kenya. It should be reviewed by qualified Kenyan legal counsel before formal Board adoption, especially where donor agreements, public funds, cross-border programmes or criminal-reporting obligations apply.

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1. Policy Statement

Water Abundance Africa (WAA) is committed to the highest standards of integrity, transparency, accountability, stewardship and responsible management of resources. WAA will prevent, detect, investigate and respond to fraud, corruption, bribery, misappropriation, money laundering, false reporting, procurement abuse and all related misconduct.

WAA adopts a zero-tolerance approach to fraud, corruption and retaliation. Every allegation will be treated seriously, assessed promptly and handled fairly, confidentially and in accordance with Kenyan law, donor requirements, WAA governance instruments and applicable international good practice.

No programme outcome, funding opportunity, contract, partnership, operational pressure or instruction from a superior may be used to justify fraud, bribery, corruption or retaliation against a person who raises a concern in good faith.

2. Purpose and Objectives

The purpose of this policy is to protect WAA, its communities, donors, partners and staff from fraud and corruption risks while creating a safe system for reporting suspected wrongdoing.

- Set WAA's institutional standard on fraud, corruption and whistleblowing.
- Define prohibited conduct and expected ethical behaviour.
- Establish clear reporting channels for suspected fraud, bribery, corruption and financial misconduct.
- Protect whistleblowers, witnesses and complainants from retaliation, intimidation or victimisation.
- Guide investigation, evidence handling, confidentiality, case escalation and corrective action.
- Support donor confidence, regulatory compliance, public accountability and responsible stewardship of WAA resources.
- Ensure allegations are handled fairly, consistently and with respect for due process.

3. Scope and Applicability

This policy applies to all WAA operations, offices, field activities, projects, grants, partnerships, procurement processes, fundraising activities, research/data work, community engagements and digital systems in Kenya and any other country where WAA operates or has obligations.

- Board members, committee members and senior leadership.
- Employees, volunteers, interns, fellows, enumerators, casual workers and consultants.
- Suppliers, contractors, subcontractors, implementing partners, grantees, consortium members and agents.
- Visitors, advisers, trainers, technical partners and any person representing WAA.
- Any person reporting suspected fraud, corruption or related misconduct involving WAA resources or activities.

The policy covers conduct that occurs in WAA offices, project sites, community spaces, schools, health facilities, meetings, travel, online platforms, procurement processes, financial transactions and communications carried out for WAA business.

4. WAA Strategic and Governance Alignment

WAA's 2026-2030 strategy positions the organisation as a Climate-Water-Health Nexus Platform integrating water security, climate resilience, renewable energy, environmental stewardship, health, food systems, education and innovative finance. This policy supports that mission by strengthening the fiduciary, ethical and governance systems required to manage programmes at scale.

WAA's institutional strategy recognises that strong governance, skilled leadership, sound systems and a culture of accountability are essential for mobilising and responsibly managing significant resources. The policy therefore supports Board oversight, Finance/Audit/Risk supervision, internal controls, ethical conduct and staff accountability.

The policy also supports WAA's climate finance readiness by embedding fiduciary systems, procurement controls, financial controls, anti-fraud and integrity mechanisms, monitoring, evaluation and learning, and environmental and social safeguards into day-to-day operations.

5. Kenyan Legal and Regulatory Framework

This policy is guided by applicable Kenyan laws, regulations and public-interest standards, including the following, as amended from time to time:

Instrument	Policy relevance
Constitution of Kenya, 2010	National values, good governance, transparency, accountability, integrity, equality, non-discrimination, human dignity and protection of rights.
Bribery Act, 2016	Prevention, investigation and punishment of bribery; relevant to both public and private-sector conduct, including offers, requests, receipt or giving of improper advantages.
Anti-Corruption and Economic Crimes Act, 2003	Corruption, economic crimes, abuse of office, misappropriation, unexplained assets, compensation and recovery of benefits obtained through corrupt conduct.
Ethics and Anti-Corruption Commission Act, 2011	Mandate of EACC in promoting integrity standards, receiving complaints, investigating corruption, bribery and economic crimes, and recommending prosecution.
Proceeds of Crime and Anti-Money Laundering Act, 2009	Prevention and reporting of money laundering, handling proceeds of crime, suspicious transactions, asset tracing, freezing and confiscation.
Public Officer Ethics Act, Leadership and Integrity Act	Integrity obligations when WAA works with public officers, state agencies, public funds or county/national government programmes.
Public Procurement and Asset Disposal Act, 2015	Where applicable to public-funded activities, efficient procurement, transparency, competition, accountability and fair treatment of suppliers.
Public Finance Management Act, 2012	Where applicable to public funds, financial discipline, accountability and responsible management of public resources.
Employment Act, 2007	Employment discipline, fair administrative process, non-discrimination, termination standards and employee obligations.
Data Protection Act, 2019	Responsible processing and protection of personal data of whistleblowers, witnesses, staff, suppliers, beneficiaries and accused persons.
Penal Code and Criminal Procedure laws	Criminal offences such as theft, forgery, false accounting, obtaining by false pretence, conspiracy and related fraud offences.
Donor agreements and grant conditions	Financial reporting, procurement, fraud notification, audit, safeguarding, investigation cooperation and return or recovery of funds.

Where donor requirements are stricter than this policy, WAA will apply the stricter standard, provided it does not conflict with Kenyan law.

6. Definitions

Term	Meaning
Fraud	Any intentional deception, false representation, concealment, manipulation or abuse of position intended to obtain an unlawful benefit, avoid an obligation or cause loss to WAA, a donor, community member, partner or third party.
Corruption	Abuse of entrusted power, authority, influence or responsibility for private gain or improper advantage. It includes bribery, extortion, kickbacks, collusion, nepotism, patronage, embezzlement, favouritism and conflict-of-interest abuse.
Bribery	Offering, promising, giving, requesting, agreeing to receive or receiving a financial or other advantage intended to influence improper performance of a duty or function.
Whistleblower	A person who reports, in good faith or on reasonable grounds, suspected fraud, corruption, bribery, misuse of resources, breach of law, donor misconduct or retaliation.
Retaliation	Any direct or indirect adverse action taken against a person because they reported a concern, cooperated with an investigation or refused to participate in wrongdoing.
Conflict of interest	A situation where personal, family, financial, political, business or other interests may influence, appear to influence or compromise a person's WAA duties.
Facilitation payment	An unofficial payment or advantage intended to speed up or secure a routine action, approval, service or decision. WAA prohibits facilitation payments.
Protected disclosure	A report of suspected wrongdoing made through WAA channels, donors, regulators, law enforcement or other authorised channels where the reporter acts in good faith or has reasonable grounds for concern.

7. Guiding Principles

- **Zero tolerance:** Fraud, corruption, bribery and retaliation are prohibited regardless of value, seniority, relationship or project pressure.
- **Integrity and accountability:** All WAA resources must be used only for approved organisational and programme purposes.
- **Prevention first:** Controls, training, due diligence, segregation of duties and risk assessments must be embedded into operations.
- **Confidentiality:** Reports and investigations must be handled on a need-to-know basis.
- **Whistleblower protection:** Persons who raise concerns in good faith must be protected from retaliation.
- **Fairness and due process:** Accused persons will be treated fairly, with opportunity to respond, while preserving evidence and protecting witnesses.
- **Donor and legal compliance:** WAA will comply with applicable donor notification, audit, regulatory and law-enforcement obligations.
- **Continuous improvement:** Lessons from incidents, audits and reviews will be used to strengthen systems and reduce future risk.

8. Prohibited Conduct

The following conduct is prohibited whether attempted, actual, direct, indirect, online, offline, through a third party, or disguised through another transaction:

- Giving, receiving, soliciting or authorising bribes, kickbacks, facilitation payments or improper advantages.
- Misappropriating, stealing, diverting or unauthorisedly using WAA funds, donor resources, community assets, equipment, vehicles, supplies, data or project materials.
- Submitting false claims, false receipts, inflated invoices, duplicate invoices, fabricated quotations, false attendance sheets or fraudulent payroll, per diem or travel claims.
- Manipulating procurement, bid evaluations, supplier selection, contract awards, contract variations, inspection records or goods-received notes.
- Splitting purchases to avoid approval thresholds or competitive procurement requirements.
- Concealing conflicts of interest, related-party transactions, personal supplier interests or family relationships relevant to WAA decisions.
- Falsifying programme data, beneficiary records, monitoring reports, financial reports, bank reconciliations, timesheets, vehicle logs or inventory records.
- Using WAA position, assets, networks or confidential information for personal, political, commercial or family benefit.
- Receiving undisclosed commissions, gifts, favours, hospitality, discounts or advantages from suppliers, public officers, partners or beneficiaries.
- Obstructing audits, destroying records, intimidating witnesses or interfering with investigations.
- Money laundering, dealing with proceeds of crime, terrorist financing, diversion of funds or transactions involving sanctioned parties.
- Retaliating against, threatening, harassing, demoting, dismissing, blacklisting or otherwise harming whistleblowers, witnesses or persons who refuse to engage in wrongdoing.

9. Roles and Responsibilities

Role	Responsibility
Board of Directors	Approve this policy; set the tone at the top; ensure WAA has effective integrity, audit, whistleblowing and anti-fraud systems; receive serious case reports and approve major sanctions or external action where required.
Finance, Audit and Risk Committee	Oversee fraud-risk management, internal controls, audit findings, investigation independence, recovery actions, whistleblower protection and reporting to the Board.
Executive Director	Lead implementation; ensure adequate resources, training and reporting channels; authorise preliminary assessments and investigations; report serious matters to the Board/Committee and donors/regulators where required.
Finance and Corporate Services	Maintain controls over budgets, bank accounts, reconciliations, procurement payments, asset registers, donor funds, supporting documents and financial reports; flag irregularities promptly.
HR and Administration	Ensure staff declarations, recruitment screening, disciplinary procedures, non-retaliation protection, training records and exit processes are implemented.
Safeguarding/Integrity Focal Point	Receive reports, support confidential case intake, coordinate protection measures and maintain secure case records as assigned.
Managers and Project Leads	Identify fraud risks, enforce controls, ensure correct documentation, monitor partners and suppliers, support investigations and prevent retaliation.

Staff, volunteers and consultants	Follow the policy, declare conflicts, protect WAA resources, refuse bribes, report suspected wrongdoing and cooperate with investigations.
Suppliers, partners and contractors	Comply with WAA's integrity requirements, cooperate with due diligence and audits, disclose conflicts, and report suspected misconduct involving WAA resources.

10. Prevention and Internal Controls

WAA will maintain practical prevention systems proportional to its scale, funding levels, donor obligations and operating risks.

10.1 Core controls

- Approved annual budgets and project budgets with clear budget holders.
- Segregation of duties between requesting, approving, procuring, receiving, recording and paying.
- Written procurement thresholds, competitive quotation/tender processes and documented evaluation criteria.
- Two-person approval and dual authorisation for payments, bank transactions and material financial commitments.
- Monthly bank reconciliations and petty cash reconciliations reviewed by someone independent of the preparer where practicable.
- Asset registers, stores records, vehicle/fuel logs, stock controls and periodic physical verification.
- Signed conflict-of-interest, confidentiality and code-of-conduct declarations.
- Donor budget compliance checks before expenditure is incurred.
- Documented approval of advances, imprests, per diems and retirement of advances within defined timelines.
- Secure filing of receipts, invoices, contracts, delivery notes, attendance sheets, grant agreements and audit evidence.

10.2 Risk-based controls

- Fraud-risk assessment during project design, grant negotiations, procurement planning and partner onboarding.
- Supplier and partner due diligence, including ownership, capacity, sanctions, conflict checks and past-performance review.
- Pre-award and post-award reviews for high-value contracts, sensitive procurements and cash-transfer activities.
- Community verification of key deliverables where appropriate, especially for water infrastructure, WASH assets and school/community support.
- Independent audit or review of high-risk projects, donor-funded activities and serious allegations.

11. Gifts, Hospitality, Conflicts of Interest and Facilitation Payments

11.1 Gifts and hospitality

WAA personnel must not give or receive gifts, hospitality, travel, entertainment, commissions, favours or advantages that may influence, appear to influence or reward a WAA decision. Any permitted token gift of modest value must be declared in the Gift and Hospitality Register.

- Cash gifts, mobile money gifts, personal loans, commissions, kickbacks and secret discounts are prohibited.
- Gifts from bidders, suppliers, contractors, grant applicants or persons seeking WAA decisions are prohibited during active procurement or award processes.

- Hospitality must be reasonable, transparent, directly related to WAA business and approved where required.
- Any gift that cannot be accepted must be politely refused, returned or surrendered to WAA for appropriate disposal.

11.2 Conflicts of interest

All covered persons must disclose actual, potential or perceived conflicts of interest immediately and before participating in a decision. A person with a conflict must withdraw from related discussions, evaluations, approvals or payments unless an approved mitigation plan is documented.

11.3 Facilitation payments

WAA prohibits facilitation payments, informal payments and unofficial advantages to speed up services, approvals, travel clearances, licensing, inspections, community access, procurement, tax matters or any other process. Where a payment is demanded under threat to life, safety or liberty, the person should prioritise safety and report the incident as soon as possible.

12. Procurement, Grants, Partnerships and Supplier Integrity

Procurement and partner engagement are high-risk areas for fraud and corruption. WAA will promote fairness, transparency, value for money, conflict disclosure and proper documentation at each stage.

- All procurement must be based on approved need, available budget, clear specifications and documented approval.
- Competitive procurement must be used according to WAA thresholds unless a justified and approved exception applies.
- Supplier evaluations must be based on pre-defined criteria such as price, quality, experience, delivery capacity, compliance and value for money.
- No staff member may solicit personal benefits, side payments or future employment from suppliers, applicants or partners.
- Contracts must include anti-fraud, anti-bribery, audit, termination and cooperation clauses proportionate to risk and donor requirements.
- Payments must only be made against approved contracts, purchase orders, invoices, delivery notes, work completion evidence and budget coding.
- Partners, grantees and sub-grantees must maintain records and report suspected fraud promptly.
- WAA may suspend payments, withhold funds, terminate contracts, blacklist suppliers or report misconduct where integrity breaches occur.

13. Reporting and Whistleblowing Channels

Any person may report suspected fraud, corruption, bribery, financial misconduct, procurement abuse, conflict-of-interest breaches, donor fund misuse or retaliation. Reports may be made openly, confidentially or anonymously.

13.1 Internal reporting channels

- Immediate supervisor or project manager, unless implicated.
- Executive Director.
- Finance and Corporate Services lead or Finance, Audit and Risk Committee representative.
- HR/Admin or Safeguarding/Integrity Focal Point.
- Board Chair or Chair of the Finance, Audit and Risk Committee for allegations involving senior management.
- Dedicated email, hotline, secure form or complaints box once formally established by WAA.

13.2 External reporting

Where required by law, donor agreement or the seriousness of the allegation, WAA may report matters to the relevant authorities, including the Ethics and Anti-Corruption Commission, police/Directorate of Criminal Investigations, Office of the Director of Public Prosecutions, Financial Reporting Centre, Registrar/regulator, donor offices or other competent bodies.

13.3 Information to include

- What happened, when and where it happened.
- Names or descriptions of persons involved, witnesses and affected projects.
- Relevant documents, transaction references, mobile money/payment references, invoices, photos or emails.
- Any immediate risk to evidence, funds, beneficiaries, whistleblowers, witnesses or WAA reputation.
- Whether the matter has been reported elsewhere.

A report does not need to be proven at the point of reporting. Reasonable suspicion or concern is enough.

14. Protection of Whistleblowers and Witnesses

WAA will protect whistleblowers, witnesses and persons who cooperate with investigations from retaliation, intimidation, discrimination, harassment, demotion, dismissal, threats, blacklisting, adverse transfer, denial of benefits or any other reprisal.

- Reports will be handled confidentially and shared only with persons who need the information for protection, assessment, investigation, legal advice, donor reporting or regulatory action.
- Anonymous reports will be assessed on the available facts and evidence.
- Whistleblowers will not be punished for good-faith reports that are not substantiated after investigation.
- Knowingly false, malicious or bad-faith reports may be subject to disciplinary or contractual action.
- Where there is risk to life, safety, liberty or court testimony, WAA will consider referral to competent authorities or witness protection mechanisms.
- Retaliation itself is misconduct and may result in disciplinary action, contract termination and reporting to authorities or donors.

15. Investigation and Case Management Procedure

Investigations must be prompt, impartial, evidence-based, confidential and fair. They must protect funds, records, witnesses and the rights of persons implicated.

Stage	Required action
1. Receipt and logging	Receive report, acknowledge where possible, assign case number, record basic facts and protect confidentiality.
2. Triage and risk assessment	Assess urgency, safety, evidence risk, donor notification requirements, financial exposure, seniority of implicated persons and need for immediate controls.
3. Preliminary assessment	Determine whether the matter is within scope, whether immediate suspension of payments/access is needed, and whether a full investigation is justified.
4. Investigation planning	Define allegations, evidence needed, investigator(s), timelines, confidentiality protocols, interview plan and reporting line.
5. Evidence preservation	Secure documents, emails, payment records, contracts, asset records, devices, inventories and other relevant evidence.
6. Interviews and analysis	Interview reporter, witnesses and implicated persons; analyse documents, transactions, controls and timelines.
7. Findings and report	Prepare written findings on balance of evidence, quantify loss, identify control weaknesses, recommend action and document limitations.
8. Decision and action	Management/Board Committee approves corrective actions, sanctions, recovery, donor notification, external reporting and system improvements.
9. Closure and learning	Close the case, securely file records, update risk register, implement lessons learned and monitor retaliation risk.

Where senior leadership or Board members are implicated, the case must be escalated directly to the Board Chair or the appropriate Board Committee, and independent external investigation support should be considered.

16. Corrective Action, Sanctions and Recovery

Where fraud, corruption, bribery or retaliation is substantiated, WAA may take proportionate action consistent with law, contracts, donor requirements and due process.

- Written warning, disciplinary action, suspension, termination or removal from role.
- Contract termination, supplier disqualification, partner suspension, debarment or blacklisting subject to due process.
- Recovery of funds, assets, equipment, overpayments, losses, legal costs or damages.
- Referral to EACC, police/DCI, ODPP, FRC, regulators, professional bodies, donors or other authorities where required or appropriate.
- Correction or withdrawal of false reports, financial statements, donor claims or programme data.
- Strengthening of controls, additional training, independent audit, management action plans and monitoring.

Disciplinary or contractual action does not prevent WAA from pursuing civil recovery, insurance claims, donor notification, regulatory reporting or criminal complaint where applicable.

17. Data Protection, Records and Confidentiality

Fraud and whistleblowing records may contain sensitive personal data. WAA will process such data lawfully, fairly, securely and only for legitimate purposes related to reporting, protection, investigation, donor compliance, legal action and institutional learning.

- Case files must be held in secure physical or electronic folders with restricted access.
- Names of whistleblowers, witnesses and accused persons must not be disclosed unnecessarily.
- Personal data must be shared externally only where legally required, contractually required, necessary for investigation/protection, or with appropriate safeguards.
- Records must be retained according to law, donor agreements and WAA records-retention rules, normally for at least seven years after case closure unless a longer period is required.
- Investigation records must not be destroyed, altered, concealed or removed without authority.

18. Training, Communication and Monitoring

WAA will communicate this policy to all covered persons and integrate anti-fraud and whistleblowing standards into onboarding, contracts, procurement documents, partner agreements, grants and staff performance expectations.

- Annual staff and Board orientation on fraud risks, corruption prevention and whistleblower protection.
- Project-specific briefings for high-risk grants, fieldwork, cash activities and procurement teams.
- Partner and supplier integrity clauses, declarations and training where appropriate.
- Regular review of fraud-risk indicators, audit findings, complaints data and investigation outcomes.
- Annual reporting to the Board on fraud-risk management, cases, trends, control improvements and training completed, while preserving confidentiality.

19. Policy Review and Approval

This policy shall be reviewed annually by management and the Finance, Audit and Risk Committee, and approved by the Board of Directors. Earlier review may be required following material fraud incidents, audit findings, donor recommendations, changes in Kenyan law, organisational restructuring or expansion into new countries.

Prepared by	Management / Governance, Risk and Compliance Function
Reviewed by	Executive Director and Finance, Audit and Risk Committee
Approved by	Board of Directors
Next review	Within 12 months of approval, then annually

Annex A: Staff, Board and Partner Integrity Declaration

I confirm that I have read and understood the WAA Anti-Fraud, Corruption and Whistleblowing Policy. I agree to comply with it and to report suspected fraud, corruption, bribery, conflict of interest, misuse of resources or retaliation involving WAA.

Name	
Position / organisation	
Relationship to WAA	Staff / Board / consultant / supplier / partner / volunteer / other
Conflict declared	Yes / No. If yes, attach details and mitigation plan.
Signature	
Date	

Annex B: Whistleblowing and Suspected Fraud Reporting Form

Field	Details
Date of report	
Reporter name and contact (optional)	
Confidentiality preference	Open / Confidential / Anonymous
Project / office / location	
Persons involved	
Description of concern	What happened? When? Where? How was it discovered?
Evidence available	Invoices, receipts, emails, photos, bank/mobile-money references, witnesses, assets, reports.
Immediate risks	Safety, evidence loss, ongoing payments, donor deadlines, beneficiary impact.
Has this been reported elsewhere?	Yes / No. Provide details if yes.
Received by	

Annex C: Investigation Register Template

Case no.	Date received	Allegation	Risk level	Assigned lead	Status	Closure/action

Annex D: Minimum Anti-Fraud Controls Checklist

- ☐ Annual budget and project budgets approved.
- ☐ Delegation and approval matrix current and communicated.
- ☐ Supplier and partner due diligence completed for high-risk engagements.
- ☐ Conflict-of-interest declarations signed and updated.
- ☐ Procurement files contain quotations/tender records, evaluations and approvals.
- ☐ Payments supported by invoice, contract/PO, delivery or completion evidence and budget coding.
- ☐ Bank reconciliations completed monthly and independently reviewed.
- ☐ Petty cash/imprest retired on time and reconciled.
- ☐ Asset register updated and physical verification conducted.
- ☐ Whistleblowing channels communicated to staff, partners and communities.
- ☐ Fraud-risk register reviewed at least quarterly for high-risk projects.
- ☐ Audit recommendations tracked until closure.

PART 7

MONITORING, EVALUATION, ACCOUNTABILITY & LEARNING (MEAL) POLICY AND PROCEDURES

Operational Manual Section

WATER ABUNDANCE AFRICA (WAA) Monitoring, Evaluation, Accountability & Learning (MEAL) Policy and Procedures 2026–2030

Water • Climate • Health • Prosperity

Organisation	Water Abundance Africa (WAA)
Policy title	Monitoring, Evaluation, Accountability & Learning (MEAL) Policy and Procedures
Policy period	2026–2030
Version	Draft 1.0
Effective date	Upon Board approval
Policy owner	Executive Director / Programmes & Impact Committee / MEAL Function
Review cycle	Annual review, with full revision at least every three years or as required by law, donor requirements, or organisational growth

Policy status: Draft for internal review and Board approval.

Policy Approval and Control

Role	Name	Signature	Date
Prepared by	MEAL / Programmes Team		
Reviewed by	Executive Director		
Reviewed by	Programmes & Impact Committee		
Approved by	Board of Directors		

Document Control

Version	Date	Description of change	Approved by
1.0	2026	Initial MEAL Policy developed to support WAA Strategic Plan 2026–2030, donor reporting, accountability, learning and evidence-based programme management.	Board of Directors

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1. Introduction and Policy Statement

Water Abundance Africa (WAA) is an African development platform focused on integrated solutions that strengthen water security, climate resilience, renewable energy, public health, environmental sustainability and inclusive economic growth. This Monitoring, Evaluation, Accountability and Learning (MEAL) Policy establishes the organisational rules, standards, responsibilities and procedures for tracking results, demonstrating accountability, learning from implementation and improving programme quality across WAA's work.

WAA adopts a Climate–Water–Health Nexus approach in which water security is treated as an entry point for wider community resilience, better health, food security, renewable energy, education, environmental stewardship and sustainable livelihoods. The MEAL system shall therefore track both direct project outputs and wider development outcomes across WAA's integrated programme portfolio.

WAA commits to using evidence to improve programme decisions, protect communities and beneficiaries, uphold donor and legal compliance, support transparency and ensure that programme learning strengthens future design, implementation and scale-up.

Policy statement

All WAA programmes, projects, partnerships and institutional initiatives shall have proportionate MEAL systems that define expected results, collect reliable and ethical data, protect personal information, promote community accountability, track value for money, capture lessons, and use evidence for decision-making.

2. Purpose, Objectives and Scope

2.1 Purpose

The purpose of this Policy is to institutionalise a consistent MEAL system that enables WAA to measure progress, demonstrate impact, strengthen accountability to communities and donors, and adapt programmes based on evidence and lessons learned.

2.2 Objectives

- Establish clear standards for monitoring, evaluation, accountability, learning, reporting and knowledge management.
- Ensure that WAA programmes have theories of change, results frameworks, indicators, baselines, targets, data collection tools and reporting schedules.
- Promote transparent reporting to communities, partners, donors, government and the Board.
- Protect the rights, safety, dignity, privacy and participation of beneficiaries, especially children, women, youth, persons with disabilities and vulnerable adults.
- Improve data quality, evidence use, adaptive management and organisational learning.
- Support resource mobilisation by demonstrating measurable impact, institutional capability and responsible use of resources.

2.3 Scope

This Policy applies to all WAA Board members, management, employees, volunteers, interns, consultants, contractors, enumerators, partner organisations and any other persons collecting, handling, analysing, reporting or using programme data on behalf of WAA. It applies to all WAA programmes and projects in

Kenya and, where WAA operates regionally or globally, subject to host-country laws, donor requirements and international good practice.

3. Legal and Regulatory Framework in Kenya

WAA shall implement MEAL activities in accordance with applicable Kenyan laws, regulations, donor obligations, contracts, ethical standards and internal policies. The following legal and regulatory instruments are particularly relevant to MEAL practice:

Legal / regulatory reference	MEAL relevance for WAA
Constitution of Kenya, 2010	Guides WAA's commitments to human dignity, equality and non-discrimination, public participation, accountability, access to information, privacy and protection of vulnerable groups.
Public Benefits Organizations Act, 2013 and applicable PBO regulatory requirements	Guides governance, public benefit accountability, lawful registration, compliance and reporting obligations for public benefit organisations operating in Kenya.
Data Protection Act, 2019 and applicable Data Protection Regulations	Requires lawful, fair, transparent and secure processing of personal data, including personal data collected during surveys, registrations, beneficiary verification, monitoring and evaluations.
Access to Information Act, 2016	Guides access to information and responsible disclosure where WAA performs public interest work, uses public resources, or holds information of significant public interest, while observing legal exemptions and confidentiality.
Children Act, 2022	Guides child protection, child participation, best interests of the child and ethical engagement where programmes involve schools, learners and children.
Persons with Disabilities Act and related disability inclusion laws	Guides reasonable accommodation, accessibility and non-discrimination in data collection, community feedback, meetings, reporting and programme participation.
Employment Act, 2007 and Occupational Safety and Health Act, 2007	Guides safe, non-discriminatory and fair working conditions for staff, volunteers, enumerators and consultants undertaking MEAL activities.
Environmental Management and Co-ordination Act, Water Act, Climate Change Act and related sector laws	Guide environmental and social monitoring, environmental compliance, water-resource reporting, climate data and safeguards related to WAA infrastructure and resilience projects.
Anti-Corruption and Economic Crimes Act, Bribery Act and Proceeds of Crime and Anti-Money Laundering Act	Guide integrity, fraud prevention, procurement monitoring, financial accountability and whistleblowing in relation to data, reports and project evidence.

Where donor requirements are stricter than this Policy, the stricter standard shall apply, provided it does not conflict with Kenyan law.

4. Definitions and MEAL Principles

4.1 Definitions

Term	Meaning
Monitoring	Continuous tracking of implementation, outputs, activities, budgets, timelines, quality standards and performance indicators.
Evaluation	Periodic and objective assessment of relevance, effectiveness, efficiency, impact, sustainability, coherence,

Term	Meaning
	equity and value for money.
Accountability	Transparent communication, beneficiary participation, feedback, complaints handling, donor reporting, audit response and responsible use of resources.
Learning	The systematic capture, analysis, sharing and use of evidence, lessons and experience to improve current and future programming.
Indicator	A measurable sign of progress, output, outcome, impact, quality or performance.
Baseline	The starting value or situation before programme implementation begins.
Target	The planned result or performance level WAA expects to achieve within a defined period.
Means of verification	The source or evidence used to confirm indicator progress, such as reports, registers, photos, GIS records, water-quality tests, sensor data, survey data or financial records.
Beneficiary data	Personal or household-level information collected from people who participate in or benefit from WAA programmes.

4.2 MEAL Principles

Principle	Application
Usefulness	MEAL information must serve practical decision-making, programme improvement, accountability and learning.
Integrity	Data and reports must be truthful, verifiable, complete and free from manipulation.
Participation	Communities, schools, local institutions and beneficiaries should participate in defining needs, tracking progress and validating findings.
Equity and inclusion	Data collection and analysis shall be gender-responsive, disability-inclusive and sensitive to children, youth, older persons and marginalised groups.
Do no harm	MEAL activities shall not expose participants to harm, stigma, discrimination, retaliation or unnecessary burden.
Confidentiality and privacy	Personal and sensitive data shall be handled securely and only used for legitimate programme purposes.
Independence and objectivity	Evaluations and verification processes shall be impartial and, where appropriate, carried out by persons not directly responsible for implementation.
Adaptive learning	WAA shall use evidence to adjust workplans, improve delivery and strengthen future programmes.

5. Governance, Roles and Responsibilities

MEAL is an institutional responsibility. It connects governance, programme quality, finance, risk management, safeguarding, communications and resource mobilisation. The following responsibilities shall apply:

Role / body	Responsibility
Board of Directors	Approve the MEAL Policy, receive annual performance and

Role / body	Responsibility
	impact reports, ensure accountability, and provide oversight on risk, quality and strategic performance.
Programmes & Impact Committee	Provide oversight on programme quality, MEAL, innovation, technical excellence and learning; review major evaluation findings and management responses.
Finance, Audit & Risk Committee	Review financial accountability, internal control findings, audit issues, fraud risks, value-for-money concerns and risk information emerging from MEAL.
Executive Director	Ensure MEAL is resourced, implemented and used for decision-making; approve annual MEAL plans and institutional reports before submission or publication.
MEAL Lead / MEAL Officer	Develop MEAL plans, indicator reference sheets, tools, data quality systems, evaluations, dashboards, learning products and donor reports.
Programme Managers	Ensure project-level monitoring, field verification, partner reporting, output tracking, adaptive management and timely data submission.
Finance and Administration Team	Track budgets, expenditure, asset data, value for money and financial documentation required for integrated programme reporting.
Safeguarding / HR / GESI Focal Persons	Ensure MEAL activities comply with safeguarding, informed consent, child protection, gender equality, disability inclusion and ethics requirements.
Partners and Contractors	Collect and report data in line with WAA tools, donor requirements, confidentiality obligations, ethical standards and agreed timelines.
Communities and Beneficiaries	Participate in feedback, validation, community scorecards, learning forums and accountability mechanisms.

6. WAA MEAL System and Results Architecture

WAA's MEAL system shall be built around the organisation's theory of change, strategic objectives, programme results frameworks, annual workplans, budgets and donor agreements. Each programme shall maintain a project-level MEAL plan that links activities, outputs, outcomes, indicators, baselines, targets, data sources, frequency, responsible persons and reporting requirements.

6.1 Core MEAL Tools

- Theory of Change or logical framework for each major programme.
- Results framework with outputs, outcomes, indicators, baselines, targets and means of verification.
- MEAL plan or performance monitoring plan.
- Indicator reference sheet for each key performance indicator.
- Data collection tools, survey forms, checklists, digital forms and consent scripts.
- Data quality assurance and field verification checklist.
- Feedback, complaints and response log.
- Learning agenda and lessons log.
- Evaluation Terms of Reference and management response template.
- Monthly, quarterly, annual, donor and Board reporting templates.

6.2 WAA Institutional Indicator Areas

Area	Illustrative indicators	Frequency
Water security	People served; water reliability; system performance; boreholes rehabilitated or constructed; storage capacity; functionality rate.	Quarterly / project-specific
Climate resilience	Hectares restored; watershed protection actions; climate adaptation plans; resilience indicators; climate-risk screening.	Biannual / annual
Renewable energy	Solar-powered systems installed; energy generated; CO2e avoided; facilities powered; functionality and maintenance performance.	Quarterly
Health, WASH and schools	Facilities supported; learners and communities reached; safe water access; handwashing coverage; WASH outcomes and user satisfaction.	Quarterly
Food systems and livelihoods	Households adopting climate-smart practices; school gardens established; nutrition indicators; green jobs and enterprises supported.	Biannual / annual
Climate finance and partnerships	Funds mobilised; proposals submitted; investment pipeline; co-finance leveraged; strategic partnerships developed.	Quarterly / annual
Institutional development	Audit outcomes; staff retention; governance compliance; policies adopted; safeguarding and complaints management performance.	Annual

6.3 Indicator Disaggregation

All beneficiary-facing indicators shall be disaggregated where practical and ethical by sex, age group, disability status, location, school/community category and vulnerability status. Disaggregation shall be proportionate to programme needs and shall not collect more personal data than necessary. Where sensitive data is collected, consent, confidentiality and data protection standards shall apply.

7. Monitoring Procedures

7.1 Monitoring Planning

47. Every project shall develop a MEAL plan during inception and before full implementation begins.
48. Each activity shall be linked to an approved workplan, budget line, output and indicator.
49. Baseline data shall be collected before implementation where required by programme design, donor agreement or institutional strategy.
50. Monitoring frequency shall be based on risk, project duration, donor requirements and the nature of outputs being tracked.

7.2 Field Monitoring

51. Field visits shall verify activity completion, quality of delivery, beneficiary participation, safeguarding standards, community feedback, asset condition and implementation risks.

52. Field monitoring shall use standard checklists and produce written visit reports with findings, photos where appropriate, GPS coordinates where relevant, action points and responsible persons.
53. Programme teams shall validate reported results against primary records such as attendance registers, completion certificates, installation reports, water test reports, beneficiary lists, supplier records and financial documentation.
54. Any serious issue, including safeguarding concerns, fraud indicators, environmental or social harm, or major delivery delays, shall be escalated immediately through the relevant policy channels.

7.3 Monitoring Frequency

Monitoring activity	Minimum frequency	Responsible lead
Activity progress update	Monthly	Programme Manager / Project Officer
Budget and expenditure review	Monthly	Finance Team and Programme Manager
Output verification	Monthly or after activity completion	Programme Team / MEAL Lead
Field monitoring visit	Quarterly or risk-based	MEAL Lead / Programme Manager
Partner data review	Monthly or quarterly	MEAL Lead / Partnership Lead
Community feedback review	Monthly	Accountability Focal Person / MEAL Lead
Management review meeting	Quarterly	Executive Director
Board / committee performance review	Quarterly or biannual	Programmes & Impact Committee

8. Evaluation Procedures

Evaluations shall be used to assess whether WAA programmes are relevant, effective, efficient, impactful, sustainable, inclusive, climate-smart and aligned to WAA's strategic purpose. Evaluations shall be planned from the design stage and budgeted where donor or programme scale requires.

8.1 Types of Evaluation

Evaluation type	Purpose
Baseline assessment	Conducted at programme inception to establish starting conditions, needs, risks, targets and community priorities.
Formative / process evaluation	Conducted during implementation to improve quality, solve bottlenecks and strengthen adaptive management.
Mid-term evaluation	Conducted for multi-year programmes to assess progress and recommend course correction.
Final evaluation	Conducted at project closure to assess results, lessons, sustainability and accountability.
Independent impact evaluation	Commissioned for large or strategic programmes where objectivity and credibility are required.
After-action review	Conducted after major activities, emergencies, pilots or incidents to capture practical lessons.

8.2 Evaluation Standards

55. Terms of Reference shall define the evaluation purpose, scope, criteria, methodology, sampling, ethics, deliverables, timeline, dissemination plan and budget.
56. Evaluators shall be selected based on competence, independence, ethics, experience, value for money and absence of conflict of interest.
57. Evaluation findings shall be evidence-based, balanced, gender-responsive, disability-inclusive and respectful of community voices.

58. Management shall prepare a written response to key recommendations, including actions, responsibilities and timelines.
59. Learning from evaluations shall be shared internally and, where appropriate, with communities, donors, government and partners.

8.3 WAA Strategic Evaluation Schedule

Evaluation / review	Timing	Purpose
Baseline assessment	Programme inception	Establish starting point and targets.
Annual performance review	Every year	Assess annual progress, risks, learning and workplan adjustments.
Mid-term strategic review	2028	Review progress under the 2026–2030 strategy and recommend adaptation.
Independent impact evaluation	2030	Assess WAA's strategic impact, outcomes and sustainability.
Next strategy development	2030	Use evidence and learning to prepare the 2031–2035 strategy.

9. Accountability and Feedback Mechanisms

WAA shall maintain accountability mechanisms that enable communities, schools, partners, staff and other stakeholders to access information, provide feedback, raise complaints, and receive timely responses without fear of retaliation. Accountability is part of programme quality, safeguarding and public trust.

9.1 Minimum Accountability Standards

60. Communities and stakeholders shall be informed about programme objectives, eligibility criteria, planned activities, expected outputs, available feedback channels and relevant safeguarding commitments.
61. Feedback channels shall be accessible to women, men, youth, children where appropriate, persons with disabilities, older persons and marginalised groups.
62. Complaints shall be logged, categorised, acknowledged, investigated where required, resolved within a reasonable timeframe and closed with documented action.
63. Serious complaints involving safeguarding, fraud, corruption, abuse, exploitation, discrimination, data breach or intimidation shall be escalated immediately through the applicable WAA policy and legal channels.
64. WAA shall periodically analyse feedback trends to improve programme design and implementation.

9.2 Feedback Channels

- Community meetings, barazas, school forums and beneficiary validation sessions.
- Community scorecards and satisfaction surveys.
- Phone, email, SMS, WhatsApp or designated contact points, subject to data protection rules.
- Suggestion boxes or confidential complaint forms at project sites where practical.
- Partner and government review meetings.
- Staff reporting channels, safeguarding channels and whistleblowing channels.

10. Learning and Knowledge Management

Learning is a core purpose of MEAL. WAA shall not collect data only for compliance; it shall use evidence to improve decision-making, strengthen programme models, mobilise resources, influence policy and support replication across Africa and the Global South.

10.1 Learning Agenda

- Which water, energy, WASH and climate-resilience models are most effective and affordable for schools, health facilities and vulnerable communities?
- What factors improve long-term functionality of boreholes, solar-water systems, rainwater harvesting, storage and water-quality interventions?
- How do gender equality, youth engagement, disability inclusion and local ownership affect programme sustainability?
- Which financing, maintenance and community governance models improve sustainability after donor funding ends?
- How can digital systems, GIS, IoT, dashboards and AI-assisted analysis improve water, climate and health decision-making while protecting privacy?
- What evidence should WAA produce to influence county, national, regional and donor investment decisions?

10.2 Learning Products

- Annual impact and learning report.
- Programme learning briefs and case studies.
- Policy briefs and investment cases.
- Community feedback summaries.
- Evaluation reports and management responses.
- Technical notes on water, WASH, renewable energy, climate resilience, food systems, health and livelihoods.
- Dashboards and public-facing non-sensitive knowledge products.

10.3 Learning Events

Programme teams shall hold quarterly learning reviews to discuss progress, data quality, community feedback, risks, budget performance, safeguarding issues, lessons and corrective actions. Strategic learning forums may be held with government, donors, communities, universities, private-sector actors and civil society partners where appropriate.

11. Data Management, Protection and Ethics

WAA shall treat programme data as an organisational asset and a responsibility. All personal and sensitive information shall be collected lawfully, used only for legitimate programme purposes, protected from unauthorised access and retained only for as long as necessary under law, donor agreements and WAA retention schedules.

11.1 Data Collection Standards

65. Collect only data that is necessary for programme design, monitoring, evaluation, accountability, safeguarding, reporting or legal compliance.
66. Explain the purpose of data collection to participants in language they understand and obtain informed consent or appropriate assent/guardian consent where children are involved.
67. Avoid collecting sensitive personal data unless necessary and approved by the MEAL Lead and relevant senior management.
68. Use inclusive and accessible methods, including reasonable accommodation for persons with disabilities and safe participation for children and vulnerable adults.
69. Avoid coercive data collection; programme benefits shall not be unfairly conditioned on disclosure of unnecessary personal information.
70. Do not publish identifiable beneficiary information, photos, case stories or GPS-sensitive data without appropriate consent and risk review.

11.2 Data Security

71. All digital datasets shall be stored in approved, access-controlled systems.
72. Paper records shall be kept in locked cabinets or secure project files.
73. Only authorised staff and partners shall access personal or sensitive data on a need-to-know basis.
74. Data shared with donors, government or partners shall be anonymised or aggregated unless identifiable disclosure is lawful, necessary and approved.
75. Data backups shall be maintained for critical MEAL information.
76. Suspected data breaches shall be reported immediately to management and handled in line with the Data Protection Act and WAA data protection procedures.

11.3 Digital MEAL Systems

WAA may use mobile field data collection, GIS mapping, cloud-based programme management, dashboards, IoT-enabled water monitoring, remote sensing and AI-assisted analysis. Human oversight shall be maintained for AI-supported analysis, and no automated tool shall replace ethical judgment, consent, data protection, safeguarding review or contextual validation.

12. Reporting, Quality Assurance and Use of Evidence

12.1 Reporting Schedule

Report	Frequency	Prepared by	Audience
Activity completion report	After activity	Project Officer / Programme Manager	Programme Team / MEAL Lead
Monthly progress update	Monthly	Programme Manager	Executive Director / Management Team
Budget versus actual report	Monthly	Finance Team	Executive Director / Programme Manager
Quarterly programme report	Quarterly	Programme Manager and MEAL Lead	Board committees / donors / partners as required
Community accountability summary	Quarterly / biannual	MEAL Lead / Accountability Focal Person	Communities / management / partners
Annual impact and learning report	Annually	MEAL Lead / Communications / Executive Director	Board, partners, donors, public where approved

Report	Frequency	Prepared by	Audience
Evaluation report	As planned	Evaluator / MEAL Lead	Management, Board, donors, partners, communities as appropriate

12.2 Data Quality Assurance

WAA shall apply five minimum data quality dimensions: validity, reliability, completeness, timeliness and integrity. The MEAL Lead shall establish proportionate checks based on project risk and donor requirements.

77. Review data collection tools before use and pilot-test major survey tools.
78. Train enumerators and partners on definitions, consent, confidentiality and tool use.
79. Conduct spot checks, back checks and field verification where appropriate.
80. Compare reported results with source documents, photos, GPS records, attendance registers, financial records and community validation.
81. Maintain an audit trail for indicator calculations and report submissions.
82. Document assumptions, limitations and data-quality concerns in reports.

12.3 Use of Evidence

83. Programme managers shall use monitoring data to update workplans and resolve implementation bottlenecks.
84. Management shall use quarterly reports to make decisions on staffing, budgets, risk management and partnerships.
85. Board committees shall use MEAL findings to oversee strategy, programme quality, resource use and risk.
86. Resource mobilisation teams shall use verified evidence, case studies and impact data to prepare proposals and investment cases.
87. Communications teams shall use only approved, accurate, consented and non-misleading evidence in public materials.

13. Risk Management and Safeguarding in MEAL

MEAL processes can create risks if they collect sensitive information, engage vulnerable participants, expose confidential feedback, create unrealistic expectations, or produce inaccurate evidence. WAA shall manage these risks proactively.

Risk	Mitigation
Data privacy breach	Limit personal data, apply consent, restrict access, anonymise where possible, use secure storage and report breaches promptly.
Safeguarding risk during data collection	Train enumerators, apply child-safe and survivor-centred approaches, use safe referral pathways and never interview children on sensitive matters without proper safeguards.
Manipulation of results	Maintain audit trails, separation of duties, independent verification, management review and disciplinary action for falsification.
Exclusion of vulnerable groups	Apply inclusive sampling, accessible tools, reasonable accommodation and community validation.
Retaliation for complaints	Protect complainant confidentiality, restrict access to complaint data and escalate serious complaints safely.

Risk	Mitigation
Poor-quality data	Train teams, pilot tools, conduct spot checks and document limitations.
Misuse of photos or stories	Obtain informed consent, review safeguarding risks, avoid identifying children or vulnerable persons unnecessarily.

13.1 Prohibited Conduct in MEAL

- Falsifying, inflating, suppressing or manipulating monitoring data, evaluation findings, photos, signatures, attendance lists, GPS records or beneficiary information.
- Collecting personal or sensitive information without legitimate purpose, consent or approval.
- Using beneficiary data for political, commercial, personal or unrelated purposes.
- Threatening, coercing, bribing or misleading respondents or beneficiaries.
- Disclosing confidential complaints, safeguarding information or whistleblower identities without authorisation.
- Publishing identifiable photos, stories or personal data without approval and consent.

14. Policy Compliance, Review and Continuous Improvement

14.1 Compliance

Compliance with this Policy is mandatory. Breaches may result in corrective action, suspension of data collection activities, contract termination, disciplinary measures, repayment of ineligible costs, notification to donors or regulators, or legal action depending on the nature and seriousness of the breach.

14.2 Training and Capacity Building

WAA shall provide MEAL orientation to relevant staff, partners, consultants and enumerators. Training shall cover the MEAL framework, indicators, data quality, digital tools, informed consent, confidentiality, safeguarding, GESI, complaints handling, reporting and use of evidence.

14.3 Review

This Policy shall be reviewed annually and updated when there are changes in WAA's strategy, Kenyan laws, donor requirements, organisational structure, digital systems, safeguarding standards or lessons from implementation. A full review shall occur at least every three years or before the next strategic planning cycle.

14.4 Related WAA Policies

- Finance Policy and Procedures.
- Human Resource Policy and Procedures.
- Safeguarding / Child and Vulnerable Adults Protection Policy.
- Gender Equality and Social Inclusion Policy.
- Environmental and Social Safeguards Policy.
- Anti-Fraud, Corruption and Whistleblowing Policy.
- Data Protection and Information Security Procedures, once adopted.
- Procurement Policy and Code of Conduct, once adopted.

15. Annexes and Tools

Annex 1: MEAL Plan Template

Result / output	Indicator	Baseline	Target	Data source	Frequency	Responsible person

Annex 2: Indicator Reference Sheet Template

Field	Description
Indicator name	
Definition	
Unit of measure	
Disaggregation	Sex, age, disability, location, facility, vulnerability group, or other relevant category
Baseline and target	
Data source / means of verification	
Collection method	
Collection frequency	
Responsible person	
Quality checks	
Data protection considerations	

Annex 3: Data Quality Assurance Checklist

- ☐ Tool has been reviewed and approved before data collection.
- ☐ Enumerators have been trained and signed confidentiality commitments.
- ☐ Consent script was used and participant questions were answered.
- ☐ Sample or respondent list is appropriate and inclusive.
- ☐ Data is complete, accurate and submitted on time.
- ☐ Source documents are filed and traceable.
- ☐ Data has been checked for duplicates, outliers and inconsistencies.
- ☐ Sensitive data is stored securely with restricted access.
- ☐ Findings have been validated with communities or programme teams where appropriate.
- ☐ Limitations and assumptions have been documented.

Annex 4: Feedback and Complaints Log Template

Date	Channel	Complainant category	Issue type	Risk level	Action taken	Responsible person	Status

Annex 5: Learning Log Template

Date	Programme / project	Lesson identified	Evidence source	Decision / action required	Responsible person	Follow-up date

Annex 6: Evaluation Terms of Reference Checklist

- ☐ Evaluation title and background.
- ☐ Purpose, users and intended use of findings.
- ☐ Scope, evaluation questions and evaluation criteria.
- ☐ Methodology, sampling and data collection methods.
- ☐ Ethical considerations, consent and safeguarding requirements.
- ☐ GESI and disability inclusion considerations.
- ☐ Deliverables, timeline and quality assurance process.
- ☐ Evaluator qualifications and independence requirements.
- ☐ Budget and logistics arrangements.
- ☐ Dissemination plan and management response process.

Annex 7: Monthly / Quarterly Report Structure

- Executive summary.
- Progress against outputs, outcomes and indicators.
- Activity implementation status.
- Beneficiary reach and disaggregation.
- Budget performance and variance explanation.
- Safeguarding, GESI and environmental/social safeguards update.
- Feedback, complaints and response update.
- Risks, issues and mitigation actions.
- Lessons learned and adaptive management decisions.
- Photos, case studies and annexed evidence where approved and consented.
- Action plan for the next reporting period.

References

- Water Abundance Africa Strategic Plan 2026–2030.
- Water Abundance Africa 2026–2028 Strategic Plan and School Resilience Hub Concept materials.
- Constitution of Kenya, 2010.
- Public Benefits Organizations Act, 2013 and applicable PBO regulatory guidance.
- Data Protection Act, 2019 and applicable regulations.
- Access to Information Act, 2016.
- Children Act, 2022.
- Persons with Disabilities legislation applicable in Kenya.
- Employment Act, 2007.
- Environmental, water, climate, public health, anti-corruption and occupational safety legislation applicable to WAA programmes.

- Donor agreements, grant conditions and sector-specific reporting requirements applicable to each programme.

PART 8

EXPANDED GOVERNANCE MANUAL AND BOARD CHARTER

Operational Manual Section

8.1 Purpose of the Governance Manual

This section strengthens WAA's institutional governance framework for Board adoption, fiduciary oversight, strategic leadership, ethical management and donor/climate-finance readiness. It is intended to guide the Board, committees, Executive Director, management and staff in carrying out their roles in a transparent, accountable and documented manner.

- Provide clear Board and committee responsibilities for strategic leadership, fiduciary oversight, risk management, safeguarding, ethics, programme quality and institutional sustainability.
- Establish decision-making, delegation, documentation and reporting procedures suitable for a growing public-benefit and donor-funded organisation.
- Ensure governance evidence is available for audits, donor due diligence, climate-finance accreditation or readiness assessments and Board performance reviews.
- Create practical tools for meetings, resolutions, committee reporting, conflict-of-interest management and policy implementation.

8.2 Governance Principles

Principle	Application in WAA Governance
Accountability	Clear responsibility for decisions, funds, assets, programme outcomes, safeguarding, risk and compliance.
Transparency	Timely records, minutes, reports, disclosures and stakeholder communication.
Integrity	Zero tolerance for fraud, corruption, abuse, exploitation, harassment and misuse of authority.
Stewardship	Responsible use of resources entrusted by communities, donors, partners, government and the public.
Inclusion	Gender equality, youth participation, disability inclusion and meaningful engagement of affected communities.
Evidence-based decisions	Use of data, MEAL findings, risk analysis, financial information and lessons learned to guide Board action.
Sustainability	Long-term institutional resilience, climate responsibility, environmental stewardship and financial viability.

8.3 Board Charter

The Board of Directors provides strategic leadership, fiduciary oversight, policy approval, risk governance, institutional accountability and supervision of executive leadership. The Board does not manage day-to-day operations; it ensures that management operates within approved strategy, law, budgets, policies, donor agreements and ethical standards.

Board Responsibility	Minimum Requirement
Strategic leadership	Approve strategic plans, annual priorities, institutional positioning, major partnerships and scaling decisions.
Fiduciary oversight	Approve budgets, audited statements, major contracts, bank mandates, reserves, financial policies and investment/readiness decisions.
Policy approval	Approve core policies, manuals, delegated authority matrices and any major changes to governance systems.
Executive oversight	Recruit, supervise, support and evaluate the Executive Director, including performance objectives and succession planning.

Risk and compliance	Oversee enterprise risk, safeguarding, legal compliance, fraud controls, data protection and donor obligations.
Stakeholder accountability	Ensure annual reporting, community accountability, donor reporting and public-interest accountability are maintained.

8.4 Board Committees and Terms of Reference

Board committees support detailed oversight and make recommendations to the full Board. Committees do not replace Board authority unless delegated by Board resolution. Each committee shall keep minutes, maintain an action tracker and submit reports to the Board.

Committee	Core Mandate	Meeting Frequency
Finance, Audit & Risk Committee	Financial oversight, internal controls, audit, procurement oversight, enterprise risk, reserves, compliance and investment readiness.	Quarterly or as needed
Governance, Human Capital & Ethics Committee	Board performance, HR oversight, ethics, safeguarding, succession, staff welfare, GESI and policy compliance.	Quarterly or as needed
Programmes & Impact Committee	Programme quality, MEAL, safeguarding integration, evidence, innovation, technical excellence, learning and beneficiary accountability.	Quarterly or as needed
Resource Mobilisation & Partnerships Committee	Fundraising pipeline, donor engagement, climate-finance readiness, partnerships, ESG/private-sector relations and external positioning.	Quarterly or as needed

8.5 Board Meeting SOP

Step	Procedure	Required Evidence
1. Annual calendar	Board Secretary / Executive Director prepares annual Board and committee calendar.	Approved Board calendar.
2. Agenda setting	Board Chair and Executive Director agree agenda with committee inputs.	Agenda and Board pack checklist.
3. Board pack circulation	Papers circulated at least 5 working days before meeting unless urgent.	Agenda, minutes, reports, decision papers.
4. Meeting conduct	Chair confirms quorum, conflicts of interest, agenda adoption and decision process.	Signed attendance and minutes.
5. Decisions	Resolutions recorded clearly with responsible person and deadline.	Board resolution register.
6. Follow-up	Action tracker updated and reviewed at next meeting.	Action tracker and committee reports.

8.6 Conflict of Interest and Related-Party Governance

All Board members, staff, consultants and representatives must disclose actual, potential or perceived conflicts of interest. A conflicted person shall not participate in evaluation, approval or oversight of the related decision unless the Board determines that participation is necessary and properly controlled.

- Annual conflict-of-interest declarations shall be completed by Board members and senior staff.

- Transaction-specific declarations shall be completed for procurement, recruitment, grants, partnerships and consultant engagements.
- All related-party transactions require documented justification, independent review and approval by the Board or delegated committee.
- The conflict-of-interest register shall be maintained by the Executive Director or assigned governance officer and reviewed by the Governance, Human Capital & Ethics Committee.

8.7 Board Performance and Annual Governance Review

Review Area	Minimum Assessment Criteria
Board composition	Skills, independence, gender balance, technical diversity, availability and term limits.
Meeting effectiveness	Quality of agendas, attendance, timely papers, decision clarity and action follow-up.
Committee effectiveness	Clear mandates, reports, minutes, action trackers and compliance oversight.
Risk oversight	Review of risk register, audit findings, safeguarding incidents, fraud risks and regulatory changes.
Strategy and impact	Board guidance on mission, resource mobilisation, partnerships, learning and long-term sustainability.

PART 9

STANDARD OPERATING PROCEDURES AND IMPLEMENTATION PROCEDURES

Operational Manual Section

9.1 Policy Approval, Rollout and Training SOP

Step	Procedure	Required Evidence
Drafting	Policy owner prepares draft using legal, donor and operational inputs.	Draft policy, review notes, version control.
Management review	Executive Director and relevant functions review practicality and resource implications.	Management comments and implementation plan.
Committee review	Relevant Board committee reviews risks, compliance, donor readiness and governance implications.	Committee recommendation.
Board approval	Board approves policy by resolution.	Signed resolution and policy approval page.
Rollout	Staff and partners are oriented on policy requirements.	Attendance records and signed acknowledgements.
Monitoring	Policy owner reports compliance and exceptions annually.	Compliance report and update log.

9.2 Annual Planning and Budgeting SOP

Step	Procedure	Required Evidence
Strategic review	Review strategic plan, prior-year performance, risks and donor commitments.	Planning memo.
Workplan preparation	Programme teams prepare workplans, procurement plans and activity budgets.	Annual workplans and budgets.
Finance consolidation	Finance consolidates budgets and cash flow projections.	Budget pack.
Management review	Executive Director reviews feasibility and alignment.	Reviewed draft budget.
Committee review	Finance, Audit & Risk Committee reviews budget and recommends to Board.	Committee minutes.
Board approval	Board approves budget before implementation.	Board resolution.
Monthly monitoring	Finance and programme teams review budget-versus-actual reports.	Variance reports.

9.3 Procurement and Contracting SOP

Step	Procedure	Required Evidence
Need identification	Programme lead prepares purchase request linked to approved workplan and budget.	Purchase requisition.
Budget check	Finance confirms project code, budget line and availability of funds.	Budget clearance.
Sourcing method	Apply procurement threshold and donor rules.	RFQ/RFP/quotations/sole-source justification.
Evaluation	Evaluation panel reviews proposals and declares conflicts.	Evaluation report.
Approval	Approving authority approves supplier based on matrix.	Approval record.

Contracting	Issue purchase order/contract with deliverables, price, safeguarding, ESS and anti-fraud clauses.	Signed contract/PO.
Delivery and payment	Confirm delivery before payment; retain all supporting documents.	GRN/completion certificate/payment voucher.

9.4 Financial Payment SOP

Step	Procedure	Required Evidence
Payment request	Requester submits complete payment package.	Payment voucher and attachments.
Finance review	Finance verifies budget, documents, supplier legitimacy and tax treatment.	Reviewed voucher.
Approval	Authorized signatories approve according to authority matrix.	Approval signatures.
Payment execution	Payment made by traceable method and dual approval where applicable.	Proof of payment.
Recording	Transaction recorded in accounting system and coded to project/activity.	Ledger entry.
Filing	Documents stored by project, month and transaction number.	Audit file.
Reconciliation	Bank, mobile money and petty cash accounts reconciled monthly.	Signed reconciliation.

9.5 Recruitment and Onboarding SOP

Step	Procedure	Required Evidence
Approval to recruit	Confirm approved position, budget and job description.	Recruitment approval form.
Advertisement	Advertise internally/externally as appropriate.	Advert and shortlist criteria.
Shortlisting	Use objective criteria and declare conflicts.	Shortlist and panel declarations.
Interviews and checks	Conduct interviews, technical tests, references and safeguarding checks.	Interview scores and reference notes.
Offer and contract	Issue written offer and contract after approval.	Signed contract.
Induction	Orient on policies, safeguarding, GESI, anti-fraud, ESS, data and safety.	Induction checklist and signed code.
Probation review	Review performance and conduct before confirmation.	Probation review form.

9.6 Safeguarding Incident Response SOP

Step	Procedure	Required Evidence
Receive concern	Any staff member receives concern and prioritises safety.	Safeguarding report form.
Immediate risk assessment	Safeguarding Focal Person assesses urgent protection needs.	Risk and referral note.
Referral	Refer to appropriate protection, medical, psychosocial, legal or	Referral record.

	statutory services where required.	
Case management	Maintain survivor-centred, confidential and documented process.	Case log.
Investigation decision	Management/Board determines investigation pathway and donor notification where applicable.	Investigation decision note.
Corrective action	Implement disciplinary, contractual, operational and risk-mitigation actions.	Action plan.
Learning	Review root causes and improve controls without disclosing confidential information.	Safeguarding learning note.

9.7 Environmental and Social Screening SOP

Step	Procedure	Required Evidence
Initial screening	Screen every project for environmental, social, health, safety, land, water, biodiversity, climate and safeguarding risk.	E&S screening checklist.
Risk categorisation	Classify low, moderate, substantial or high risk.	Risk category record.
Assessment	Determine need for EIA, ESMP, stakeholder plan, permits or specialist studies.	Assessment decision.
Mitigation plan	Integrate mitigation measures, budget and responsibilities into project design.	ESMP / mitigation plan.
Stakeholder engagement	Consult affected communities and disclose relevant information.	Stakeholder register.
Monitoring	Track safeguards implementation and incidents.	Monitoring reports.
Closeout	Verify mitigation, lessons and unresolved obligations.	Closeout report.

9.8 MEAL and Donor Reporting SOP

Step	Procedure	Required Evidence
Results framework	Develop indicators, baselines, targets and means of verification.	MEAL plan.
Data collection	Collect accurate, ethical, gender/disability-disaggregated data where appropriate.	Data tools and database.
Data quality review	Verify completeness, consistency and reliability.	Data quality checklist.
Analysis and learning	Analyse progress, challenges, value for money and lessons.	Learning brief.
Reporting	Submit narrative and financial reports aligned with donor timelines.	Donor report.
Feedback	Share accessible findings with communities and partners.	Feedback records.
Adaptive action	Update workplans, risks and budgets	Management action tracker.

	based on evidence.	
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PART 10

DONOR AND CLIMATE-FINANCE READINESS FRAMEWORK

Operational Manual Section

10.1 Purpose

WAA's strategy requires the organisation to demonstrate institutional readiness for grants, blended finance, climate finance, public-private partnerships, research collaborations and ESG partnerships. This section converts donor expectations into practical governance and management requirements that WAA can evidence during due diligence, proposal development, accreditation-readiness reviews and audits.

10.2 Readiness Pillars

Readiness Pillar	Minimum Evidence Required	Primary Custodian
Legal and governance status	Registration records, constitution, Board minutes, committee terms, policies, approvals and annual reports.	Board Secretary / Executive Director
Fiduciary management	Audited accounts, budgets, bank controls, procurement records, asset registers, segregation of duties and grant compliance files.	Finance Manager
Environmental and social safeguards	E&S policy, screening tools, ESMPs, grievance mechanism, incident register, stakeholder engagement records and contractor clauses.	E&S Focal Point
Gender and inclusion	GESI policy, sex/age/disability data, inclusion plans, accessible engagement, gender action plans and non-discrimination records.	HR / Programmes
Safeguarding and PSEA	Safeguarding policy, safe recruitment records, training, reporting channels, case management and survivor-centred referrals.	Safeguarding Focal Person
Anti-fraud and integrity	Whistleblowing channels, fraud register, investigation protocols, declarations, procurement conflict checks and sanctions records.	Finance, Audit & Risk Committee
MEAL and evidence	Theory of change, indicators, baselines, data quality assurance, beneficiary feedback, evaluations, impact stories and learning reports.	MEAL Function
Data protection and digital systems	Data inventory, consent tools, access controls, backups, retention schedules, privacy notices and incident response procedures.	Executive Director / ICT Lead
Climate rationale and adaptation evidence	Climate risk screening, vulnerability analysis, water-climate-health nexus evidence, adaptation benefits and resilience indicators.	Programmes & Impact Team
Sustainability and exit planning	Operations and maintenance plans, community ownership, financial sustainability, partner capacity and long-term monitoring.	Programme Managers

10.3 Donor Due Diligence File Index

- Legal registration documents, constitution/by-laws and Board membership records.
- Board minutes, resolutions, committee reports and conflict-of-interest register.

- Approved strategic plan, annual workplans, budgets and resource mobilisation pipeline.
- Audited financial statements, management accounts, bank reconciliation samples and finance policy.
- Procurement policy, procurement files, supplier register and contract templates.
- Safeguarding, GESI, ESS, anti-fraud/whistleblowing and MEAL policies with training evidence.
- Risk register, internal audit or compliance review reports and management action tracker.
- Project concept notes, theory of change, logical frameworks, results reports and evaluation findings.
- Evidence of community engagement, grievance handling, stakeholder feedback and accountability mechanisms.
- Climate-finance readiness evidence: E&S screening, climate risk analysis, gender action plan, fiduciary controls and sustainability plans.

10.4 Climate-Finance Proposal Readiness Checklist

Proposal Area	Minimum Standard for WAA Submission
Problem and climate rationale	Climate risk, water insecurity, health/food/livelihood impacts and vulnerable group analysis documented.
Theory of change	Clear pathway from finance to activities, outputs, outcomes and climate-resilient impact.
Economic and social benefits	Beneficiary reach, jobs, health, education, gender, livelihoods and resilience benefits quantified where possible.
Environmental and social risk	Screening completed; ESMP, stakeholder plan and grievance mechanism developed where required.
Gender and inclusion	GESI analysis, accessibility measures, gender action plan and disaggregated indicators included.
Fiduciary capacity	Budget, procurement plan, cash flow, audit trail, bank controls and financial reporting capacity demonstrated.
Sustainability	Operations and maintenance, community ownership, institutional partners and post-project financing identified.
Monitoring and learning	Indicators, baselines, targets, reporting schedule, learning plan and data protection measures established.
Risk management	Technical, climate, fiduciary, safeguards, delivery and reputational risks with mitigation measures.
Co-financing and partnerships	Partner roles, co-financing commitments and MoUs documented.

10.5 Grant Acceptance and Start-Up SOP

Step	Procedure	Evidence
1. Grant review	Review donor agreement, budget, restrictions, reporting dates, procurement, audit, safeguarding and visibility requirements.	Grant review checklist.
2. Risk assessment	Assess financial, legal, operational, reputational, safeguards and cash flow risks.	Grant risk note.
3. Approval to accept	Executive Director recommends acceptance; Board/committee approval where required.	Approval record.
4. Project code setup	Finance creates project code, budget lines, bank/sub-account if needed and filing system.	Project finance setup record.

5. Kick-off meeting	Programme, finance, HR, procurement, MEAL, safeguards and partners agree responsibilities.	Kick-off minutes and action tracker.
6. Compliance calendar	Map reports, audits, reviews, donor approvals and milestone dates.	Compliance calendar.
7. Start-up orientation	Train staff and partners on donor rules and WAA policies.	Attendance and signed acknowledgements.

PART 11

INSTITUTIONAL TEMPLATES, REGISTERS AND GOVERNANCE TOOLS

Operational Manual Annexes

11.1 Master Register Index

Register / Tool	Purpose	Custodian
Board resolution register	Records all Board and committee decisions, responsible persons and deadlines.	Board Secretary
Policy register	Tracks approved policies, owners, review dates, changes and staff orientation.	Executive Director
Delegated authority register	Lists approved approval thresholds, signatories, exceptions and updates.	Finance Manager
Conflict-of-interest register	Records annual and transaction-specific declarations and mitigation decisions.	Governance Committee
Risk register	Tracks strategic, operational, financial, safeguarding, E&S, climate and reputational risks.	Executive Director / FAR Committee
Donor/grant register	Tracks donor agreements, budgets, restrictions, reports, audits and compliance dates.	Finance Manager
Procurement register	Tracks procurement processes, vendors, values, approvals and contract status.	Procurement/Finance
Asset register	Tracks assets by tag, value, custodian, location, condition, funding source and disposal.	Finance Manager
Safeguarding incident register	Confidential record of safeguarding concerns, actions, referrals and closure.	Safeguarding Focal Person
Complaints and feedback register	Records community/stakeholder complaints, response actions and closure.	MEAL/Programmes
Whistleblowing/fraud case register	Confidential record of fraud reports, investigations, findings and actions.	FAR Committee / ED
Training register	Tracks staff, Board and partner trainings on policies, safeguarding, GESI, ESS, MEAL and finance.	HR/Admin
Partner due diligence register	Tracks partner screening, agreements, risk ratings and compliance follow-up.	Partnerships Lead
Climate-finance readiness register	Tracks readiness evidence, gaps, actions, owners and due dates.	Resource Mobilisation Committee

11.2 Board Resolution Register Template

Resolution No.	Date	Decision / Resolution	Responsible Person	Deadline	Status

11.3 Conflict of Interest Declaration Template

Field	Details
Name	

Role / organisation	
Declaration type	Annual / transaction-specific
Conflict declared	Yes / No
Details of actual, potential or perceived conflict	
Mitigation / recusal action	
Declaration signature and date	
Reviewed by	

11.4 Risk Register Template

Risk ID	Risk Description	Category	Likelihood	Impact	Mitigation	Owner / Status

11.5 Donor Grant Compliance Register Template

Donor	Project	Amount	Start/End Date	Reports Due	Audit / Special Conditions	Status

11.6 Policy Implementation Tracker Template

Policy / SOP	Owner	Training Completed	Registers Active	Compliance Issues	Next Review Date

11.7 Partner Due Diligence Checklist

- Legal registration and governance documents verified.
- Leadership, ownership and conflict-of-interest screening completed.
- Financial management and procurement capacity reviewed.
- Safeguarding, GESI, anti-fraud and ESS requirements accepted in writing.
- Past performance, references and sanctions checks completed where relevant.
- Data protection and confidentiality requirements included in agreement.
- Workplan, budget, reporting schedule and audit access agreed.
- Risk rating assigned and approved before engagement.

11.8 Climate-Finance Readiness Gap Register Template

Readiness Area	Evidence Available	Gap Identified	Action Required	Owner	Deadline

PART 12

BOARD ADOPTION, IMPLEMENTATION ROADMAP AND COMPLIANCE CHECKLIST

Operational Manual Section

12.1 Board Adoption Package

The following adoption package is recommended for use when presenting the Operational Manual to the Board for approval. It is intended to create a clear audit trail demonstrating that the Board reviewed the manual, confirmed delegated authorities, and directed management to implement the handbook.

Board Pack Item	Purpose
Board paper	Short note explaining purpose, changes, risks, adoption decision requested and implementation plan.
Final manual	Clean Board approval version with cover, document control, contents, policy sections, SOPs, annexes and templates.
Resolution	Board resolution approving the Manual and authorising management rollout.
Delegation confirmation	Board confirmation of procurement, finance, HR and bank approval thresholds.
Training plan	Schedule for staff, partner and Board committee orientation.
Compliance report template	Annual policy compliance and readiness reporting template.

12.2 90-Day Implementation Roadmap

Timeline	Action	Required Output
Days 1-15	Board approval, document control update, effective date insertion and circulation of controlled copy.	Approved manual and circulation memo.
Days 16-30	Management assigns policy owners, register custodians and SOP focal points.	Implementation responsibility matrix.
Days 31-45	Staff orientation on finance, HR, safeguarding, GESI, ESS, anti-fraud and MEAL requirements.	Training attendance and policy acknowledgements.
Days 46-60	Activate core registers: risk, conflict, procurement, grant, asset, safeguarding, complaints, policies and training.	Registers opened and owners assigned.
Days 61-75	Review active projects against donor/climate-finance readiness checklist and close priority compliance gaps.	Readiness gap register.
Days 76-90	Submit first implementation status report to Board committees.	Board committee compliance report.

12.3 Annual Board Compliance Certification

At least once each year, management should submit a compliance certification to the Board confirming the status of the Operational Manual implementation. The certification should be supported by evidence from registers, training records, audits, financial reports, MEAL reports, safeguarding logs and donor compliance files.

Compliance Area	Certification Statement	Status
Policy implementation	All core policies communicated, staff oriented and acknowledgements filed.	Yes / No / Partial

Finance controls	Budgets, reconciliations, payments, procurement and asset controls implemented.	Yes / No / Partial
HR compliance	Contracts, personnel files, leave, performance, disciplinary and statutory records maintained.	Yes / No / Partial
Safeguarding	Focal person designated, reporting channels active, cases handled confidentially and training completed.	Yes / No / Partial
GESI	Inclusion measures integrated into programmes, employment, procurement and reporting.	Yes / No / Partial
ESS	Project screening, ESMPs, permits, GRM and incident reporting active where required.	Yes / No / Partial
Anti-fraud	Whistleblowing channels active, declarations completed and fraud risks monitored.	Yes / No / Partial
MEAL	Indicators, baselines, reporting, feedback and learning processes implemented.	Yes / No / Partial
Donor readiness	Grant files, due diligence evidence, climate-finance readiness tools and audit trails maintained.	Yes / No / Partial

12.4 Management Certification

We certify that the Operational Manual has been implemented to the extent indicated in the annual compliance report, and that material gaps, exceptions, incidents and corrective actions have been disclosed to the relevant Board committees.

Role	Name	Signature	Date
Executive Director			
Finance Manager / Corporate Services Lead			
Human Resources and Administration Lead			
Safeguarding Focal Person			
MEAL / Programmes Lead			

12.5 Controlled Document Statement

This Operational Manual becomes effective only after formal Board approval. Controlled copies shall be maintained by the Executive Director or designated custodian. Uncontrolled printed or shared copies must be verified against the latest approved version before use. Any substantive policy amendment must be documented in the policy register and approved according to the delegated authority matrix.

Annexes - Additional Board and Management Tools

Annex H: Board Meeting Agenda Template

Field / Checklist Item	Details / Status / Notes
Opening and quorum confirmation	
Declaration of conflicts of interest	
Approval of agenda	
Approval of previous minutes	
Matters arising and action tracker	
Executive Director report	
Finance and audit report	
Programmes and impact report	
Governance, HR and ethics report	
Risk, safeguarding and compliance report	
Decisions and resolutions	
Any other business	
Date of next meeting	

Annex I: Board Paper Template

Field / Checklist Item	Details / Status / Notes
Title of paper	
Decision requested	
Background and rationale	
Strategic alignment	
Financial implications	
Legal and compliance implications	
Safeguarding/GESI/ESS implications	
Risks and mitigation	
Options considered	
Management recommendation	
Attachments	

Annex J: Board Resolution Template

Field / Checklist Item	Details / Status / Notes
Resolution number	
Meeting date	
Matter considered	
Resolution text	
Responsible person	
Implementation deadline	
Follow-up committee	
Chairperson signature	

Annex K: Policy Exception Request Template

Field / Checklist Item	Details / Status / Notes
Policy affected	
Requested exception	

Reason	
Risk assessment	
Duration of exception	
Compensating controls	
Approval authority	
Review date	

Annex L: Incident Escalation Matrix

Field / Checklist Item	Details / Status / Notes
Safeguarding incident	
Fraud or corruption suspicion	
Serious E&S incident	
Data breach	
Serious injury or fatality	
Donor non-compliance	
Media/reputational issue	
Legal/regulatory notice	

Annex M: Project Start-Up Checklist

Field / Checklist Item	Details / Status / Notes
Signed donor/partner agreement	
Approved workplan and budget	
Project code created	
Procurement plan prepared	
MEAL plan prepared	
Safeguards screening completed	
GESI considerations integrated	
Risk register opened	
Kick-off meeting held	
Reporting calendar created	

Annex N: Project Close-Out Checklist

Field / Checklist Item	Details / Status / Notes
Activities completed or transitioned	
Financial reconciliation completed	
Assets verified and disposition agreed	
Donor report submitted	
Safeguarding/E&S/complaints cases closed or transferred	
Evaluation or lessons report completed	
Records archived	
Partner close-out completed	

Annex O: Community Feedback Form Fields

Field / Checklist Item	Details / Status / Notes
Date	
Location	
Project	

Feedback/complaint category	
Details	
Complainant preference for confidentiality	
Immediate action taken	
Responsible person	
Resolution date	
Complainant satisfaction	

Annex P: Training Attendance Register Fields

Field / Checklist Item	Details / Status / Notes
Training title	
Date	
Location	
Facilitator	
Participant name	
Organisation/role	
Gender/age group where appropriate	
Signature	
Topics covered	
Follow-up action	

Annex Q: Data Protection Checklist

Field / Checklist Item	Details / Status / Notes
Purpose and lawful basis for data collection	
Consent or appropriate authorization	
Data minimisation	
Secure storage	
Access controls	
Retention period	
Data sharing approvals	
Incident reporting process	
Anonymisation for public reporting	