GRANT MANAGEMENT POLICY

FOR THE

INITIATIVE FOR LEGAL AID

(ILA)

GRANT MANAGEMENT POLICY

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DISTRIBUTION LIST

This Policy shall be distributed to:

1. Board of Directors;
2. Executive Director;
3. Senior Management Team;
4. Grants Management Function;
5. Programme Department;
6. Finance Department;
7. Procurement and Logistics Department;
8. MEAL Department;
9. Human Resource Department;
10. Legal and Compliance Function;
11. Project Managers;
12. All staff involved in grant-funded activities.

POLICY OWNERSHIP

The Executive Director shall be the overall policy owner and shall ensure that the Grant Management Policy is implemented effectively throughout ILA.

The Grants Management Function shall be responsible for the day-to-day coordination, monitoring, and application of this Policy in collaboration with relevant departments.

The Board of Directors shall provide governance oversight and ensure that grant management practices support institutional accountability, transparency, sustainability, and compliance with legal and donor obligations.

CHAPTER ONE

INTRODUCTION AND POLICY FRAMEWORK

1.1 Introduction

The Initiative for Legal Aid (ILA) recognizes that effective grant management is fundamental to achieving its mission of promoting access to justice, legal empowerment, human rights protection, and provision of quality legal aid services to vulnerable and marginalized communities.

As a non-profit organization dependent on institutional funding, donor contributions, partnerships, and project-based grants, ILA is committed to ensuring that all grants are managed with the highest standards of integrity, transparency, accountability, efficiency, and compliance.

Grant management involves the complete lifecycle of a grant, beginning from identification of funding opportunities, proposal development, grant negotiation, agreement signing, implementation, financial management, monitoring, reporting, audit, evaluation, and eventual closure.

This Policy establishes the principles, procedures, responsibilities, and controls that shall guide ILA in managing all grants received from donors, government institutions, development partners, foundations, private sector entities, and other funding partners.

1.2 Background of Initiative for Legal Aid (ILA)

The Initiative for Legal Aid (ILA) is a legal aid and human rights organization established to promote access to justice and provide legal support to individuals and communities who face barriers in accessing legal services.

ILA undertakes activities including legal representation, legal awareness, community legal education, research, advocacy, capacity building, and strengthening of justice systems.

To achieve its objectives, ILA collaborates with various stakeholders and relies on grants and partnerships to implement programmes that advance justice, equality, human rights, and social development.

The effective management of these resources is essential to maintaining donor confidence, protecting organizational reputation, and ensuring sustainable programme delivery.

1.3 Purpose of the Policy

The purpose of this Grant Management Policy is to establish a comprehensive framework for the effective acquisition, administration, implementation, monitoring, reporting, and closure of grants received by ILA.

The Policy aims to ensure that:

a. all grants are managed in accordance with approved agreements and donor requirements;

b. organizational resources are used responsibly and efficiently;

c. grant activities achieve intended objectives and results;

d. financial and programme accountability is maintained;

e. risks associated with grant implementation are identified and managed;

f. transparency and integrity are promoted throughout the grant lifecycle;

g. ILA maintains strong relationships with donors and partners.

1.4 Objectives of the Grant Management Policy

The objectives of this Policy are to:

a. establish clear procedures for managing grants from development partners and donors;

b. define institutional roles and responsibilities in grant management;

c. ensure compliance with donor agreements, applicable laws, and organizational policies;

d. strengthen financial accountability and internal controls;

e. promote effective planning, implementation, monitoring, and reporting;

f. establish mechanisms for identifying and managing grant-related risks;

g. ensure proper documentation and retention of grant records;

h. enhance organizational learning and sustainability from grant-funded interventions.

1.5 Scope and Application

This Policy applies to all grants, funding agreements, contracts, and financial support received by ILA from:

a. International donors;

b. United Nations agencies;

c. Government institutions;

d. Bilateral and multilateral development partners;

e. Foundations and philanthropic organizations;

f. Private sector partners;

g. Research and academic institutions;

h. Other funding entities.

The Policy applies to:

- Board members;
- management;
- employees;
- consultants;
- volunteers;
- project personnel;
- partners and sub-grantees involved in grant-funded activities.

All departments implementing or supporting grant-funded programmes shall comply with this Policy.

1.6 Policy Statement

ILA shall manage all grants in a manner that promotes accountability, transparency, effectiveness, and compliance.

The Organization shall:

a. Only accept grants that align with its mission, values, strategic objectives, and legal mandate;

b. Conduct appropriate due diligence before accepting funding;

c. Implement grants according to approved agreements and budgets;

d. Maintain adequate financial and operational controls;

e. Prevent fraud, corruption, conflicts of interest, and misuse of resources;

f. Provide accurate and timely reports to donors;

g. Maintain complete records for accountability and audit purposes;

h. Promote sustainability beyond the grant period.

No grant shall be accepted or implemented where the conditions attached compromise ILA’s independence, ethical standards, legal obligations, or institutional integrity.

1.7 Guiding Principles

ILA shall manage grants based on the following principles:

a) Accountability

ILA shall remain accountable to donors, beneficiaries, communities, regulators, and stakeholders for the responsible use of grant resources.

b) Transparency

All grant decisions, financial transactions, procurement processes, and reporting activities shall be conducted openly and documented appropriately.

c) Integrity

ILA shall maintain ethical standards and prevent fraud, corruption, conflicts of interest, and other misconduct.

d) Value for Money

Grant resources shall be utilized economically, efficiently, and effectively to maximize programme impact.

e) Compliance

All grants shall comply with donor requirements, applicable laws, contractual obligations, and ILA policies.

f) Results Orientation

Grant implementation shall focus on achieving measurable outcomes and sustainable impact.

g) Partnership

ILA shall maintain respectful, professional, and accountable relationships with donors, partners, and communities.

1.8 Grant Management Philosophy

ILA considers grant management not merely as an administrative requirement but as a strategic function that supports organizational growth, programme quality, and institutional sustainability.

Grant management shall therefore integrate:

- programme planning;
- financial management;
- procurement;
- human resources;
- risk management;
- monitoring and evaluation;
- accountability mechanisms;
- compliance systems;
- organizational learning.

1.9 Relationship with Other ILA Policies

This Policy shall be implemented together with other organizational policies, including:

1. Finance and Accounting Policy;
2. Procurement and Assets Management Policy;
3. Risk Management Policy;
4. Anti-Fraud, Corruption and Whistleblowing Policy;
5. Human Resource and Administration Policy;
6. MEAL Policy;
7. Data Protection and Privacy Policy;
8. ICT Policy;
9. Code of Conduct and Ethics Policy;
10. Partnership and Stakeholder Engagement Policy;
11. Board Governance Charter.

Where conflicts arise between this Policy and donor-specific requirements, ILA shall comply with the stricter applicable standard, provided it does not violate applicable law.

1.10 Legal and Regulatory Framework

Grant management activities shall comply with:

a. applicable laws and regulations of South Sudan;

b. NGO regulatory requirements;

c. tax obligations;

d. labour laws;

e. financial reporting requirements;

f. donor contractual obligations;

g. international standards applicable to humanitarian and development organizations.

1.11 Donor Compliance Requirements

ILA shall comply with donor requirements relating to:

- Approved budgets;
- Eligible expenditures;
- Procurement procedures;
- Reporting timelines;
- Visibility requirements;
- Safeguarding obligations;
- Financial audits;
- Monitoring visits;
- Evaluation requirements;
- Documentation standards.

Failure to comply with donor requirements may result in corrective actions, suspension of funding, repayment obligations, or reputational damage.

1.12 Definitions of Key Terms

Grant: Financial or material support provided by a donor or funding partner to enable ILA to implement approved activities.

Donor: An institution, organization, government, foundation, or individual providing financial or other support to ILA.

Grant Agreement: A legally binding document outlining the terms, conditions, responsibilities, and obligations of the donor and ILA.

Grant Lifecycle: The complete process from grant identification through closure.

Sub-grant: Funding transferred by ILA to another organization or partner for implementation of approved activities.

Grant Manager: A person responsible for coordinating and overseeing implementation of a specific grant.

Eligible Cost: A cost that is allowable under the grant agreement and applicable donor rules.

Grant Closure: The formal completion of all grant activities, financial obligations, reporting requirements, and documentation processes.

CHAPTER TWO

GRANT GOVERNANCE AND INSTITUTIONAL RESPONSIBILITIES

2.1 Introduction

Effective grant management requires a clearly defined governance structure that establishes accountability, authority, coordination mechanisms, and oversight responsibilities among different levels of the Organization.

ILA recognizes that successful implementation of grant-funded programmes requires cooperation between governance bodies, management, technical departments, financial units, and operational teams.

This Chapter establishes the roles and responsibilities of all actors involved in the grant management lifecycle to ensure proper planning, decision-making, compliance, accountability, and achievement of programme objectives.

2.2 Grant Governance Principles

ILA shall apply the following governance principles in managing grants:

a) Clear Accountability

Every grant shall have clearly assigned responsible persons and departments responsible for implementation, financial management, reporting, and compliance.

b) Separation of Duties

Grant management responsibilities shall be distributed among different individuals and departments to reduce risks of fraud, error, conflict of interest, and misuse of resources.

c) Oversight and Control

All grants shall be subject to appropriate oversight mechanisms, including management review, financial controls, monitoring, audits, and Board oversight.

d) Documentation and Evidence-Based Decision Making

All major grant-related decisions shall be documented and supported by appropriate records.

e) Compliance with Authority Levels

All grant decisions shall follow approved authorization limits and institutional approval procedures.

2.3 Role of the Board of Directors

The Board of Directors shall provide strategic oversight and governance supervision over grant management activities.

The Board shall:

a. Approve the Grant Management Policy and any subsequent amendments;

b. Provide oversight over major funding agreements and strategic partnerships;

c. Ensure that grants accepted by ILA align with the Organization's mission, values, and strategic objectives;

d. Review major grant risks and institutional sustainability issues;

e. Ensure adequate systems exist for financial accountability and donor compliance;

f. Review organizational performance related to grant-funded programmes;

g. Provide guidance on strategic resource mobilization;

h. Receive periodic reports on grant performance from Management;

i. Ensure that grant resources are protected from misuse, fraud, or mismanagement.

The Board shall not interfere with day-to-day grant implementation but shall maintain governance oversight.

2.4 Role of the Executive Director

The Executive Director shall be the chief executive responsible for ensuring effective implementation of this Policy.

The Executive Director shall:

a. Provide overall leadership for grant management;

b. Approve grant development and implementation processes within delegated authority;

c. Ensure that sufficient institutional capacity exists to manage grants effectively;

d. Approve grant proposals before submission where required;

e. Ensure compliance with grant agreements and donor requirements;

f. Assign responsibility for grant implementation;

g. Ensure coordination between programme, finance, procurement, and support departments;

h. Monitor overall grant performance;

i. Address significant grant risks and compliance issues;

j. Report major grant matters to the Board.

The Executive Director may delegate operational responsibilities but remains ultimately accountable for institutional grant management.

2.5 Role of Senior Management Team

The Senior Management Team shall provide operational leadership and coordination for grant management.

The Team shall:

a. Review potential funding opportunities;

b. Assess organizational capacity before accepting grants;

c. Ensure alignment between grants and strategic priorities;

d. Review grant implementation progress;

e. Resolve operational challenges affecting grant delivery;

f. Monitor compliance with donor obligations;

g. Support risk management and corrective actions;

h. Promote collaboration between departments.

The Senior Management Team shall meet regularly to review grant performance and emerging issues.

2.6 Grants Management Function

ILA shall establish a Grants Management Function responsible for coordinating grant administration and compliance.

The Grants Management Function shall:

a. Maintain the institutional grant portfolio;

b. Coordinate grant acquisition and proposal processes;

c. Maintain grant files and documentation;

d. Monitor compliance with grant agreements;

e. Coordinate donor reporting processes;

f. Track grant timelines and deliverables;

g. Maintain grant calendars;

h. Support programme and finance teams;

i. Monitor grant risks and compliance requirements;

j. Facilitate donor communication.

Where ILA does not have a dedicated Grants Unit, these responsibilities shall be assigned to a designated Grants Officer or equivalent position.

2.7 Role of Programme Department

The Programme Department shall be responsible for technical implementation of grant-funded activities.

The Department shall:

a. Develop programme concepts and technical proposals;

b. Prepare implementation plans and activity schedules;

c. Ensure activities are implemented according to approved objectives;

d. Maintain programme documentation;

e. Coordinate beneficiary engagement;

f. Monitor programme quality;

g. Identify implementation challenges;

h. Prepare technical inputs for donor reports;

i. Participate in monitoring and evaluation activities;

j. Ensure compliance with safeguarding and ethical requirements.

2.8 Role of Finance Department

The Finance Department shall ensure effective financial management and accountability of grant resources.

The Finance Department shall:

a. Review grant budgets before submission;

b. Establish financial systems for grant management;

c. Maintain accurate financial records;

d. Monitor grant expenditure against approved budgets;

e. Ensure compliance with donor financial rules;

f. Verify eligibility of expenditures;

g. Prepare financial reports;

h. Maintain supporting documentation;

i. Manage grant advances and liquidations;

j. Facilitate audits and financial reviews.

The Finance Department shall ensure that no grant expenditure is incurred without proper authorization and documentation.

2.9 Role of Procurement and Logistics Department

The Procurement and Logistics Department shall ensure that all grant-related procurement complies with:

- ILA Procurement and Assets Management Policy;
- donor procurement requirements;
- principles of transparency and competition.

Responsibilities include:

a. Preparing procurement plans;

b. Conducting procurement processes;

c. Maintaining procurement records;

d. Ensuring supplier due diligence;

e. Managing contracts and purchase orders;

f. Maintaining asset records;

g. Ensuring proper storage and utilization of grant-funded assets.

2.10 Role of MEAL Department

The Monitoring, Evaluation, Accountability and Learning (MEAL) Department shall ensure evidence-based grant implementation.

Responsibilities include:

a. Developing monitoring frameworks;

b. Tracking indicators and targets;

c. Collecting and verifying programme data;

d. Conducting field monitoring;

e. Supporting evaluations;

f. Ensuring beneficiary feedback mechanisms;

g. Documenting lessons learned;

h. Supporting adaptive programme management.

2.11 Role of Human Resource Department

The Human Resource Department shall support grant implementation through effective management of grant-funded personnel.

Responsibilities include:

a. Recruitment of grant-funded staff;

b. Maintaining employment records;

c. Ensuring compliance with labour requirements;

d. Managing staff contracts;

e. Supporting performance management;

f. Ensuring staff compliance with organizational policies;

g. Supporting staff transition after grant completion.

2.12 Role of Legal and Compliance Function

The Legal and Compliance Function shall provide legal guidance and compliance support.

Responsibilities include:

a. Reviewing grant agreements;

b. Advising on contractual obligations;

c. Reviewing partnership and sub-grant agreements;

d. Ensuring compliance with applicable laws;

e. Supporting dispute resolution;

f. Advising on donor legal requirements;

g. Supporting investigations where required.

2.13 Role of Internal Audit and Compliance Function

The Internal Audit and Compliance Function shall provide independent assurance on grant management systems.

Responsibilities include:

a. Reviewing compliance with policies;

b. Assessing internal controls;

c. Conducting grant compliance reviews;

d. Identifying weaknesses;

e. Recommending corrective actions;

f. Monitoring implementation of audit recommendations.

2.14 Role of Project Managers and Grant Coordinators

Project Managers and Grant Coordinators shall be responsible for day-to-day management of assigned grants.

They shall:

a. Coordinate project implementation;

b. Monitor progress against work plans;

c. Manage project teams;

d. Coordinate reporting;

e. Identify operational risks;

f. Maintain grant documentation;

g. Ensure activities remain within approved budgets;

h. Coordinate with Finance and MEAL teams;

i. Ensure compliance with grant conditions.

2.15 Grant Management Committee

Where necessary, ILA may establish a Grant Management Committee to provide coordination and oversight for significant grants.

The Committee may include representatives from:

- Management;
- Programmes;
- Finance;
- Procurement;
- MEAL;
- HR;
- Legal and Compliance.

The Committee shall:

a. Review grant implementation progress;

b. Monitor risks;

c. Review financial performance;

d. Coordinate reporting;

e. Address implementation challenges;

f. Support institutional learning.

2.16 Delegation of Authority

ILA shall maintain a clear delegation of authority framework for grant-related decisions.

Delegated authority shall specify:

a. Approval of proposals;

b. Acceptance of grants;

c. Budget approvals;

d. Expenditure authorization;

c. Procurement approvals;

d. Contract signing;

e. Reporting approval.

No employee shall approve transactions or decisions beyond their authorized limits.

2.17 Conflict of Interest Management

All persons involved in grant management shall disclose actual, potential, or perceived conflicts of interest.

ILA shall:

a. Maintain conflict of interest declarations;

b. Prevent individuals from participating in decisions where conflicts exist;

c. Investigate undisclosed conflicts;

d. Apply corrective measures where necessary.

Conflict of interest management shall be implemented in accordance with the ILA Code of Conduct and Ethics Policy.

2.18 Coordination and Communication

Effective grant management requires regular communication among all responsible departments.

ILA shall establish:

a. grant start-up meetings;

b. periodic implementation meetings;

c. financial review meetings;

d. reporting coordination meetings;

e. donor communication channels.

All significant grant decisions shall be properly documented.

CHAPTER THREE

RESOURCE MOBILIZATION AND GRANT DEVELOPMENT

3.1 Introduction

Resource mobilization is a critical institutional function that enables the Initiative for Legal Aid (ILA) to achieve its strategic objectives and sustain its programmes. As an organization committed to advancing access to justice, legal aid, human rights protection, and community empowerment, ILA shall actively pursue appropriate funding opportunities while maintaining independence, integrity, and accountability.

This Chapter establishes the procedures and controls governing identification of funding opportunities, donor engagement, grant development, proposal preparation, internal review, approval, and submission.

ILA shall ensure that all grant opportunities pursued are consistent with its mission, strategic priorities, institutional capacity, legal obligations, and ethical standards.

3.2 Resource Mobilization Framework

ILA shall maintain a structured resource mobilization framework to guide the identification and acquisition of financial and technical resources required for implementation of its programmes.

The resource mobilization framework shall include:

a. Identification of funding priorities;

b. Donor mapping and engagement;

c. Partnership development;

d. Grant opportunity monitoring;

e. Proposal development;

f. Relationship management;

g. Funding diversification;

h. Sustainability planning.

Resource mobilization shall be coordinated across the Organization to ensure that funding opportunities respond to identified community needs and institutional priorities.

3.3 Resource Mobilization Principles

ILA shall conduct resource mobilization activities based on the following principles:

a) Mission Alignment

ILA shall only pursue funding opportunities that support its mandate, values, strategic objectives, and programme priorities.

b) Independence and Integrity

ILA shall not accept funding that compromises its independence, ethical obligations, or ability to provide impartial legal aid services.

c) Transparency

All donor engagement and funding decisions shall be conducted openly and documented appropriately.

d) Sustainability

ILA shall prioritize funding opportunities that contribute to long-term institutional sustainability and programme impact.

e) Accountability

ILA shall remain accountable to donors, beneficiaries, communities, and stakeholders for all resources received.

3.4 Funding Strategy

ILA shall develop and periodically review a Resource Mobilization Strategy that identifies:

a. institutional funding priorities;

b. target donors and funding partners;

c. potential funding sources;

d. fundraising approaches;

e. partnership opportunities;

f. sustainability measures.

The Resource Mobilization Strategy shall be aligned with:

- ILA Strategic Plan;
- programme priorities;
- organizational capacity;
- available resources.

3.5 Donor Identification and Mapping

ILA shall maintain a donor mapping system to identify potential funding partners whose interests align with ILA's programmes.

Donor mapping shall consider:

a. Donor mandate and priorities;

b. Geographical focus;

c. Thematic areas;

d. Funding mechanisms;

e. Eligibility requirements;

f. Previous funding history;

g. Compliance requirements.

Potential donors may include:

- International development agencies;
- United Nations agencies;
- Government institutions;
- Foundations;
- Academic institutions;
- Private sector partners;
- Legal and justice sector organizations.

3.6 Grant Opportunity Identification

ILA shall establish mechanisms for identifying suitable grant opportunities.

Sources of information may include:

a. Donor websites and announcements;

b. Partner networks;

c. Professional networks;

d. Government programmes;

e. Civil society platforms;

f. Development coordination forums.

All identified opportunities shall undergo an initial assessment before resources are committed to proposal development.

3.7 Grant Opportunity Assessment

Before pursuing any grant opportunity, ILA shall conduct an assessment to determine suitability.

The assessment shall consider:

a. Alignment with ILA's mission and strategic priorities;

b. Eligibility requirements;

c. Donor expectations;

d. Available organizational capacity;

e. Implementation timeframe;

f. Financial requirements;

g. Risks and compliance obligations;

h. Sustainability potential.

A Grant Opportunity Assessment Form shall be completed for significant funding opportunities.

3.8 Donor Due Diligence Before Engagement

Before entering into significant funding relationships, ILA shall conduct appropriate due diligence on potential donors and partners.

Due diligence may include assessment of:

a. Donor legitimacy;

b. Reputation and credibility;

c. Funding conditions;

d. Ethical considerations;

e. Legal implications;

f. Potential conflicts of interest.

ILA shall avoid accepting resources from sources that may expose the Organization to legal, ethical, reputational, or operational risks.

3.9 Concept Note Development

Where required by donors, ILA shall prepare concept notes as an initial step in grant development.

Concept notes shall include:

a. Background and justification;

b. Problem analysis;

c. Proposed intervention;

d. Objectives;

e. Expected results;

f. Target beneficiaries;

g. Implementation approach;

h. Estimated budget;

i. Sustainability considerations.

Concept notes shall undergo internal review before submission.

3.10 Proposal Development Process

Grant proposals shall be developed through a coordinated and participatory process involving relevant departments.

The proposal development team may include:

- Programme Department;
- Finance Department;
- MEAL Department;
- Legal and Compliance Function;
- Procurement Department;
- Senior Management.

Proposal development shall include:

a. Situation analysis;

b. Problem identification;

c. Programme design;

d. Results framework;

e. Implementation methodology;

f. Risk assessment;

g. Monitoring framework;

h. Sustainability plan;

i. Detailed budget.

3.11 Technical Proposal Preparation

Technical proposals shall clearly demonstrate:

a. Understanding of the problem;

b. Relevance of the proposed intervention;

c. Organizational capacity;

d. Implementation methodology;

e. Expected outcomes;

f. Monitoring approach;

g. Risk management measures.

ILA shall ensure that proposals are evidence-based and demonstrate realistic, measurable, and achievable results.

3.12 Budget Development

Grant budgets shall be prepared jointly by Programme and Finance Departments.

Budgets shall:

a. Reflect realistic implementation costs;

b. Align with proposed activities;

c. Comply with donor requirements;

d. Include appropriate cost assumptions;

e. Clearly identify direct and indirect costs;

f. Consider financial sustainability.

Budget preparation shall comply with the ILA Finance and Accounting Policy.

3.13 Grant Risk Assessment During Development

Before submission of a proposal, ILA shall conduct a risk assessment covering:

a. Financial risks;

b. Operational risks;

c. Security risks;

d. Compliance risks;

e. Safeguarding risks;

f. Partnership risks;

g. Sustainability risks.

Risk mitigation measures shall be incorporated into proposal design.

3.14 Internal Proposal Review and Approval

All grant proposals shall undergo internal review before submission.

The review process shall confirm:

a. Alignment with organizational priorities;

b. Technical quality;

c. Financial accuracy;

d. Operational feasibility;

e. Legal compliance;

f. Risk management measures.

Approval authority shall depend on the size, nature, and strategic importance of the grant.

3.15 Proposal Submission Procedures

Only authorized representatives of ILA shall submit grant applications on behalf of the Organization.

Before submission, the responsible department shall verify that:

a. All required documents are complete;

b. Approvals have been obtained;

c. Budgets are accurate;

d. Submission deadlines are met;

e. Donor requirements are satisfied.

A Copy of every submitted proposal shall be retained in ILA grant records.

3.16 Record Keeping During Grant Development

ILA shall maintain proper records of all grant development activities, including:

- Donor communications;
- Concept notes;
- Proposals;
- Budgets;
- Approval records;
- Due diligence documents;
- Correspondence;
- Submission confirmations.

Grant development records shall be maintained in accordance with the ILA Records Management requirements and Data Protection Policy.

3.17 Unsuccessful Grant Applications

Where a grant application is unsuccessful, ILA shall:

a. Record the outcome;

b. Review donor feedback where available;

c. Document lessons learned;

d. Consider opportunities for future improvement.

Unsuccessful applications may contribute to future programme development and fundraising efforts.

3.18 Ethical Fundraising Practices

ILA shall ensure that all fundraising activities:

a. Respect organizational values;

b. Avoid misleading representations;

c. Protect beneficiary dignity;

d. Comply with applicable laws;

e. Maintain donor confidence;

f. Promote responsible partnerships.

CHAPTER FOUR

GRANT DUE DILIGENCE AND AWARD MANAGEMENT

4.1 Introduction

Grant due diligence and award management are essential processes that ensure that ILA enters into responsible, legally sound, and sustainable funding relationships.

Before accepting any grant, ILA shall undertake appropriate assessments to determine the suitability of the donor, the obligations attached to the funding, organizational capacity requirements, compliance implications, and potential risks.

Once a grant is awarded, ILA shall establish proper systems to ensure that the grant agreement is understood, documented, approved, implemented, and monitored in accordance with agreed terms and conditions.

This Chapter establishes procedures governing grant review, acceptance, negotiation, approval, agreement management, and start-up processes.

4.2 Grant Award Principles

ILA shall manage grant awards based on the following principles:

a) Strategic Alignment

ILA shall only accept grants that support its mission, strategic objectives, and approved programme priorities.

b) Legal Compliance

All grant agreements shall comply with applicable laws, regulations, and organizational policies.

c) Institutional Capacity

ILA shall only accept grants where it has, or can reasonably develop, sufficient technical, financial, operational, and human capacity.

d) Risk Awareness

ILA shall identify and assess risks associated with each grant before acceptance.

e) Accountability

ILA shall ensure that obligations accepted under grant agreements can be fulfilled effectively and responsibly.

4.3 Grant Award Notification

Upon receiving notification of a successful grant application, the Grants Management Function shall formally communicate the award to relevant departments.

The notification shall include:

a. Donor name;

b. Grant title;

c. Grant amount;

d. Project duration;

e. Implementation location;

f. Key deliverables;

g. Reporting requirements;

h. Donor conditions;

i. Responsible project team.

A grant award file shall be opened immediately upon notification of award.

4.4 Grant Due Diligence Process

Before accepting a grant, ILA shall conduct due diligence to confirm:

a. Donor legitimacy;

b. Funding source credibility;

c. Legal requirements;

d. Financial obligations;

e. Compliance expectations;

f. Reporting requirements;

g. Reputational considerations;

h. Risks associated with acceptance.

The level of due diligence shall be proportionate to the size, complexity, and risk level of the grant.

4.5 Donor Due Diligence

ILA shall assess donors and funding partners based on relevant criteria, including:

a. Institutional identity and registration;

b. Reputation and public standing;

c. Previous engagement with civil society organizations;

d. Funding conditions;

e. Ethical considerations;

f. Political or reputational risks;

g. Compliance expectations.

ILA shall not knowingly accept funding from sources that may:

- Undermine the Organization's independence;
- Compromise neutrality;
- Create legal exposure;
- Conflict with ILA's values.

4.6 Grant Agreement Review

Before signing any grant agreement, the document shall undergo institutional review.

The review shall involve:

a. Executive Director;

b. Finance Department;

c. Programme Department;

d. Legal and Compliance Function;

e. Procurement Department where applicable.

The review shall confirm:

- Grant objectives;
- Implementation obligations;
- Financial conditions;
- Reporting requirements;
- Procurement rules;
- Audit requirements;
- Termination clauses;
- Intellectual property requirements;
- Confidentiality obligations;
- Safeguarding requirements.

4.7 Legal Review of Grant Agreements

The Legal and Compliance Function shall review grant agreements to identify legal obligations and potential risks.

The legal review shall consider:

a. Contractual obligations;

b. Applicable governing law;

c. Dispute resolution mechanisms;

d. Liability provisions;

e. Termination conditions;

f. Confidentiality provisions;

g. Data protection requirements;

h. Partnership obligations.

No grant agreement shall be signed where significant legal risks remain unresolved.

4.8 Financial Review of Grant Agreements

The Finance Department shall review grant agreements to confirm:

a. Approved budget;

b. Payment schedule;

c. Eligible expenditure rules;

d. Financial reporting obligations;

e. Audit requirements;

f. Currency provisions;

g. Cost-sharing requirements;

h. Indirect cost provisions;

i. Financial controls required.

Finance shall ensure that grant conditions can be managed within existing financial systems.

4.9 Programme Review of Grant Agreements

The Programme Department shall review grant agreements to confirm:

a. Technical feasibility;

b. Expected outcomes;

c. Implementation timeframe;

d. Beneficiary requirements;

e. Monitoring obligations;

f. Reporting expectations;

g. Resource requirements.

4.10 Grant Negotiation Process

Where necessary, ILA may negotiate grant terms before final acceptance.

Negotiations may address:

a. Budget adjustments;

b. Implementation timelines;

c. Reporting requirements;

d. Activity modifications;

e. Staffing arrangements;

f. Procurement requirements;

g. Compliance conditions.

All negotiations shall be conducted by authorized representatives of ILA.

4.11 Grant Acceptance and Approval Authority

A grant shall only be accepted after completion of:

a. Due diligence;

b. Technical review;

c. Financial review;

d. Legal review;

e. Risk assessment;

f. Internal approval procedures.

Approval authority shall depend on:

- Grant value;
- Strategic importance;
- Legal implications;
- Institutional risk.

The Board of Directors shall provide oversight for major strategic grants or grants requiring significant institutional commitments.

4.12 Signing of Grant Agreements

Grant agreements shall only be signed by authorized representatives in accordance with ILA's delegation of authority framework.

Before signing:

a. Final agreement terms shall be verified;

b. Required approvals shall be documented;

c. Responsibilities shall be assigned;

d. Implementation arrangements shall be prepared.

A fully signed copy shall be maintained in the official grant file.

4.13 Grant Registration and Documentation

Upon signing of a grant agreement, the Grants Management Function shall register the grant in the institutional grant database.

The grant record shall include:

a. Donor information;

b. Grant title;

c. Grant value;

d. Duration;

e. Project location;

f. Project manager;

g. Reporting deadlines;

h. Financial requirements;

i. Compliance obligations.

4.14 Grant Start-Up Procedures

Following grant approval, ILA shall conduct a formal grant start-up process.

The start-up process shall include:

a) Grant Inception Meeting

A meeting involving relevant departments to review:

- Grant objectives;
- Implementation plans;
- Roles and responsibilities;
- Compliance requirements.

b) Work Plan Development

A detailed implementation plan shall be prepared, including:

- Activities;
- Timelines;
- Responsible persons;
- Indicators;
- Resource requirements.

c) Budget Review

The Finance Department shall establish budget monitoring systems.

d) Compliance Orientation

Relevant staff shall be informed about:

- Donor conditions;
- Procurement requirements;
- Reporting obligations;
- Safeguarding requirements;
- Documentation standards.

4.15 Grant Start-Up Checklist

Each grant shall have a start-up checklist covering:

Requirement	Responsible Unit
Signed agreement	Grants/Legal
Approved budget	Finance
Work plan	Programme
Monitoring framework	MEAL
Procurement plan	Procurement
Staffing plan	HR
Risk assessment	Management
Grant file creation	Grants

4.16 Grant File Establishment

A grant file shall be created for every approved grant.

The file shall contain:

a. Grant agreement;

b. Approved proposal;

c. Approved budget;

d. Implementation plan;

e. Risk assessment;

f. Donor correspondence;

g. Financial reports;

h. Programme reports;

i. Audit reports;

j. Monitoring records;

k. Amendments;

l. Closure documents.

Grant files may be maintained electronically and physically in accordance with ILA document management procedures.

4.17 Grant Amendments and Modifications

Any changes to grant agreements shall be formally reviewed and approved.

Grant amendments may include:

a. Budget revisions;

b. Extension of timelines;

c. Changes in activities;

d. Changes in implementation arrangements;

e. Changes in reporting requirements.

No material change shall be implemented without written approval from the donor where required.

4.18 Grant Suspension and Termination

ILA shall manage grant suspension or termination in accordance with agreement provisions.

Potential causes may include:

a. Donor decision;

b. Breach of agreement;

c. Serious compliance issues;

d. Financial irregularities;

e. Inability to implement activities.

Where termination occurs, ILA shall ensure:

- Proper financial reconciliation;
- Completion of required reports;
- Return of unspent funds where applicable;
- Proper closure of records.

CHAPTER FIVE

GRANT IMPLEMENTATION MANAGEMENT

5.1 Introduction

Grant implementation is the stage where approved grant resources are translated into planned activities, outputs, outcomes, and intended impact. Effective implementation requires coordinated planning, efficient resource utilization, compliance with grant agreements, continuous monitoring, and timely corrective action.

The Initiative for Legal Aid (ILA) shall ensure that every grant is implemented in accordance with approved proposals, budgets, work plans, donor requirements, organizational policies, and applicable legal obligations.

This Chapter establishes the procedures and standards governing implementation planning, coordination, activity delivery, performance management, change management, and quality assurance.

5.2 Grant Implementation Principles

ILA shall implement grants based on the following principles:

a) Compliance with Approved Agreements

All grant activities shall be implemented according to the signed grant agreement, approved proposal, approved budget, and agreed implementation plans.

b) Results-Based Management

Grant implementation shall focus on achieving measurable results, outcomes, and sustainable impact.

c) Efficient Use of Resources

Grant resources shall be used economically and responsibly to achieve maximum programme value.

d) Participation and Inclusion

Implementation shall promote meaningful participation of beneficiaries, communities, partners, and relevant stakeholders.

e) Continuous Improvement

ILA shall use monitoring, feedback, and learning processes to improve implementation quality.

5.3 Grant Implementation Planning

Before commencement of activities, ILA shall prepare a detailed implementation plan.

The implementation plan shall include:

a. Project objectives;

b. Activities and deliverables;

c. Implementation timelines;

d. Responsible persons;

e. Required resources;

f. Indicators and targets;

g. Procurement requirements;

h. Staffing requirements;

i. Risk mitigation measures.

The implementation plan shall guide programme execution and performance monitoring.

5.4 Grant Inception Meetings

For each major grant, ILA shall conduct a grant inception meeting involving relevant departments and stakeholders.

The purpose of the meeting shall be to:

a. Review grant objectives;

b. Clarify roles and responsibilities;

c. Review donor requirements;

d. Confirm reporting arrangements;

e. Identify implementation risks;

f. Agree on coordination mechanisms.

Minutes of the inception meeting shall be documented and maintained in the grant file.

5.5 Project Work Plans

Each grant shall have an approved work plan developed by the responsible Programme Team.

The work plan shall specify:

- Activities;
- Expected outputs;
- Implementation schedule;
- Responsible staff;
- Required inputs;
- Monitoring indicators.

Work plans shall be reviewed periodically and updated where necessary, subject to donor approval where required.

5.6 Activity Implementation

ILA shall implement grant activities in accordance with approved plans and agreed standards.

Programme teams shall ensure that:

a. Activities are delivered on time;

b. Beneficiaries are appropriately identified and engaged;

c. Resources are available before implementation;

d. Activities comply with safeguarding principles;

e. Documentation is maintained;

f. Implementation challenges are reported promptly.

5.7 Grant Coordination and Management Meetings

ILA shall establish regular coordination meetings for significant grants.

Meetings may involve:

- Project Managers;
- Programme Teams;
- Finance Department;
- MEAL Department;
- Procurement Department;
- Management representatives.

Meetings shall review:

a. Implementation progress;

b. Budget performance;

c. Procurement status;

d. Risks and challenges;

e. Reporting deadlines;

f. Corrective actions.

5.8 Budget Implementation Management

Grant expenditures shall be guided by the approved grant budget.

ILA shall ensure that:

a. Expenditure relates directly to approved activities;

b. Costs are reasonable and necessary;

c. Expenditures are properly authorized;

d. Supporting documentation is maintained;

e. Budget variances are monitored.

The Finance Department shall provide regular budget performance reports to project managers and management.

5.9 Grant Budget Monitoring

Grant budgets shall be monitored throughout implementation.

Budget monitoring shall include:

a. Comparison of actual expenditure against approved budgets;

b. Identification of under-spending or over-spending;

c. Review of financial commitments;

d. Forecasting of future expenditure;

e. Corrective action where necessary.

Significant budget deviations shall be investigated and managed in accordance with donor requirements.

5.10 Programme Quality Assurance

ILA shall establish quality assurance mechanisms to ensure that grant-funded activities meet expected standards.

Quality assurance shall include:

a. Technical reviews;

b. Field monitoring;

c. Beneficiary feedback;

d. Supervision visits;

e. Documentation reviews;

f. Outcome assessments.

The Programme and MEAL Departments shall work together to ensure programme quality.

5.11 Grant Performance Monitoring

Grant performance shall be monitored against:

a. Approved objectives;

b. Indicators;

c. Targets;

d. Implementation schedules;

e. Budget performance;

f. Donor commitments.

Performance monitoring shall identify:

- Achievements;
- Delays;
- Implementation barriers;
- Emerging risks;
- Improvement opportunities.

5.12 Managing Implementation Challenges

Where implementation challenges arise, responsible teams shall:

a. Identify the cause of the challenge;

b. Assess the impact on grant objectives;

c. Develop corrective measures;

d. Document decisions taken;

e. Communicate significant issues to management and donors where necessary.

ILA shall take timely action to prevent minor issues from affecting overall grant performance.

5.13 Grant Changes and Variations

Changes to grant implementation may occur due to:

- Operational realities;
- Security situations;
- Changes in beneficiary needs;
- Regulatory changes;
- Resource constraints.

All proposed changes shall be assessed to determine:

a. Impact on objectives;

b. Impact on budget;

c. Impact on timelines;

d. Donor approval requirements.

5.14 Grant Amendment Procedures

Material changes to grants shall follow formal amendment procedures.

An amendment request shall include:

a. Justification for change;

b. Proposed modifications;

c. Impact assessment;

d. Revised budget where applicable;

e. Revised implementation plan.

No material amendment shall be implemented without appropriate approval.

5.15 Procurement Planning During Implementation

All grant-related procurement shall be planned and conducted according to:

- Approved budgets;
- Procurement plans;
- ILA Procurement and Assets Management Policy;
- Donor procurement requirements.

Procurement planning shall identify:

a. Goods required;

b. Services required;

c. Procurement timelines;

d. Responsible persons;

e. Applicable procurement methods.

5.16 Human Resource Deployment During Implementation

ILA shall ensure that grant-funded personnel are appropriately recruited, supervised, and managed.

Grant implementation shall include:

a. Approved staffing structures;

b. Clear job descriptions;

c. Appropriate recruitment procedures;

d. Performance management;

e. Compliance with labour requirements.

Staff costs charged to grants shall be supported by appropriate documentation.

5.17 Partner and Stakeholder Coordination

Where implementation involves partners or stakeholders, ILA shall establish appropriate coordination mechanisms.

These may include:

a. Partnership agreements;

b. Joint planning meetings;

c. Progress reviews;

d. Information sharing mechanisms;

e. Monitoring arrangements.

All partnerships shall comply with the ILA Partnership and Stakeholder Engagement Policy.

5.18 Grant Risk Management During Implementation

Grant risks shall be continuously monitored throughout implementation.

Risks may include:

- Financial risks;
- Operational risks;
- Security risks;
- Compliance risks;
- Safeguarding risks;
- Reputational risks.

Responsible managers shall ensure that mitigation measures are implemented.

5.19 Grant Documentation During Implementation

ILA shall maintain adequate documentation throughout the grant period.

Documentation shall include:

a. Activity reports;

b. Attendance records;

c. Procurement documents;

d. Payment records;

e. Photographs and evidence where appropriate;

f. Monitoring reports;

g. Correspondence;

h. Meeting minutes.

All documentation shall be maintained according to ILA record management requirements.

5.20 Grant Implementation Reporting

Project Managers shall provide regular internal implementation updates.

Reports shall cover:

a. Activities completed;

b. Progress against targets;

c. Challenges encountered;

d. Expenditure status;

e. Risks identified;

f. Planned next steps.

Internal reporting shall support management decision-making and donor reporting.

5.21 Grant Implementation Closure Preparation

As grants approach completion, ILA shall begin closure preparation to ensure:

a. Outstanding activities are completed;

b. Financial obligations are resolved;

c. Assets are properly managed;

d. Final reports are prepared;

e. Lessons learned are documented.

CHAPTER SIX

GRANT FINANCIAL MANAGEMENT AND CONTROL

6.1 Introduction

Effective financial management is a fundamental requirement for successful grant implementation. The Initiative for Legal Aid (ILA) recognizes that donor resources are entrusted to the Organization for specific purposes and must be managed with the highest standards of accountability, transparency, efficiency, and compliance.

This Chapter establishes the financial management principles, procedures, and controls applicable to all grants received by ILA.

Grant financial management shall be implemented in accordance with:

- The approved grant agreement;
- Donor financial requirements;
- ILA Finance and Accounting Policy;
- Applicable laws and regulations;
- Accepted accounting standards;
- Internal control procedures.

The Finance Department shall maintain the primary responsibility for financial oversight, while all departments involved in grant implementation shall be accountable for responsible use of grant resources.

6.2 Grant Financial Management Principles

ILA shall manage grant finances according to the following principles:

a) Accountability

All grant funds shall be used only for approved purposes and shall be supported by adequate documentation.

b) Transparency

Financial transactions shall be properly recorded, reported, and made available for review and audit.

c) Compliance

Grant expenditures shall comply with donor requirements, approved budgets, contractual obligations, and organizational policies.

d) Value for Money

ILA shall ensure that grant resources provide maximum benefit through efficient and economical utilization.

e) Segregation of Duties

Financial responsibilities shall be separated among authorization, processing, recording, and review functions.

f) Sustainability

Financial decisions shall consider long-term organizational sustainability and responsible resource management.

6.3 Grant Budget Management

Every grant shall have an approved budget that serves as the primary financial control document.

The grant budget shall:

a. Reflect approved programme activities;

b. Identify expected costs and resources;

c. Establish spending limits;

d. Guide financial planning and monitoring;

e. Support donor reporting requirements.

No expenditure shall be incurred outside the approved budget unless authorized through appropriate procedures.

6.4 Budget Review Before Implementation

Before grant implementation begins, the Finance Department shall review the approved budget to confirm:

a. Accuracy of budget calculations;

b. Compliance with donor requirements;

c. Availability of funding;

d. Cost eligibility;

e. Budget classification;

f. Financial reporting requirements.

The Finance Department shall establish budget codes and financial tracking systems before expenditure begins.

6.5 Budget Monitoring and Control

ILA shall continuously monitor grant budgets throughout implementation.

Budget monitoring shall include:

a. Comparison between actual expenditure and approved budget;

b. Analysis of budget variances;

c. Review of commitments and obligations;

d. Expenditure forecasting;

e. Identification of financial risks.

Budget monitoring reports shall be shared with relevant project managers and management.

6.6 Budget Variance Management

Where significant differences occur between planned and actual expenditure, ILA shall investigate the causes and take corrective action.

Budget variances may arise from:

a. Changes in activity implementation;

b. Cost increases;

c. Delays in implementation;

d. Operational challenges;

e. Exchange rate fluctuations.

Where donor approval is required, ILA shall seek written authorization before reallocating funds.

6.7 Eligible Grant Expenditure

Grant funds shall only be used for eligible costs that are:

a. Necessary for implementation of approved activities;

b. Reasonable and justified;

c. Included in the approved budget or properly authorized;

d. Incurred within the grant period;

e. Supported by adequate documentation.

Examples of eligible costs may include:

- Approved personnel costs;
- Programme activities;
- Approved procurement;
- Operational expenses;
- Monitoring activities;
- Approved administrative costs.

6.8 Ineligible Grant Expenditure

Grant funds shall not be used for costs that are:

a. Unrelated to approved activities;

b. Unsupported by documentation;

c. Incurred outside the grant period without approval;

d. Prohibited by donor rules;

e. Resulting from fraud or misconduct.

Examples may include:

- Unauthorized personal expenses;
- Undocumented payments;
- Unauthorized gifts;
- Penalties and fines not permitted by donors;
- Expenditure arising from negligence or misconduct.

6.9 Cost Allocation and Apportionment

Where expenses benefit more than one project or organizational function, ILA shall apply fair and reasonable cost allocation methods.

Cost allocation shall be based on:

a. Actual usage;

b. Staff time allocation;

c. Approved allocation methods;

d. Donor requirements.

Allocation methods shall be documented and consistently applied.

6.10 Financial Authorization Controls

All grant expenditures shall follow approved authorization procedures.

Authorization shall include:

a. Verification of budget availability;

b. Approval by authorized persons;

c. Confirmation of supporting documents;

d. Compliance review where necessary.

No person shall authorize their own payment, procurement, or financial transaction.

6.11 Grant Bank Account Management

Where required by donors or considered appropriate by ILA, separate bank accounts or accounting codes may be established for grant funds.

Grant bank account management shall include:

a. Authorized signatories;

b. Regular reconciliation;

c. Controlled access;

d. Accurate transaction recording;

e. Compliance with banking requirements.

6.12 Cash Management

ILA shall maintain effective cash management systems to ensure availability of funds while minimizing risks.

Cash management shall include:

a. Cash flow forecasting;

b. Timely donor fund requests;

c. Monitoring of available balances;

d. Proper management of advances;

e. Prevention of idle funds.

6.13 Grant Advances and Liquidation

Advances provided for grant activities shall be properly controlled.

Before issuing advances:

a. Approval shall be obtained;

b. Purpose shall be clearly identified;

c. Amount shall be reasonable;

d. Previous advances shall be accounted for where applicable.

Recipients of advances shall submit liquidation documents within the required timeframe.

6.14 Supporting Documentation Requirements

All grant expenditures shall be supported by appropriate documentation.

Supporting documents may include:

- Invoices;
- Receipts;
- Contracts;

- Purchase orders;
- Payment vouchers;
- Attendance records;
- Timesheets;
- Delivery notes;
- Approval documents.

Documents shall clearly demonstrate:

a. Purpose of expenditure;

b. Authorization;

c. Amount paid;

d. Date of transaction;

e. Relationship to grant activities.

6.15 Financial Record Keeping

ILA shall maintain complete and accurate grant financial records.

Records shall include:

a. Accounting entries;

b. Payment documentation;

c. Budgets;

d. Financial reports;

e. Bank records;

f. Reconciliations;

g. Audit documents.

Financial records shall be maintained securely throughout the required retention period.

6.16 Grant Financial Reporting

ILA shall prepare financial reports according to:

- Donor requirements;

- Grant agreements;
- Reporting schedules.

Financial reports shall:

a. Accurately reflect expenditure;

b. Correspond with accounting records;

c. Explain significant variances;

d. Include required supporting information.

Reports shall be reviewed and approved before submission.

6.17 Donor Financial Reporting

Before submission to donors, financial reports shall undergo internal review.

The review shall confirm:

a. Accuracy;

b. Completeness;

b. Consistency with approved budgets;

c. Compliance with donor requirements;

d. Availability of supporting documentation.

Late or inaccurate financial reporting shall be treated as a compliance issue requiring corrective action.

6.18 Currency Management

Where grants involve foreign currency, ILA shall establish appropriate procedures for:

a. Exchange rate application;

b. Recording foreign currency transactions;

c. Reporting currency conversion;

d. Managing exchange rate risks.

The applicable exchange rate method shall be documented and consistently applied.

6.19 Procurement Expenditure Controls

All grant-funded procurement shall comply with:

- Approved budgets;
- Procurement plans;
- Procurement thresholds;
- Donor requirements;
- ILA Procurement and Assets Management Policy.

Finance shall verify procurement documentation before payment.

6.20 Payroll and Personnel Costs

Personnel costs charged to grants shall be properly controlled.

Requirements shall include:

a. Approved staffing structure;

b. Employment contracts;

c. Payroll records;

d. Timesheets where required;

e. Allocation records for shared staff costs.

ILA shall ensure that salary charges are reasonable, documented, and consistent with approved budgets.

6.21 Grant Financial Reviews

The Finance Department shall conduct periodic financial reviews to assess:

a. Expenditure performance;

b. Compliance with budgets;

c. Documentation quality;

d. Financial risks;

e. Corrective actions required.

Financial reviews shall support effective decision-making and accountability.

6.22 Fraud Prevention and Financial Misconduct

ILA shall maintain strong controls to prevent:

- Fraud;
- Corruption;
- Theft;
- Financial misrepresentation;
- Misuse of donor resources.

Suspected financial misconduct shall be reported and handled in accordance with the ILA Anti-Fraud, Corruption and Whistleblowing Policy.

6.23 Financial Audit Requirements

Grant finances shall be subject to:

a. Internal reviews;

b. External audits;

c. Donor audits;

d. Regulatory inspections where applicable.

ILA shall cooperate fully with audit processes and implement recommendations.

6.24 Financial Closure of Grants

At grant completion, Finance shall ensure:

a. All expenditures are recorded;

b. Outstanding advances are cleared;

c. Final reconciliations are completed;

d. Final financial reports are prepared;

e. Financial records are archived.

CHAPTER SEVEN

PROCUREMENT AND ASSET MANAGEMENT UNDER GRANTS

7.1 Introduction

Procurement and asset management are critical components of effective grant implementation. The Initiative for Legal Aid (ILA) recognizes that grant resources must be acquired, managed, safeguarded, and utilized in a manner that promotes transparency, efficiency, accountability, and value for money.

All procurement and asset management activities financed through grants shall comply with:

- The approved grant agreement;
- Donor procurement requirements;
- ILA Procurement and Assets Management Policy;
- Applicable laws and regulations;
- Principles of fairness, competition, and integrity.

This Chapter establishes the framework governing procurement planning, purchasing processes, supplier management, asset acquisition, utilization, safeguarding, verification, and disposal under grant-funded activities.

7.2 Procurement Principles for Grant Management

ILA shall undertake grant-funded procurement based on the following principles:

a) Transparency

All procurement decisions shall be properly documented and conducted openly.

b) Fair Competition

Qualified suppliers shall have equal opportunity to participate in procurement processes.

c) Value for Money

Procurement decisions shall consider quality, cost, suitability, and sustainability.

d) Accountability

All procurement decisions shall have clear justification, authorization, and documentation.

e) Integrity

Procurement shall be conducted free from fraud, corruption, favoritism, and conflicts of interest.

f) Compliance

Procurement shall comply with donor requirements and applicable organizational policies.

7.3 Procurement Planning

Every grant shall have a procurement plan developed during the start-up phase.

The procurement plan shall identify:

a. Goods required;

b. Services required;

c. Estimated costs;

d. Procurement timelines;

e. Procurement methods;

f. Responsible persons;

g. Approval requirements.

The procurement plan shall be reviewed periodically and updated where implementation circumstances change.

7.4 Link Between Grant Budget and Procurement Plan

Procurement activities shall directly correspond with approved grant budgets.

Before initiating procurement, responsible departments shall confirm:

a. Availability of approved funds;

b. Budget line allocation;

c. Donor eligibility;

d. Procurement requirements.

No procurement shall be undertaken where funding has not been approved or where the expenditure is inconsistent with grant objectives.

7.5 Donor Procurement Requirements

Where donor procurement rules differ from ILA procedures, the applicable donor requirements shall be followed provided they comply with applicable law.

The Procurement Department shall review donor requirements relating to:

a. Procurement thresholds;

b. Tender procedures;

c. Supplier eligibility;

d. Documentation standards;

e. Approval requirements;

f. Procurement reporting obligations.

7.6 Procurement Methods

ILA shall use procurement methods appropriate to the value, nature, and risk of the purchase.

Procurement methods may include:

a) Direct Procurement

Used only where justified and permitted under applicable procedures.

b) Request for Quotations

Used for lower-value purchases requiring comparison of supplier quotations.

c) Competitive Tendering

Used for higher-value procurement requiring open competition.

d) Framework Agreements

Used where recurring purchases are expected.

e) Other Approved Methods

Where required by donor rules or special circumstances.

7.7 Procurement Thresholds and Approvals

ILA shall establish procurement thresholds specifying:

a. Procurement method;

b. Approval authority;

c. Documentation requirements.

Procurement thresholds shall be reviewed periodically and communicated to relevant staff.

No employee shall divide procurement into smaller transactions to avoid approval requirements or competitive procedures.

7.8 Procurement Committee

For significant grant-funded procurement, ILA may establish a Procurement Committee.

The Committee may include representatives from:

- Procurement Department;
- Finance Department;
- Programme Department;
- Management;
- Technical experts where necessary.

The Procurement Committee shall:

a. Review procurement documents;

b. Evaluate bids;

c. Ensure fairness and transparency;

d. Recommend supplier selection;

e. Document procurement decisions.

7.9 Supplier Selection and Due Diligence

Before engaging suppliers, ILA shall conduct appropriate supplier verification.

Supplier assessment may include:

a. Legal registration;

b. Tax compliance;

c. Ownership information;

d. Technical capacity;

e. Financial capacity;

f. Previous performance;

g. Conflict of interest checks.

ILA shall avoid engaging suppliers associated with fraud, corruption, sanctions, or unethical conduct.

7.10 Conflict of Interest in Procurement

All persons involved in procurement shall disclose any actual, potential, or perceived conflict of interest.

Individuals shall not participate in procurement decisions where they:

a. Have financial interests in a supplier;

b. Have personal relationships affecting impartiality;

c. May benefit directly or indirectly from the transaction.

Violations shall be handled in accordance with the ILA Code of Conduct and Anti-Fraud Policy.

7.11 Procurement Documentation

ILA shall maintain complete procurement records for all grant-funded purchases.

Procurement files shall include:

a. Procurement request;

b. Approved budget confirmation;

c. Quotations or tender documents;

d. Evaluation records;

e. Approvals;

f. Contracts or purchase orders;

g. Delivery documentation;

h. Payment records;

i. Supplier correspondence.

Procurement records shall be available for audit and donor review.

7.12 Contract Management

Where procurement involves contracts, ILA shall ensure proper contract management.

Contract management shall include:

a. Clear terms and conditions;

b. Performance monitoring;

c. Delivery verification;

d. Payment controls;

e. Management of variations;

f. Contract completion records.

Contract amendments shall require appropriate review and approval.

7.13 Asset Acquisition Under Grants

Assets purchased through grant funding shall only be acquired for approved programme purposes.

Assets may include:

- Vehicles;
- Computers and ICT equipment;
- Office equipment;
- Furniture;
- Specialized programme equipment;
- Other long-term resources.

Before acquisition, ILA shall confirm:

a. Budget approval;

b. Donor eligibility;

c. Procurement compliance;

d. Operational necessity.

7.14 Asset Registration

All grant-funded assets shall be recorded in the ILA Asset Register.

Asset records shall include:

a. Asset description;

b. Identification number;

c. Purchase date;

d. Purchase value;

e. Funding source;

f. Location;

g. Responsible user;

h. Condition status.

Assets shall be tagged where practical.

7.15 Asset Use and Control

Grant-funded assets shall:

a. Be used only for authorized purposes;

b. Remain under organizational control;

c. Be protected from loss or damage;

d. Be properly maintained;

e. Not be transferred without approval.

Employees assigned assets shall be responsible for their proper use and protection.

7.16 Asset Verification

ILA shall conduct periodic physical verification of grant-funded assets.

Verification shall confirm:

a. Existence of assets;

b. Physical condition;

c. Location;

d. Assigned user;

e. Continued relevance.

Verification reports shall be maintained for accountability purposes.

7.17 Vehicle Management Under Grants

Where vehicles are purchased or financed through grants, ILA shall ensure:

a. Proper registration;

b. Authorized use;

c. Maintenance schedules;

d. Fuel controls;

e. Driver authorization;

f. Journey documentation.

Vehicles shall only be used for approved organizational purposes.

7.18 ICT Equipment Management

Grant-funded ICT equipment shall be managed in accordance with:

- ILA ICT Policy;
- Data Protection and Privacy Policy;

- Asset Management procedures.

Controls shall include:

a. User assignment;

b. Security protection;

c. Maintenance;

d. Software compliance;

e. Responsible disposal.

7.19 Asset Disposal

Disposal of grant-funded assets shall follow:

a. ILA Asset Management procedures;

b. Donor requirements;

c. Legal requirements.

Before disposal, ILA shall determine:

a. Asset condition;

b. Remaining useful value;

c. Donor approval requirements;

d. Appropriate disposal method.

Disposal shall be documented and transparent.

7.20 Procurement and Asset Audit

Grant-funded procurement and assets shall be subject to:

a. Internal reviews;

b. Donor verification;

c. External audits;

d. Physical inspections.

ILA shall address identified weaknesses and implement corrective actions.

7.21 Procurement Fraud Prevention

ILA shall maintain controls to prevent:

- Supplier collusion;
- Inflated pricing;
- Fraudulent invoices;
- Unauthorized purchases;
- Conflict of interest;
- Misuse of assets.

Suspected procurement misconduct shall be reported through established whistleblowing mechanisms.

7.22 Procurement and Asset Reporting

Where required, ILA shall provide donors with information regarding:

a. Major procurements;

b. Asset acquisitions;

c. Asset utilization;

d. Disposal activities;

e. Compliance with procurement requirements.

7.23 Procurement and Asset Closure Procedures

At grant completion, ILA shall:

a. Verify grant-funded assets;

b. Reconcile procurement records;

c. Confirm asset ownership requirements;

d. Complete required donor documentation;

e. Update asset registers.

CHAPTER EIGHT

HUMAN RESOURCE MANAGEMENT UNDER GRANTS

8.1 Introduction

Human resources are essential to the successful implementation of grant-funded programmes. The Initiative for Legal Aid (ILA) recognizes that qualified, ethical, and properly managed personnel are necessary to achieve programme objectives, maintain donor confidence, and ensure effective delivery of legal aid and organizational interventions.

Grant-funded personnel shall be recruited, managed, supervised, and compensated in accordance with:

- Approved grant agreements;
- Donor requirements;
- ILA Human Resource and Administration Policy;
- Applicable labour laws;
- Organizational values and ethical standards.

This Chapter establishes the framework for managing employees, consultants, volunteers, and other personnel whose costs are funded wholly or partially through grants.

8.2 Human Resource Management Principles

ILA shall manage grant-funded personnel according to the following principles:

a) Merit and Competence

Recruitment and selection shall be based on qualifications, skills, experience, and suitability for the position.

b) Fairness and Equality

All personnel shall be treated fairly without discrimination based on gender, disability, ethnicity, nationality, religion, or other protected characteristics.

c) Transparency

Human resource decisions shall be documented and conducted through established procedures.

d) Accountability

Grant-funded staff shall be responsible for achieving assigned duties and complying with organizational policies.

e) Professionalism

All personnel shall uphold ILA’s values, Code of Conduct, safeguarding commitments, and ethical standards.

8.3 Grant Staffing Planning

Before commencement of grant activities, ILA shall develop a staffing plan identifying the human resources required for implementation.

The staffing plan shall include:

a. Positions required;

b. Job descriptions;

c. Reporting lines;

d. Contract duration;

e. Salary costs;

f. Funding allocation;

g. Recruitment timelines.

The staffing structure shall correspond with approved grant budgets and implementation requirements.

8.4 Grant-Funded Positions

Grant-funded positions may include:

- Project managers;
- Legal officers;
- Paralegals;
- Programme officers;
- Finance officers;
- Monitoring and evaluation personnel;
- Administrative staff;
- Consultants;
- Technical specialists.

All positions shall have clearly defined responsibilities and performance expectations.

8.5 Recruitment of Grant-Funded Staff

ILA shall recruit grant-funded personnel through fair, transparent, and competitive processes.

Recruitment procedures shall include:

a. Approval of position;

b. Preparation of job description;

c. Vacancy announcement where appropriate;

d. Application review;

e. Interviews and assessment;

f. Selection approval;

g. Documentation of recruitment decisions.

Recruitment shall comply with donor requirements where applicable.

8.6 Equal Opportunity and Diversity in Recruitment

ILA shall promote equal opportunity in recruitment and employment.

The Organization shall:

a. Encourage diversity among staff;

b. Promote gender balance;

c. Provide reasonable accommodation where possible;

d. Prevent discrimination;

e. Ensure fair assessment of candidates.

Recruitment decisions shall be based on competence and suitability.

8.7 Employment Contracts

All grant-funded employees shall have written contracts specifying:

a. Job title;

b. Duties and responsibilities;

c. Reporting arrangements;

d. Contract duration;

e. Remuneration;

f. Benefits;

g. Confidentiality obligations;

h. Applicable organizational policies.

Employment contracts shall comply with applicable labour laws.

8.8 Consultants and Short-Term Personnel

Where specialized expertise is required, ILA may engage consultants or short-term personnel.

Consultant engagement shall include:

a. Defined terms of reference;

b. Agreed deliverables;

c. Contract terms;

d. Payment arrangements;

e. Confidentiality obligations;

f. Performance expectations.

Consultant costs charged to grants shall comply with donor rules.

8.9 Volunteer Management Under Grants

Where volunteers support grant implementation, ILA shall ensure:

a. Clear volunteer roles;

b. Appropriate orientation;

c. Supervision;

d. Compliance with safeguarding standards;

e. Documentation of volunteer contributions.

Volunteers shall not perform duties requiring professional qualifications unless appropriately authorized.

8.10 Staff Induction and Orientation

All grant-funded personnel shall receive orientation before commencing work.

Orientation shall cover:

a. ILA mission and values;

b. Grant objectives;

c. Job responsibilities;

d. Organizational policies;

e. Safeguarding requirements;

f. Code of Conduct;

g. Reporting procedures;

h. Confidentiality obligations.

8.11 Staff Performance Management

ILA shall establish performance management systems for grant-funded personnel.

Performance management shall include:

a. Clear objectives;

b. Regular supervision;

c. Performance reviews;

d. Feedback mechanisms;

e. Professional development planning.

Performance assessments shall consider both technical performance and compliance with organizational values.

8.12 Staff Training and Capacity Building

ILA shall promote continuous learning and capacity development.

Training may cover:

- Legal aid service delivery;
- Grant compliance;
- Financial procedures;
- Safeguarding;
- Data protection;
- Monitoring and reporting;
- Professional ethics.

Training activities shall be planned and documented.

8.13 Staff Time Allocation and Cost Charging

Personnel costs charged to grants shall accurately reflect staff involvement in grant activities.

ILA shall maintain appropriate documentation, including:

a. Employment records;

b. Salary records;

c. Timesheets where required;

d. Allocation records;

e. Approved salary scales.

Costs shall not be charged to multiple grants unless properly allocated.

8.14 Payroll Management

Grant-funded payroll shall comply with:

- Approved budgets;
- Employment contracts;
- ILA financial procedures;
- Applicable tax and labour requirements.

Payroll controls shall include:

a. Verification of employee records;

b. Approval of payroll;

c. Accurate calculation of benefits;

d. Proper documentation;

e. Secure payment procedures.

8.15 Staff Code of Conduct and Ethics

All grant-funded personnel shall comply with the ILA Code of Conduct and Ethics Policy.

Personnel shall:

a. Act professionally;

b. Avoid conflicts of interest;

c. Protect confidential information;

d. Respect beneficiaries;

e. Prevent exploitation and abuse;

f. Maintain organizational integrity.

8.16 Safeguarding Responsibilities

All grant-funded personnel shall comply with safeguarding obligations.

Staff shall:

a. Respect the dignity and rights of beneficiaries;

b. Prevent sexual exploitation, abuse, and harassment;

c. Report safeguarding concerns;

d. Participate in safeguarding training.

Violations shall be investigated and addressed according to ILA safeguarding procedures.

8.17 Staff Discipline and Misconduct

ILA shall maintain procedures for addressing misconduct among grant-funded personnel.

Misconduct may include:

a. Fraud;

b. Corruption;

c. Abuse of authority;

d. Harassment;

e. Breach of confidentiality;

f. Misuse of grant resources;

g. Violation of organizational policies.

Disciplinary actions shall follow fair procedures.

8.18 Staff Safety and Security

ILA shall take reasonable measures to protect grant-funded personnel.

Security measures may include:

a. Risk assessments;

b. Safety briefings;

c. Emergency procedures;

d. Field movement protocols;

e. Incident reporting mechanisms.

8.19 Staff Transition and Grant Closure

Where grants end, ILA shall manage staff transition responsibly.

Actions may include:

a. Advance communication;

b. Completion of pending responsibilities;

c. Final performance reviews;

d. Clearance procedures;

e. Contract closure;

f. Transfer of knowledge and documentation.

8.20 Human Resource Records Management

ILA shall maintain accurate records for all grant-funded personnel.

Records shall include:

- Recruitment documents;
- Contracts;
- Job descriptions;
- Payroll information;
- Performance records;
- Training records;
- Disciplinary records where applicable.

Personnel information shall be managed in accordance with the ILA Data Protection and Privacy Policy.

8.21 Human Resource Compliance Monitoring

The Human Resource Department shall periodically review grant-funded staffing arrangements to ensure:

a. Compliance with contracts;

b. Proper cost allocation;

c. Availability of required skills;

d. Adherence to labour requirements;

e. Compliance with donor conditions.

8.22 Responsibilities for Grant Human Resource Management

Executive Director

Shall provide overall oversight of grant staffing decisions.

Human Resource Department

Shall manage recruitment, contracts, records, and staff welfare.

Programme Managers

Shall supervise technical performance of grant-funded personnel.

Finance Department

Shall verify salary payments and personnel cost allocations.

Staff Members

Shall perform assigned duties and comply with all organizational policies.

CHAPTER NINE

PARTNERSHIP AND SUB-GRANT MANAGEMENT

9.1 Introduction

The Initiative for Legal Aid (ILA) recognizes that effective partnerships are essential for expanding access to justice, strengthening community engagement, improving programme effectiveness, and achieving sustainable impact.

In implementing grant-funded programmes, ILA may collaborate with civil society organizations, community-based organizations, government institutions, professional bodies, academic institutions, and other strategic partners.

Where grant agreements permit, ILA may provide funding support to implementing partners through sub-grants. Such arrangements require strong governance, due diligence, financial controls, monitoring mechanisms, and accountability measures.

This Chapter establishes the framework governing partnership selection, assessment, agreements, sub-grant administration, monitoring, reporting, and closure.

9.2 Partnership Principles

ILA shall establish and manage partnerships based on the following principles:

a) Shared Objectives

Partnerships shall be established where organizations share common objectives and contribute toward achieving agreed programme results.

b) Mutual Respect

ILA shall promote respectful, transparent, and professional relationships with partners.

c) Accountability

Partners receiving ILA resources shall be accountable for proper use of funds and achievement of agreed results.

d) Transparency

Partnership decisions, agreements, financial arrangements, and performance expectations shall be clearly documented.

e) Capacity Strengthening

ILA shall promote partnerships that contribute to institutional learning and strengthening of local capacities.

f) Risk Management

ILA shall assess and manage risks associated with partnerships and sub-grants.

9.3 Types of Partnerships

ILA may establish different forms of partnerships, including:

a) Strategic Partnerships

Long-term relationships supporting shared institutional goals.

b) Implementation Partnerships

Partnerships established to jointly deliver specific programmes or activities.

c) Technical Partnerships

Collaboration with organizations providing specialized expertise.

d) Community Partnerships

Engagement with community groups, local structures, and beneficiary organizations.

e) Sub-Grant Partnerships

Formal arrangements where ILA transfers grant resources to another organization to implement approved activities.

9.4 Partner Identification and Selection

Partners shall be selected based on objective criteria.

Potential partners may be assessed based on:

a. Legal status and registration;

b. Organizational reputation;

c. Technical capacity;

d. Experience in relevant areas;

e. Financial management capacity;

f. Governance systems;

g. Safeguarding standards;

h. Geographical presence;

i. Alignment with ILA values.

Selection decisions shall be documented.

9.5 Partner Due Diligence

Before entering into a partnership or sub-grant arrangement, ILA shall conduct appropriate due diligence.

Due diligence shall consider:

Organizational Assessment

- Legal registration;
- Governance structure;
- Institutional capacity;
- Previous experience.

Financial Assessment

- Accounting systems;
- Financial controls;
- Audit history;
- Ability to manage funds.

Compliance Assessment

- Anti-fraud measures;
- Safeguarding systems;
- Ethical standards;
- Data protection practices.

Risk Assessment

- Operational risks;
- Reputational risks;
- Financial risks;
- Implementation risks.

9.6 Partner Capacity Assessment

ILA shall assess partner capacity before assigning implementation responsibilities.

The assessment shall identify:

a. Strengths;

b. Weaknesses;

c. Support requirements;

d. Monitoring needs;

e. Capacity-building opportunities.

Where gaps are identified, ILA may provide technical assistance or strengthen oversight arrangements.

9.7 Partnership Approval Process

Partnerships shall be approved through appropriate institutional procedures.

Approval shall consider:

a. Strategic relevance;

b. Partner suitability;

c. Available resources;

d. Risk assessment;

e. Legal implications;

f. Donor requirements.

No partnership shall commence without appropriate approval and documentation.

9.8 Partnership Agreements

All formal partnerships shall be governed by written agreements.

Partnership agreements shall include:

a. Purpose and objectives;

b. Roles and responsibilities;

c. Implementation arrangements;

d. Financial arrangements;

e. Reporting requirements;

f. Monitoring arrangements;

g. Confidentiality obligations;

h. Safeguarding requirements;

i. Dispute resolution procedures;

j. Termination provisions.

9.9 Sub-Grant Management Framework

Where ILA provides funding to another organization to implement grant activities, the arrangement shall be managed as a sub-grant.

Sub-grants shall comply with:

- Donor requirements;
- Grant agreements;
- ILA financial controls;
- Procurement requirements;
- Monitoring procedures.

ILA shall remain accountable to donors for proper oversight of sub-granted resources.

9.10 Sub-Grant Due Diligence

Before issuing a sub-grant, ILA shall assess:

a. Partner eligibility;

b. Financial capacity;

c. Programme capacity;

d. Governance systems;

e. Compliance mechanisms;

f. Safeguarding arrangements;

g. Previous performance.

The level of assessment shall depend on the size, complexity, and risk of the sub-grant.

9.11 Sub-Grant Agreements

All sub-grants shall be governed by written sub-grant agreements.

Sub-grant agreements shall specify:

a. Amount of funding;

b. Approved activities;

c. Implementation period;

d. Budget;

e. Reporting requirements;

f. Payment schedule;

g. Eligible expenditure rules;

h. Audit rights;

i. Monitoring requirements;

j. Termination conditions.

9.12 Transfer of Sub-Grant Funds

Sub-grant funds shall only be transferred after:

a. Agreement signing;

b. Completion of required due diligence;

c. Approval of implementation plans;

d. Confirmation of banking arrangements;

e. Fulfilment of donor conditions.

Payments shall be linked to agreed milestones where appropriate.

9.13 Partner Financial Management Requirements

Partners receiving grant funds shall maintain adequate financial systems.

Requirements may include:

a. Proper accounting records;

b. Supporting documentation;

c. Approved budgets;

d. Expenditure controls;

e. Financial reporting;

f. Audit cooperation.

ILA may provide financial guidance where necessary.

9.14 Partner Procurement Requirements

Partners shall conduct procurement in accordance with:

a. Sub-grant agreements;

b. Donor requirements;

c. Approved procurement procedures.

ILA shall assess partner procurement capacity and provide additional oversight where required.

9.15 Partner Reporting Requirements

Partners shall provide timely reports as specified in partnership agreements.

Reports may include:

Programme Reports

- Activities completed;
- Results achieved;
- Challenges;
- Lessons learned.

Financial Reports

- Expenditure statements;
- Supporting documentation;
- Budget performance.

Failure to provide required reports may result in corrective action or suspension of funding.

9.16 Partner Monitoring and Support

ILA shall monitor partner performance through:

a. Progress reviews;

b. Field visits;

c. Document reviews;

d. Financial verification;

e. Technical support;

f. Partner meetings.

Monitoring shall focus on:

- Compliance;
- Quality;
- Results;
- Resource utilization;
- Risk management.

9.17 Partner Audits and Verification

ILA may conduct or commission reviews of partner activities.

Verification may include:

a. Financial reviews;

b. Procurement checks;

c. Asset verification;

d. Programme assessments;

e. Compliance reviews.

Partners shall provide access to relevant records and information.

9.18 Partner Safeguarding Requirements

All partners shall comply with ILA safeguarding standards.

Partners shall:

a. Protect beneficiaries from exploitation and abuse;

b. Maintain appropriate safeguarding procedures;

c. Report safeguarding concerns;

d. Ensure staff and volunteers follow ethical standards.

9.19 Partner Data Protection Responsibilities

Partners handling personal information on behalf of ILA shall comply with:

- ILA Data Protection and Privacy Policy;
- Applicable data protection requirements;
- Confidentiality obligations.

Partners shall ensure:

a. Secure data handling;

b. Controlled access;

c. Appropriate storage;

d. Responsible sharing of information.

9.20 Managing Partner Performance Issues

Where partners fail to meet obligations, ILA shall implement corrective measures.

Actions may include:

a. Additional guidance;

b. Capacity support;

c. Improvement plans;

d. Increased monitoring;

e. Suspension of funds;

f. Termination of partnership.

9.21 Conflict of Interest in Partnerships

Partners shall disclose any conflict of interest affecting partnership decisions or resource use.

ILA shall assess disclosed conflicts and take appropriate action to protect integrity and accountability.

9.22 Partnership Closure

At the end of a partnership or sub-grant, ILA shall ensure:

a. Completion of agreed activities;

b. Submission of final reports;

c. Financial reconciliation;

d. Return or disposition of assets where required;

e. Closure of outstanding obligations;

f. Documentation of lessons learned.

9.23 Partnership Records Management

ILA shall maintain complete partnership records, including:

- Due diligence documents;
- Agreements;
- Reports;
- Monitoring records;
- Financial documentation;
- Correspondence;
- Closure documents.

Records shall be maintained according to ILA document retention requirements.

9.24 Responsibilities

Executive Director

Provides overall approval and oversight of strategic partnerships.

Grants Management Function

Coordinates partnership compliance and reporting.

Programme Department

Manages technical partnership relationships.

Finance Department

Monitors financial compliance and sub-grant accountability.

Legal and Compliance Function

Reviews agreements and legal obligations.

MEAL Department

Supports monitoring and performance assessment.

CHAPTER TEN

MONITORING, EVALUATION, ACCOUNTABILITY AND LEARNING (MEAL) FOR GRANTS

10.1 Introduction

The Initiative for Legal Aid (ILA) recognizes Monitoring, Evaluation, Accountability and Learning (MEAL) as a critical component of effective grant management. MEAL systems enable the Organization to measure progress, assess results, demonstrate accountability, improve programme quality, and generate evidence for decision-making.

All grant-funded programmes shall establish appropriate MEAL mechanisms that are proportionate to the nature, size, complexity, and requirements of the grant.

MEAL activities shall ensure that ILA, donors, partners, beneficiaries, and stakeholders have reliable information regarding programme performance, outcomes, challenges, and lessons learned.

This Chapter establishes the framework governing MEAL planning, implementation, data management, accountability mechanisms, evaluation, and organizational learning under grant-funded activities.

10.2 MEAL Principles for Grant Management

ILA shall implement MEAL systems based on the following principles:

a) Results-Based Management

Grant implementation shall focus on achieving measurable outputs, outcomes, and impact.

b) Evidence-Based Decision Making

Programme decisions shall be informed by reliable data, analysis, and learning.

c) Accountability to Beneficiaries

ILA shall ensure that communities and beneficiaries have opportunities to provide feedback and influence programme improvement.

d) Participation and Inclusion

MEAL processes shall promote participation of beneficiaries, partners, and relevant stakeholders.

e) Data Quality and Integrity

Information collected shall be accurate, reliable, timely, and appropriately managed.

f) Continuous Learning

ILA shall use evidence and experience to improve current and future programmes.

10.3 Grant MEAL Framework

Every significant grant shall have a MEAL framework developed during the design or start-up phase.

The MEAL framework shall include:

a. Programme objectives;

b. Expected results;

c. Indicators;

d. Baselines;

e. Targets;

f. Data sources;

g. Data collection methods;

h. Reporting timelines;

i. Responsibilities.

The MEAL framework shall align with donor requirements and ILA's institutional MEAL Policy.

10.4 Results Framework

ILA shall develop a results framework for grant-funded programmes.

The framework shall define the relationship between:

Inputs

Resources required for implementation, including funding, personnel, equipment, and expertise.

Activities

Actions undertaken to achieve programme objectives.

Outputs

Immediate products or services delivered.

Outcomes

Changes resulting from programme interventions.

Impact

Long-term improvement or transformation resulting from the programme.

10.5 Grant Indicators and Targets

Each grant shall establish appropriate indicators to measure progress and performance.

Indicators may include:

Output Indicators

Examples:

- Number of legal aid cases handled;
- Number of legal awareness sessions conducted;
- Number of beneficiaries reached.

Outcome Indicators

Examples:

- Improved access to justice;
- Increased legal awareness;
- Improved community confidence in justice mechanisms.

Quality Indicators

Examples:

- Beneficiary satisfaction;
- Service quality;
- Timeliness of assistance.

Indicators shall be:

a. Specific;

b. Measurable;

c. Achievable;

d. Relevant;

e. Time-bound.

10.6 Baseline Assessment

Where appropriate, ILA shall conduct baseline assessments before implementation.

Baseline information shall help determine:

a. Existing conditions;

b. Beneficiary needs;

c. Programme targets;

d. Expected changes.

Baseline findings shall inform programme planning and measurement.

10.7 Monitoring Plans

Each grant shall have a monitoring plan outlining:

a. Indicators to be monitored;

b. Data sources;

c. Frequency of monitoring;

d. Responsible persons;

e. Reporting requirements.

Monitoring plans shall be reviewed periodically to ensure relevance.

10.8 Data Collection and Management

ILA shall establish appropriate systems for collecting, storing, analyzing, and reporting programme data.

Data collection methods may include:

- Beneficiary registration;
- Case management records;
- Surveys;
- Interviews;
- Focus group discussions;
- Observation;
- Field monitoring.

Data collection shall comply with:

- Ethical standards;
- Confidentiality requirements;
- Data protection obligations.

10.9 Data Quality Assurance

ILA shall maintain procedures to ensure data quality.

Data quality checks shall assess:

a. Accuracy;

b. Completeness;

c. Consistency;

d. Reliability;

e. Timeliness.

The MEAL Department shall conduct periodic data verification exercises.

10.10 Beneficiary Accountability Mechanisms

ILA shall establish mechanisms allowing beneficiaries and communities to provide feedback and raise concerns.

Accountability mechanisms may include:

a. Feedback channels;

b. Complaint mechanisms;

c. Community consultations;

d. Beneficiary satisfaction assessments.

ILA shall ensure that feedback is:

- Received;
- Documented;
- Reviewed;
- Responded to appropriately.

10.11 Complaints and Feedback Management

All grant-funded programmes shall maintain accessible complaint and feedback mechanisms.

Complaints shall be:

a. Handled confidentially;

b. Recorded appropriately;

c. Investigated where necessary;

d. Resolved within reasonable timelines.

Sensitive complaints, including safeguarding concerns, shall be handled according to applicable ILA policies.

10.12 Field Monitoring

ILA shall conduct regular monitoring visits to assess implementation progress.

Field monitoring shall review:

a. Activity implementation;

b. Beneficiary engagement;

c. Quality of services;

d. Resource utilization;

e. Challenges and risks.

Monitoring findings shall inform corrective actions and programme improvement.

10.13 Programme Evaluation

Where required by donors or considered beneficial, ILA shall conduct evaluations of grant-funded programmes.

Evaluations may assess:

Relevance

Whether activities addressed identified needs.

Effectiveness

Whether objectives were achieved.

Efficiency

Whether resources were used appropriately.

Sustainability

Whether benefits are likely to continue.

Impact

Whether meaningful change occurred.

10.14 Types of Evaluations

ILA may conduct:

a) Baseline Evaluations

Conducted before implementation to establish starting conditions.

b) Mid-Term Evaluations

Conducted during implementation to assess progress and improve performance.

c) Final Evaluations

Conducted at completion to assess achievements and lessons.

d) Impact Evaluations

Conducted to assess longer-term effects.

10.15 Learning and Knowledge Management

ILA shall promote learning throughout the grant lifecycle.

Learning activities may include:

a. Reflection meetings;

b. lLessons learned workshops;

c. After-action reviews;

d. Documentation of best practices;

e. Knowledge sharing.

Lessons learned shall inform future programme design and organizational improvement.

10.16 Adaptive Programme Management

ILA shall use MEAL findings to adjust implementation where necessary.

Adaptive management may involve:

a. Modifying activities;

b. Improving service delivery;

c. Addressing emerging risks;

d. Reallocating resources where approved;

e. Strengthening partnerships.

Changes shall comply with donor requirements.

10.17 Grant Performance Reviews

ILA shall conduct periodic grant performance reviews involving relevant departments.

Reviews shall consider:

a. Achievement of targets;

b. Financial performance;

c. Implementation challenges;

d. Risks;

e. Corrective actions;

f. Lessons learned.

10.18 MEAL Reporting Requirements

MEAL information shall contribute to:

a. Internal management reports;

b. Donor progress reports;

c. Evaluation reports;

d. Learning documents;

e. Institutional performance reviews.

Reports shall be accurate, timely, and evidence-based.

10.19 Protection of Programme Data

All MEAL data shall be managed responsibly.

ILA shall ensure:

a. Confidentiality;

b. Secure storage;

c. Controlled access;

d. Responsible sharing;

e. Compliance with data protection requirements.

Personal information collected through MEAL processes shall be handled according to the ILA Data Protection and Privacy Policy.

10.20 Responsibilities

Board of Directors

Provides oversight regarding organizational performance and accountability.

Executive Director

Ensures effective implementation of MEAL requirements.

MEAL Department

Leads monitoring, evaluation, accountability, and learning processes.

Programme Department

Provides implementation information and uses findings for improvement.

Finance Department

Supports financial performance monitoring.

Grants Management Function

Ensures donor MEAL requirements are fulfilled.

Project Managers

Maintain accurate programme records and implement corrective actions.

10.21 MEAL Compliance Monitoring

ILA shall periodically review grant MEAL systems to ensure:

a. Compliance with donor requirements;

b. Availability of reliable evidence;

c. Effective use of monitoring information;

d. Implementation of recommendations.

CHAPTER ELEVEN

GRANT REPORTING AND COMMUNICATION

11.1 Introduction

Effective reporting and communication are essential elements of accountable grant management. The Initiative for Legal Aid (ILA) recognizes that timely, accurate, and transparent reporting strengthens donor confidence, demonstrates responsible stewardship of resources, and enables effective decision-making.

Grant reporting provides evidence of programme achievements, financial performance, challenges, risks, lessons learned, and corrective actions.

This Chapter establishes the standards and procedures governing internal reporting, donor reporting, financial and narrative reporting, communication with donors, visibility obligations, and management of grant-related information.

11.2 Grant Reporting Principles

ILA shall conduct grant reporting based on the following principles:

a) Accuracy

All reports shall contain truthful, verified, and reliable information.

b) Timeliness

Reports shall be submitted within agreed deadlines.

c) Completeness

Reports shall address all requirements specified in grant agreements.

d) Transparency

Reports shall openly communicate achievements, challenges, risks, and corrective actions.

e) Evidence-Based Reporting

All reported results shall be supported by appropriate documentation and evidence.

f) Consistency

Programme and financial reports shall correspond with approved plans, budgets, and accounting records.

11.3 Grant Reporting Framework

Each grant shall have a reporting framework established during the grant start-up phase.

The framework shall identify:

a. Reporting requirements;

b. Reporting frequency;

c. Responsible persons;

d. Approval procedures;

e. Submission deadlines;

f. Required formats;

g. Supporting documentation.

The Grants Management Function shall maintain a grant reporting calendar.

11.4 Types of Grant Reports

ILA grant reporting shall generally include:

a) Internal Reports

Prepared for management decision-making and oversight.

b) Narrative Reports

Prepared to explain programme implementation, results, challenges, and lessons.

c) Financial Reports

Prepared to demonstrate expenditure and financial compliance.

d) Monitoring Reports

Prepared to present performance data and indicator progress.

e) Audit Reports

Prepared following financial or compliance reviews.

f) Final Grant Reports

Prepared at the conclusion of grant activities.

11.5 Internal Grant Reporting

Internal reporting enables ILA management to monitor performance and address emerging issues.

Project Managers shall provide regular internal updates covering:

a. Activities completed;

b. Progress against work plans;

c. Achievement of indicators;

d. Budget performance;

e. Procurement status;

f. Risks and challenges;

g. Required decisions.

Internal reports shall be reviewed by relevant departments before escalation to management.

11.6 Donor Narrative Reporting

Narrative reports shall provide a comprehensive explanation of grant implementation.

Narrative reports shall include:

a. Summary of achievements;

b. Activities implemented;

c. Beneficiaries reached;

d. Progress against indicators;

e. Challenges encountered;

f. Mitigation measures;

g. Lessons learned;

h. Future plans.

Narrative reports shall reflect both successes and implementation challenges.

11.7 Donor Financial Reporting

Financial reports shall demonstrate responsible management of grant funds.

Financial reports shall include:

a. Expenditure against approved budget;

b. Financial explanations;

c. Budget variance analysis;

d. Cash utilization information;

e. Supporting documentation where required.

Financial reports shall be prepared by Finance and reviewed before submission.

11.8 Coordination Between Programme and Finance Reporting

Programme and financial reports shall be prepared in coordination to ensure consistency.

Before submission:

a. Reported activities shall correspond with expenditure;

b. Reported outputs shall align with financial investment;

c. Budget explanations shall reflect implementation realities;

d. Discrepancies shall be resolved.

11.9 Report Preparation Process

The grant reporting process shall include:

Step One: Data Collection

Relevant departments provide required information.

Step Two: Draft Preparation

Responsible officers prepare draft reports.

Step Three: Internal Review

Reports are reviewed for accuracy, completeness, and compliance.

Step Four: Approval

Authorized persons approve reports before submission.

Step Five: Submission

Reports are submitted to donors within agreed timelines.

11.10 Review and Approval of Reports

Before submission, grant reports shall be reviewed by:

- Project Manager;
- Programme Department;
- Finance Department;
- MEAL Department;
- Grants Management Function;
- Executive Director where required.

The review shall confirm:

a. Accuracy of information;

b. Consistency with grant agreements;

c. Completeness of documentation;

d. Compliance with donor requirements.

11.11 Reporting Deadlines

ILA shall maintain a reporting calendar for all grants.

Responsible departments shall ensure:

a. Awareness of deadlines;

b. Timely preparation of information;

c. Adequate review time;

d. Timely submission.

Failure to meet reporting deadlines shall be treated as a grant compliance issue.

11.12 Management of Reporting Delays

Where reporting delays occur, ILA shall:

a. Identify reasons for delay;

b. Notify relevant management;

c. Communicate with donors where necessary;

d. Establish corrective measures.

Delays shall not be concealed or misrepresented.

11.13 Donor Communication Management

ILA shall maintain professional and timely communication with donors.

Donor communication shall include:

a. Grant updates;

b. Clarification requests;

c. Amendment requests;

d. Implementation challenges;

e. Significant risks;

f. Success stories.

Official donor communication shall be coordinated through authorized representatives.

11.14 Donor Visits and Monitoring Missions

Where donors conduct monitoring visits, ILA shall facilitate access to:

a. Programme sites;

b. Project documentation;

c. Financial records;

d. Beneficiaries where appropriate;

e. Relevant staff.

Donor visits shall be documented, and agreed action points shall be followed up.

11.15 Grant Visibility and Branding Requirements

Where required by donors, ILA shall comply with visibility and communication obligations.

Visibility activities may include:

a. Acknowledgement of donor support;

b. Approved use of logos;

c. Publications;

d. Community communication materials;

e. Public events.

All visibility activities shall respect:

- Beneficiary dignity;
- Confidentiality;
- Safeguarding principles;
- Data protection requirements.

11.16 Communication Materials

Any public communication related to grant-funded activities shall be accurate, ethical, and consistent with ILA values.

Materials may include:

- Reports;
- Newsletters;
- Website content;
- Social media publications;
- Press releases;
- Programme summaries.

Where beneficiary information is used, appropriate consent and confidentiality measures shall apply.

11.17 Confidentiality and Information Sharing

ILA shall ensure that grant information is shared responsibly.

Confidential information shall include:

a. Beneficiary personal information;

b. Legal case information;

c. Sensitive programme data;

d. Financial information where restricted.

Information sharing shall comply with donor agreements and the ILA Data Protection and Privacy Policy.

11.18 Grant Success Stories and Case Studies

ILA may develop success stories and case studies to demonstrate programme impact.

Such materials shall:

a. Accurately represent programme outcomes;

b. Obtain appropriate consent where individuals are identified;

c. Protect vulnerable persons;

d. Avoid exploitation of beneficiary experiences.

11.19 Corrective Reporting

Where errors, omissions, or significant changes are identified after submission of reports, ILA shall:

a. Assess the issue;

b. Notify relevant parties where necessary;

c. Submit corrected information;

d. Document corrective actions.

11.20 Final Grant Reporting

At the conclusion of a grant, ILA shall prepare final reports covering:

a. Overall achievements;

b. Outcomes achieved;

c. Expenditure summary;

d. Remaining balances;

e. Assets acquired;

f. Lessons learned;

g. Sustainability measures.

Final reports shall support proper grant closure.

11.21 Record Retention of Reports

All grant reports shall be maintained in the official grant file.

Records shall include:

- Submitted reports;
- Approval records;
- Donor feedback;
- Correspondence;
- Supporting documents;
- Revised submissions.

Records shall be retained according to ILA record management requirements.

11.22 Responsibilities

Grants Management Function

Responsible for coordinating grant reporting schedules and compliance.

Programme Department

Responsible for technical and narrative reporting.

Finance Department

Responsible for financial reporting accuracy.

MEAL Department

Responsible for performance data and evidence.

Project Managers

Responsible for timely provision of implementation information.

Executive Director

Responsible for final approval of significant reports.

11.23 Reporting Compliance Monitoring

ILA shall periodically review reporting performance to assess:

a. Timeliness;

b. Quality;

c. Donor feedback;

d. Recurring challenges;

e. Improvement opportunities.

CHAPTER TWELVE

GRANT RISK MANAGEMENT AND COMPLIANCE

12.1 Introduction

The Initiative for Legal Aid (ILA) recognizes that grant-funded programmes operate in dynamic environments that expose the Organization to strategic, operational, financial, legal, security, reputational, safeguarding, and compliance risks. Effective risk management and compliance are essential to protecting grant resources, achieving programme objectives, maintaining donor confidence, and ensuring organizational sustainability.

ILA shall establish and maintain an integrated grant risk management and compliance framework that identifies, assesses, monitors, mitigates, and reports risks throughout the grant lifecycle.

This Chapter shall be implemented in conjunction with the ILA Risk Management Policy, Anti-Fraud, Corruption and Whistleblowing Policy, Data Protection and Privacy Policy, Code of

Conduct and Ethics Policy, Human Resource and Administration Policy, Procurement and Assets Management Policy, and all applicable donor requirements.

12.2 Objectives

The objectives of this Chapter are to:

a. Establish a structured framework for identifying and managing grant-related risks;

b. Strengthen compliance with donor agreements, organizational policies, and applicable laws;

c. Safeguard grant resources from misuse, fraud, and abuse;

d. Promote accountability, transparency, and ethical conduct;

e. Enhance organizational resilience and programme continuity; and

f. Support informed decision-making throughout the grant lifecycle.

12.3 Guiding Principles

ILA shall manage grant risks and compliance based on the following principles:

a) Proactive Risk Management

Risks shall be identified and managed before they significantly affect programme implementation.

b) Accountability

All personnel shall be responsible for identifying and reporting risks within their areas of responsibility.

c) Compliance

Grant activities shall comply with donor agreements, organizational policies, and legal requirements.

d) Transparency

Risk management decisions and compliance actions shall be documented and communicated appropriately.

e) Continuous Improvement

Risk management processes shall be regularly reviewed and strengthened based on lessons learned.

f) Shared Responsibility

Risk management shall be integrated into programme planning, implementation, monitoring, reporting, and closure.

12.4 Grant Risk Management Framework

ILA shall maintain a grant risk management framework consisting of:

a. Risk identification;

b. Risk assessment;

c. Risk analysis;

d. Risk treatment and mitigation;

e. Risk monitoring;

f. Risk reporting;

g. Periodic review and improvement.

Risk management shall be integrated into every stage of the grant lifecycle.

12.5 Categories of Grant Risks

ILA shall identify and manage risks including, but not limited to:

a) Strategic Risks

Risks affecting the achievement of grant objectives or organizational strategy.

b) Operational Risks

Risks arising from programme implementation, staffing, logistics, procurement, or operational processes.

c) Financial Risks

Risks relating to budgeting, expenditure, fraud, cash management, exchange rate fluctuations, or financial reporting.

d) Legal and Regulatory Risks

Risks associated with contracts, labour laws, taxation, registration, regulatory compliance, and litigation.

e) Compliance Risks

Risks arising from non-compliance with donor agreements, organizational policies, or legal obligations.

f) Reputational Risks

Risks that may damage the credibility, integrity, or public image of ILA.

g) Safeguarding Risks

Risks involving sexual exploitation, abuse, harassment, child protection concerns, or other forms of misconduct affecting beneficiaries or staff.

h) Security Risks

Risks related to conflict, civil unrest, crime, terrorism, natural disasters, or other events affecting personnel, beneficiaries, or operations.

i) Information and Cybersecurity Risks

Risks relating to unauthorized access, cyber-attacks, data loss, information breaches, or technology failures.

j) Environmental and Social Risks

Risks affecting communities, the environment, or vulnerable populations as a result of programme activities.

12.6 Risk Identification

Risk identification shall be conducted:

a. During grant proposal development;

b. Before grant acceptance;

c. During project inception;

d. Throughout implementation;

e. Before major operational decisions;

f. Prior to grant closure.

Risk identification may involve:

- Management meetings;
- Staff consultations;
- Field assessments;
- Stakeholder engagement;
- Donor communications;
- Audit findings;
- Monitoring reports.

12.7 Risk Assessment

Each identified risk shall be assessed considering:

a. Likelihood of occurrence;

b. Potential impact;

c. Existing controls;

d. Residual risk;

e. Priority for action.

Risk assessments shall be documented and periodically reviewed.

12.8 Grant Risk Register

ILA shall maintain a Grant Risk Register for significant grants.

The Risk Register shall include:

a. Risk description;

b. Risk category;

c. Likelihood rating;

d. Impact rating;

e. Overall risk level;

f. Existing controls;

g. Mitigation actions;

h. Responsible officer;

i. Review date;

j. Current status.

The Risk Register shall be reviewed at least quarterly or more frequently where circumstances require.

12.9 Risk Mitigation Measures

Appropriate mitigation measures shall be developed for identified risks.

Mitigation measures may include:

a. Strengthening internal controls;

b. Revising implementation plans;

c. Increasing supervision;

d. Staff training;

e. Procurement safeguards;

f. Contingency planning;

g. Enhanced monitoring;

h. Insurance where appropriate;

i. Additional donor consultation.

Mitigation measures shall be proportionate to the significance of the risk.

12.10 Compliance Management

ILA shall establish systems to monitor compliance with:

a. Grant agreements;

b. Donor regulations;

c. Organizational policies;

d. Applicable laws and regulations;

e. Ethical standards;

f. Safeguarding obligations.

Compliance monitoring shall be integrated into routine management and oversight processes.

12.11 Compliance Reviews

Periodic compliance reviews shall be undertaken to assess adherence to grant requirements.

Compliance reviews may examine:

a. Programme implementation;

b. Financial management;

c. Procurement activities;

d. Human resource management;

e. Safeguarding compliance;

f. Data protection practices;

g. Reporting obligations.

Findings shall be documented, communicated, and followed by corrective actions where necessary.

12.12 Internal Control Systems

ILA shall maintain effective internal controls to reduce grant-related risks.

Internal controls shall include:

a. Segregation of duties;

b. Delegated approval authorities;

c. Financial reconciliations;

d. Procurement controls;

e. Asset management procedures;

f. Documentation requirements;

g. Supervisory reviews.

Internal controls shall be periodically evaluated for effectiveness.

12.13 Fraud, Corruption and Financial Misconduct

ILA adopts a zero-tolerance approach to fraud, corruption, bribery, theft, embezzlement, collusion, kickbacks, and any misuse of grant resources.

All personnel, partners, consultants, volunteers, and contractors shall immediately report suspected misconduct through established reporting channels.

Allegations shall be managed in accordance with the ILA Anti-Fraud, Corruption and Whistleblowing Policy.

12.14 Conflict of Interest

All individuals involved in grant management shall avoid situations that create actual, potential, or perceived conflicts of interest.

Any conflict shall be:

a. Declared promptly;

b. Documented;

c. Assessed by management;

d. Managed through appropriate mitigation measures.

Undisclosed conflicts may result in disciplinary or contractual action.

12.15 Safeguarding Compliance

ILA shall ensure compliance with safeguarding obligations throughout grant implementation.

Measures shall include:

a. Safeguarding risk assessments;

b. Staff screening;

c. Safeguarding training;

d. Reporting mechanisms;

e. Survivor-centred response procedures;

f. Monitoring compliance.

Safeguarding concerns shall be treated as high-priority compliance matters.

12.16 Data Protection and Confidentiality

Grant-related information shall be managed in accordance with the ILA Data Protection and Privacy Policy.

ILA shall ensure:

a. Lawful processing of personal data;

b. Secure storage of records;

c. Restricted access to sensitive information;

d. Confidentiality of beneficiary information;

e. Appropriate information sharing practices.

Data breaches shall be reported and managed through established incident response procedures.

12.17 Security Risk Management

ILA shall undertake security assessments for grant activities where necessary.

Security management may include:

a. Field security plans;

b. Travel authorization procedures;

c. Emergency communication systems;

d. Incident reporting;

e. Business continuity arrangements;

f. Evacuation procedures.

Staff shall comply with all organizational security requirements.

12.18 Incident Reporting and Investigation

Grant-related incidents shall be reported promptly through established reporting channels.

Reportable incidents may include:

a. Fraud or corruption;

b. Safeguarding concerns;

c. Financial irregularities;

d. Security incidents;

e. Procurement violations;

f. Data breaches;

g. Significant operational disruptions.

Where appropriate, investigations shall be conducted impartially, confidentially, and in accordance with due process.

12.19 Corrective and Preventive Actions

Where risks or compliance failures are identified, ILA shall implement corrective and preventive actions.

Actions may include:

a. Policy revisions;

b. Staff training;

c. Strengthened controls;

d. Disciplinary measures;

e. Recovery of funds;

f. Enhanced monitoring;

g. Process improvements.

Implementation of corrective actions shall be monitored until completion.

12.20 Business Continuity and Contingency Planning

ILA shall maintain contingency measures to ensure continuity of grant implementation during emergencies.

Plans may address:

a. Security incidents;

b. Natural disasters;

c. Public health emergencies;

d. Technology failures;

e. Funding disruptions;

f. Operational interruptions.

Programme continuity arrangements shall be reviewed periodically.

12.21 Risk Reporting

Significant grant risks shall be reported to Management and, where appropriate, the Board of Directors.

Risk reports shall include:

a. Emerging risks;

b. Changes in risk levels;

c. Mitigation measures implemented;

d. Unresolved high-risk issues;

e. Recommendations for management action.

Where required, material risks shall also be disclosed to donors in accordance with grant agreements.

12.22 Roles and Responsibilities

Board of Directors

Shall provide strategic oversight of grant risk management and organizational compliance.

Executive Director

Shall ensure effective implementation of the grant risk management framework.

Grants Management Function

Shall coordinate grant compliance and monitor implementation of donor requirements.

Finance Department

Shall oversee financial controls and financial compliance.

Programme Department

Shall identify and manage operational risks during implementation.

Human Resource Department

Shall oversee compliance with employment and personnel requirements.

MEAL Department

Shall support monitoring, performance reviews, and risk-informed decision-making.

Legal and Compliance Function

Shall provide legal advice, contract review, and compliance guidance.

All Staff and Partners

Shall identify, report, and manage risks within their areas of responsibility and comply with organizational policies and grant obligations.

12.23 Continuous Improvement

ILA shall periodically review the effectiveness of its grant risk management and compliance framework.

Reviews shall consider:

a. Audit findings;

b. Donor feedback;

c. Lessons learned;

d. Incident reports;

e. Changes in legal or donor requirements;

f. Organizational performance.

Recommendations arising from reviews shall be incorporated into policy updates, procedures, and capacity-building initiatives.

CHAPTER THIRTEEN

GRANT AUDIT, OVERSIGHT, ACCOUNTABILITY AND ASSURANCE

13.1 Introduction

The Initiative for Legal Aid (ILA) recognizes that effective oversight, audit, accountability, and assurance are fundamental to maintaining donor confidence, safeguarding grant resources, ensuring compliance with grant agreements, and achieving organizational excellence. Robust oversight mechanisms promote transparency, strengthen internal controls, detect weaknesses, and support continuous improvement throughout the grant lifecycle.

ILA shall establish an integrated assurance framework to provide reasonable confidence that grant resources are managed efficiently, effectively, ethically, and in compliance with applicable laws, donor requirements, and organizational policies.

This Chapter establishes the framework governing internal oversight, audits, compliance reviews, investigations, accountability mechanisms, management responses, and organizational assurance relating to grant-funded programmes.

13.2 Objectives

The objectives of this Chapter are to:

a. Strengthen accountability for grant resources;

b. Ensure compliance with grant agreements and donor requirements;

c. Promote transparency and responsible stewardship of funds;

d. Assess the effectiveness of internal controls and governance systems;

e. Detect and address financial irregularities, fraud, and non-compliance;

f. Improve programme performance through independent review and assurance; and

g. Support organizational learning and continuous improvement.

13.3 Guiding Principles

Grant audit and oversight shall be guided by the following principles:

a) Independence

Audit and assurance activities shall be conducted objectively and independently.

b) Integrity

All audit processes shall be undertaken honestly, professionally, and ethically.

c) Accountability

Managers and staff shall be accountable for implementing audit recommendations and corrective actions.

d) Transparency

Audit findings and management responses shall be appropriately documented and communicated.

e) Confidentiality

Sensitive information obtained during oversight activities shall be protected and disclosed only to authorized persons.

f) Continuous Improvement

Audit findings shall be used to strengthen governance, controls, and programme effectiveness.

13.4 Grant Oversight Framework

ILA shall maintain an oversight framework comprising:

a. Board oversight;

b. Executive management oversight;

c. Programme supervision;

d. Financial oversight;

e. Internal compliance reviews;

f. Internal audits where applicable;

g. External audits;

h. Donor reviews and verification missions;

i. Independent evaluations.

These mechanisms shall collectively provide assurance over the management of grant-funded activities.

13.5 Roles and Responsibilities

Board of Directors

The Board shall:

a. Provide strategic oversight of grant governance;

b. Review significant audit findings;

c. Monitor implementation of corrective actions;

d. Oversee organizational accountability.

Executive Director

The Executive Director shall:

a. Ensure implementation of effective oversight systems;

b. Support audit activities;

c. Implement Board directives;

d. Ensure corrective actions are completed.

Finance Department

The Finance Department shall:

a. Maintain accurate financial records;

b. Facilitate financial audits;

c. Implement financial recommendations;

d. Strengthen financial controls.

Programme Department

The Programme Department shall:

a. Support programme reviews;

b. Provide implementation documentation;

c. Implement programme-related recommendations.

Grants Management Function

The Grants Management Function shall:

a. Coordinate donor compliance;

b. Monitor grant obligations;

c. Maintain grant documentation;

d. Support assurance activities.

MEAL Department

The MEAL Department shall:

a. Verify programme performance data;

b. Support evaluations;

c. Monitor implementation of performance recommendations.

All Staff and Partners

All personnel shall cooperate fully with audit and oversight processes and provide accurate, complete, and timely information.

13.6 Internal Oversight

ILA shall maintain ongoing management oversight throughout grant implementation.

Internal oversight shall include:

a. Supervisory reviews;

b. Management meetings;

c. Financial monitoring;

d. Programme monitoring;

e. Procurement reviews;

f. Risk management reviews;

g. Compliance monitoring.

Oversight activities shall be documented and periodically evaluated.

13.7 Internal Compliance Reviews

ILA shall conduct periodic compliance reviews to assess adherence to:

a. Donor agreements;

b. Grant implementation plans;

c. Financial procedures;

d. Procurement requirements;

e. Safeguarding obligations;

f. Data protection requirements;

g. Organizational policies.

Compliance review findings shall be documented and communicated to responsible managers.

13.8 Internal Audit

Where an Internal Audit Function exists or is commissioned, it shall independently examine grant management systems to assess:

a. Adequacy of internal controls;

b. Effectiveness of risk management;

c. Compliance with policies and procedures;

d. Financial integrity;

e. Operational efficiency;

f. Governance effectiveness.

Internal audit reports shall include findings, recommendations, and management responses.

13.9 External Audit

Grant-funded programmes may be subject to external audits conducted by independent auditors.

External audits shall assess:

a. Financial statements;

b. Grant expenditure;

c. Internal controls;

d. Procurement compliance;

e. Supporting documentation;

f. Compliance with donor requirements.

ILA shall provide auditors with unrestricted access to relevant records, personnel, and facilities, subject to legal and confidentiality requirements.

13.10 Donor Audits and Verification

Donors may conduct audits, reviews, verification exercises, or monitoring missions in accordance with grant agreements.

ILA shall:

a. Cooperate fully with donor representatives;

b. Provide requested documentation;

c. Facilitate access to project sites where appropriate;

d. Respond promptly to audit findings;

e. Implement agreed corrective actions.

13.11 Financial Accountability

ILA shall maintain financial accountability through:

a. Accurate accounting records;

b. Budget monitoring;

c. Bank reconciliations;

d. Expenditure verification;

e. Segregation of duties;

f. Supporting documentation;

g. Financial reporting.

Financial accountability shall be reviewed throughout the grant lifecycle.

13.12 Programme Accountability

Programme accountability shall ensure that:

a. Approved activities are implemented;

b. Intended beneficiaries are reached;

c. Programme objectives are achieved;

d. Implementation challenges are addressed;

e. Resources are used efficiently.

Programme accountability shall be supported through monitoring, evaluations, and periodic performance reviews.

13.13 Asset Accountability

ILA shall maintain accountability for all grant-funded assets.

Asset accountability shall include:

a. Asset registration;

b. Physical verification;

c. Maintenance records;

d. Assignment records;

e. Secure custody;

f. Disposal documentation.

Assets shall be periodically verified against the asset register.

13.14 Investigation of Irregularities

Where suspected fraud, corruption, financial irregularities, procurement violations, safeguarding concerns, or other serious misconduct are identified, ILA shall initiate appropriate investigations.

Investigations shall be:

a. Impartial;

b. Confidential;

c. Timely;

d. Properly documented;

e. Conducted in accordance with applicable policies.

Investigations may involve internal personnel or external experts where necessary.

13.15 Audit Findings and Recommendations

Audit findings shall be classified according to their significance and associated risk.

Recommendations shall:

a. Identify required corrective actions;

b. Assign responsible officers;

c. Establish implementation timelines;

d. Indicate priority levels.

Management shall review all findings and prepare formal responses.

13.16 Management Action Plans

Following audits or reviews, management shall prepare action plans addressing identified findings.

Action plans shall include:

a. Corrective measures;

b. Responsible departments;

c. Implementation timelines;

d. Monitoring arrangements;

e. Completion indicators.

Progress shall be monitored until all agreed actions are completed.

13.17 Follow-Up Reviews

ILA shall conduct follow-up reviews to assess implementation of audit recommendations.

Follow-up activities shall determine whether:

a. Corrective actions have been implemented;

b. Risks have been reduced;

c. Weaknesses have been addressed;

d. Additional action is required.

Outstanding recommendations shall be reported to senior management and the Board where appropriate.

13.18 Accountability to Donors

ILA shall remain accountable to donors through:

a. Timely reporting;

b. Transparent financial management;

c. Implementation of grant obligations;

d. Cooperation during audits;

e. Prompt communication regarding significant issues.

Material issues affecting grant implementation shall be communicated in accordance with donor agreements.

13.19 Accountability to Beneficiaries and Stakeholders

ILA recognizes its accountability to beneficiaries, communities, partners, and other stakeholders.

The Organization shall:

a. Provide accessible feedback mechanisms;

b. Respond to complaints appropriately;

c. Protect beneficiary rights and dignity;

d. Communicate programme information transparently where appropriate;

e. Incorporate stakeholder feedback into programme improvement.

13.20 Records for Audit and Assurance

ILA shall maintain comprehensive grant records to support oversight and audit activities.

Records shall include:

a. Grant agreements;

b. Budgets;

c. Procurement documentation;

d. Financial records;

e. Programme reports;

f. Monitoring records;

g. Audit reports;

h. Correspondence;

i. Management action plans.

Records shall be retained in accordance with applicable legal, donor, and organizational requirements.

13.21 Quality Assurance

ILA shall establish quality assurance processes to strengthen grant management.

Quality assurance activities may include:

a. Peer reviews;

b. Technical reviews;

c. Compliance assessments;

d. Document verification;

e. Management reviews;

f. Performance benchmarking.

Quality assurance findings shall inform organizational improvements.

13.22 Lessons Learned and Organizational Improvement

Audit findings, evaluations, compliance reviews, and oversight activities shall be used to strengthen future grant management.

ILA shall:

a. Document lessons learned;

b. Revise procedures where necessary;

c. Improve internal controls;

d. Strengthen staff capacity;

e. Promote organizational learning.

13.23 Responsibilities

Board of Directors

Provides strategic oversight of accountability and assurance.

Executive Director

Ensures implementation of oversight mechanisms and corrective actions.

Finance Department

Maintains financial integrity and facilitates audits.

Programme Department

Ensures programme accountability and implementation of recommendations.

Grants Management Function

Coordinates grant assurance processes and donor compliance.

MEAL Department

Supports programme verification and evidence-based accountability.

Internal Audit Function (where established)

Provides independent assurance on governance, risk management, and internal controls.

All Staff and Partners

Cooperate with audits, provide accurate information, and implement assigned corrective actions.

13.24 Continuous Improvement

ILA shall periodically review its audit, oversight, and assurance systems to ensure they remain effective, proportionate, and aligned with evolving donor expectations, legal requirements, and organizational needs.

Findings from these reviews shall inform updates to policies, procedures, training programmes, and institutional governance practices.

CHAPTER FOURTEEN

GRANT CLOSURE, SUSTAINABILITY AND POST-GRANT MANAGEMENT

14.1 Introduction

The Initiative for Legal Aid (ILA) recognizes that effective grant management extends beyond the completion of funded activities. Proper grant closure ensures that all contractual, financial, operational, and reporting obligations are fulfilled, while sustainability planning promotes the continuation of programme benefits after donor funding has ended.

Grant closure is a structured process that confirms that programme objectives have been achieved, grant resources have been properly accounted for, assets have been appropriately managed, contractual obligations have been fulfilled, and institutional learning has been documented.

This Chapter establishes the framework governing grant closure, project sustainability, post-grant responsibilities, knowledge management, and long-term stewardship of programme outcomes.

14.2 Objectives

The objectives of this Chapter are to:

a. Ensure orderly and compliant closure of grants;

b. Fulfil all donor, legal, financial, and contractual obligations;

c. Account for all grant resources and assets;

d. Preserve programme knowledge and institutional learning;

e. Promote sustainability of project outcomes;

f. Strengthen future grant management through lessons learned; and

g. Maintain positive relationships with donors, partners, beneficiaries, and stakeholders.

14.3 Guiding Principles

Grant closure and sustainability shall be guided by the following principles:

a) Accountability

ILA shall remain accountable for all grant resources until closure is completed.

b) Compliance

All closure activities shall comply with grant agreements, donor requirements, and organizational policies.

c) Transparency

Grant closure decisions and documentation shall be complete, accurate, and properly recorded.

d) Sustainability

Programme benefits shall be maintained, where feasible, beyond the grant period.

e) Learning

Experiences from completed grants shall inform future programming and organizational development.

f) Responsible Stewardship

Assets, records, partnerships, and knowledge generated through grants shall be responsibly managed after project completion.

14.4 Grant Closure Planning

Grant closure planning shall commence sufficiently in advance of the grant end date, normally no later than three (3) months before project completion or earlier where required by the donor.

The closure plan shall identify:

a. Remaining activities;

b. Reporting deadlines;

c. Financial reconciliation requirements;

d. Procurement completion;

e. Asset management actions;

f. Staffing transition arrangements;

g. Partner close-out activities;

h. Documentation requirements;

i. Sustainability measures.

The Grants Management Function shall coordinate the preparation and monitoring of the grant closure plan.

14.5 Grant Closure Checklist

ILA shall prepare a Grant Closure Checklist for every grant to ensure completion of all required actions.

The checklist shall include:

a. Completion of programme activities;

b. Submission of narrative reports;

c. Submission of financial reports;

d. Reconciliation of accounts;

e. Liquidation of advances;

f. Closure of procurement actions;

g. Asset verification and disposition;

h. Staff exit and contract completion;

i. Partner close-out;

j. Donor approvals where required;

k. Archiving of grant records;

l. Documentation of lessons learned.

Completion of the checklist shall be approved by the Executive Director or delegated authority.

14.6 Completion of Programme Activities

Programme Managers shall confirm that:

a. Approved activities have been completed;

b. Outputs and deliverables have been achieved;

c. Outstanding obligations have been addressed;

d. Beneficiary commitments have been fulfilled;

e. Implementation records are complete.

Where activities remain incomplete, ILA shall seek donor guidance or approval where required.

14.7 Final Financial Reconciliation

The Finance Department shall conduct a comprehensive financial reconciliation before grant closure.

The reconciliation shall include:

a. Verification of all expenditures;

b. Confirmation of budget utilization;

c. Reconciliation of bank accounts;

d. Clearance of outstanding advances;

e. Settlement of liabilities;

f. Confirmation of unspent balances;

g. Preparation of final financial statements.

Any unspent funds shall be managed in accordance with donor agreements.

14.8 Final Narrative and Financial Reports

ILA shall prepare and submit all final reports within the timelines specified in the grant agreement.

Final reports shall include:

Programme Report

a. Objectives achieved;

b. Activities implemented;

c. Outputs and outcomes;

d. Beneficiary reach;

e. Challenges encountered;

f. Lessons learned;

g. Sustainability measures.

Financial Report

a. Expenditure summary;

b. Budget analysis;

c. Variance explanations;

d. Supporting schedules;

e. Certification where required.

All reports shall undergo internal review and approval before submission.

14.9 Asset Management at Grant Closure

The Procurement and Assets Management Unit shall verify all grant-funded assets before grant closure.

Asset close-out activities shall include:

a. Physical verification;

b. Update of the asset register;

c. Assessment of asset condition;

d. Confirmation of ownership;

e. Determination of donor disposition requirements;

f. Transfer, retention, donation, or disposal of assets in accordance with donor agreements and ILA policies.

No grant-funded asset shall be disposed of without the required approvals.

14.10 Closure of Procurement and Contracts

Before grant closure, ILA shall ensure that:

a. All procurement activities have been completed;

b. Supplier contracts have been fulfilled or formally closed;

c. Outstanding invoices have been settled;

d. Procurement documentation is complete;

e. Contractual disputes have been resolved or appropriately documented.

14.11 Human Resource Transition

Grant closure shall include responsible management of grant-funded personnel.

The Human Resource Department shall ensure:

a. Timely communication regarding contract completion;

b. Completion of staff exit procedures;

c. Settlement of lawful employment obligations;

d. Recovery of organizational assets;

e. Handover of responsibilities;

f. Documentation of institutional knowledge.

Where possible, staff may be redeployed to other programmes subject to organizational needs and available funding.

14.12 Partner and Sub-Grant Close-Out

Where implementation involved partners or sub-grantees, ILA shall ensure:

a. Completion of agreed activities;

b. Submission of final reports;

c. Financial reconciliation;

d. Verification of assets;

e. Closure of outstanding obligations;

f. Completion of partner evaluations.

Final payments shall only be made after satisfactory fulfilment of contractual obligations.

14.13 Donor Close-Out Requirements

ILA shall comply with all donor-specific close-out requirements.

These may include:

a. Submission of completion reports;

b. Final financial certification;

c. Inventory reports;

d. Audit reports;

e. Disposition of assets;

f. Return of unspent funds;

g. Close-out meetings.

The Grants Management Function shall coordinate compliance with donor requirements.

14.14 Knowledge Management and Lessons Learned

ILA shall document lessons learned from every significant grant.

Lessons learned shall consider:

a. Programme design;

b. Implementation approaches;

c. Financial management;

d. Partnerships;

e. Procurement;

f. Risk management;

g. Innovation;

h. Beneficiary engagement;

i. Donor relations.

The documented lessons shall be shared internally to improve future grant management.

14.15 Sustainability Planning

ILA shall integrate sustainability planning throughout the grant lifecycle and finalize sustainability measures before project closure.

Sustainability planning may include:

a. Strengthening community ownership;

b. Institutional capacity development;

c. Integration of activities into existing programmes;

d. Policy advocacy;

e. Continued stakeholder engagement;

f. Resource mobilization for follow-on funding;

g. Maintenance of grant-funded assets;

h. Knowledge transfer to local institutions.

14.16 Post-Grant Monitoring

Where appropriate, ILA may undertake post-grant monitoring to assess the sustainability of project outcomes.

Post-grant monitoring may examine:

a. Continued use of project outputs;

b. Maintenance of infrastructure or assets;

c. Institutional capacity retained by partners;

d. Continued benefits to beneficiaries;

e. Sustainability of programme outcomes.

Findings shall inform future programme design and fundraising strategies.

14.17 Record Retention and Archiving

Upon closure, all grant records shall be archived in accordance with the ILA Records Management procedures and donor requirements.

Archived records shall include:

a. Grant agreements;

b. Proposals;

c. Budgets;

d. Financial records;

e. Procurement documentation;

f. Monitoring reports;

g. Evaluation reports;

h. Audit reports;

i. Correspondence;

j. Closure documentation.

Records shall be retained for the period required by law, donor agreements, and organizational policy.

14.18 Final Grant Evaluation

Where required by the donor or determined by ILA, a final evaluation shall be conducted to assess:

a. Achievement of objectives;

b. Effectiveness;

c. Efficiency;

d. Impact;

e. Sustainability;

f. Relevance;

g. Value for money.

Recommendations shall be incorporated into future programme planning and organizational learning.

14.19 Post-Grant Donor Engagement

Following grant closure, ILA shall maintain constructive relationships with donors through:

a. Communication of programme impact;

b. Sharing of lessons learned;

c. Participation in donor learning events;

d. Exploration of future collaboration opportunities;

e. Responsible stewardship of donor-funded assets and achievements.

Post-grant engagement shall support long-term strategic partnerships while maintaining transparency and professional integrity.

14.20 Roles and Responsibilities

Board of Directors

Shall provide oversight of significant grant closures and ensure organizational accountability.

Executive Director

Shall approve grant closure, oversee sustainability planning, and ensure completion of outstanding obligations.

Grants Management Function

Shall coordinate the overall grant close-out process and monitor compliance with donor requirements.

Finance Department

Shall conduct financial reconciliation, prepare final financial reports, and manage the return of unspent funds where required.

Programme Department

Shall complete programme activities, prepare final narrative reports, and document lessons learned.

Procurement and Assets Management Unit

Shall manage asset verification, disposition, and procurement close-out.

Human Resource Department

Shall manage staff transition and completion of employment obligations.

MEAL Department

Shall support final evaluations, sustainability assessments, and documentation of project outcomes.

Legal and Compliance Function

Shall advise on contractual obligations, legal close-out requirements, and record retention.

14.21 Continuous Improvement

ILA shall periodically review grant closure practices to improve organizational effectiveness and donor compliance.

The review shall consider:

a. Audit findings;

b. Donor feedback;

c. Post-project evaluations;

d. Lessons learned;

e. Emerging good practices in grant management.

Recommendations shall inform revisions to this Policy and related organizational procedures.

CHAPTER FIFTEEN

POLICY IMPLEMENTATION, REVIEW AND GOVERNANCE

15.1 Introduction

The effective implementation of this Grant Management Policy is fundamental to ensuring that the Initiative for Legal Aid (ILA) manages grants in a transparent, accountable, efficient, and legally compliant manner. This Policy shall provide a consistent institutional framework for the planning, acquisition, implementation, monitoring, reporting, and closure of all grants administered by ILA.

Successful implementation requires commitment from the Board of Directors, Management, employees, volunteers, consultants, implementing partners, and other stakeholders. This Chapter establishes the governance arrangements, implementation responsibilities, compliance mechanisms, policy review processes, and institutional accountability measures necessary to ensure the effective application of this Policy.

15.2 Policy Objectives

The objectives of this Chapter are to:

a. Establish a clear framework for implementing this Policy;

b. Define institutional governance and accountability arrangements;

c. Ensure consistent application of grant management standards across the Organization;

d. Promote compliance with donor requirements, legal obligations, and organizational policies;

e. Provide mechanisms for policy monitoring, review, and continuous improvement; and

f. Strengthen institutional capacity for effective grant management.

15.3 Scope of Implementation

This Policy shall apply to:

a. All grants received, managed, or administered by ILA;

b. All departments, units, and offices of ILA;

c. All employees, Board members, volunteers, interns, consultants, contractors, and temporary personnel involved in grant management;

d. Implementing partners, sub-grantees, and service providers where applicable;

e. All grant-funded projects, programmes, and activities regardless of funding source or value.

Compliance with this Policy shall be a condition of participation in grant-funded activities.

15.4 Institutional Governance Framework

Grant management shall be governed through a clearly defined institutional structure that promotes accountability and effective oversight.

Board of Directors

The Board shall:

a. Approve the Grant Management Policy and major amendments;

b. Provide strategic oversight of grant management;

c. Oversee institutional accountability and governance;

d. Monitor organizational compliance through periodic reports;

e. Support resource mobilization and sustainability initiatives.

Executive Director

The Executive Director shall:

a. Ensure implementation of this Policy;

b. Provide executive leadership for grant management;

c. Approve operational procedures;

d. Allocate institutional resources;

e. Report significant grant matters to the Board.

Senior Management Team

Senior Management shall:

a. Coordinate cross-departmental implementation;

b. Monitor grant performance;

c. Review institutional risks;

d. Resolve implementation challenges;

e. Strengthen organizational capacity.

15.5 Departmental Responsibilities

Implementation of this Policy shall involve coordinated responsibilities across the Organization.

Grants Management Function

Responsible for:

a. Coordinating grant management processes;

b. Maintaining grant records;

c. Monitoring donor compliance;

d. Coordinating reporting obligations;

e. Supporting proposal development.

Programme Department

Responsible for:

a. Programme implementation;

b. Activity planning;

c. Technical supervision;

d. Beneficiary engagement;

e. Narrative reporting.

Finance Department

Responsible for:

a. Budgeting;

b. Financial management;

c. Accounting;

d. Financial reporting;

e. Financial compliance.

Procurement and Assets Management Unit

Responsible for:

a. Grant procurement;

b. Asset management;

c. Supplier management;

d. Procurement compliance.

Human Resource Department

Responsible for:

a. Recruitment;

b. Personnel administration;

c. Payroll management;

d. Staff capacity development.

MEAL Department

Responsible for:

a. Monitoring and evaluation;

b. Performance measurement;

c. Accountability systems;

d. Organizational learning.

Legal and Compliance Function

Responsible for:

a. Legal review of agreements;

b. Compliance monitoring;

c. Policy interpretation;

d. Regulatory guidance.

15.6 Responsibilities of Employees

Every employee involved in grant-funded activities shall:

a. Understand and comply with this Policy;

b. Perform assigned responsibilities diligently;

c. Maintain accurate records;

d. Protect organizational resources;

e. Report risks, irregularities, and misconduct;

f. Cooperate with audits and reviews;

g. Uphold ethical standards and organizational values.

Failure to comply with this Policy may result in disciplinary action.

15.7 Capacity Building and Training

ILA shall provide ongoing capacity-building programmes to ensure effective implementation of this Policy.

Training may include:

a. Grant management principles;

b. Donor compliance requirements;

c. Financial management;

d. Procurement procedures;

e. Risk management;

f. Safeguarding;

g. Monitoring and evaluation;

h. Data protection;

i. Fraud prevention.

Training needs shall be assessed periodically.

15.8 Communication and Awareness

ILA shall ensure that this Policy is effectively communicated throughout the Organization.

Communication measures may include:

a. Staff orientation;

b. Induction programmes;

c. Management meetings;

d. Policy dissemination;

e. Internal communication platforms;

f. Refresher training sessions.

The latest approved version of this Policy shall be readily accessible to all relevant personnel.

15.9 Policy Compliance

Compliance with this Policy shall be monitored through:

a. Routine management supervision;

b. Compliance reviews;

c. Internal audits;

d. External audits;

e. Donor assessments;

f. Programme monitoring;

g. Performance reviews.

Instances of non-compliance shall be addressed promptly through appropriate corrective measures.

15.10 Monitoring Policy Implementation

Management shall periodically monitor implementation of this Policy to assess:

a. Effectiveness of grant management systems;

b. Compliance with donor requirements;

c. Adequacy of internal controls;

d. Achievement of policy objectives;

e. Institutional capacity needs.

Monitoring findings shall be reported to Senior Management and, where appropriate, the Board of Directors.

15.11 Performance Measurement

ILA shall establish performance indicators to evaluate implementation of this Policy.

Indicators may include:

a. Grant compliance rates;

b. Timely submission of reports;

c. Audit findings;

d. Budget utilization;

e. Project completion rates;

f. Donor satisfaction;

g. Implementation of corrective actions.

Performance results shall support continuous organizational improvement.

15.12 Policy Exceptions

Exceptions to this Policy may only be permitted where:

a. Required by law;

b. Required by donor agreements;

c. Approved by the Executive Director or the Board where appropriate;

d. Adequately documented and justified.

Approved exceptions shall not compromise accountability, transparency, or organizational integrity.

15.13 Policy Interpretation

Questions regarding interpretation of this Policy shall be referred to the Legal and Compliance Function in consultation with the Executive Director.

Where uncertainty exists, interpretations shall:

a. Be consistent with applicable laws;

b. Align with donor requirements;

c. Uphold organizational values;

d. Promote sound grant management practices.

15.14 Policy Review

This Policy shall be reviewed:

a. At least once every three (3) years;

b. Where significant changes occur in applicable laws or regulations;

c. Where donor requirements materially change;

d. Following major organizational restructuring;

e. Following significant audit findings or identified weaknesses.

The review process shall involve relevant departments, management, and the Board of Directors where appropriate.

15.15 Policy Amendment

Amendments to this Policy may be proposed by:

a. The Board of Directors;

b. The Executive Director;

c. Senior Management;

d. The Grants Management Function;

e. The Legal and Compliance Function;

f. The Finance Department.

All proposed amendments shall:

a. Be documented;

b. Undergo stakeholder consultation where appropriate;

c. Receive legal review;

d. Be approved by the Board of Directors before taking effect.

15.16 Version Control

ILA shall maintain a formal version control system for this Policy.

Version control records shall include:

a. Policy version number;

b. Approval date;

c. Effective date;

d. Summary of amendments;

e. Approving authority;

f. Scheduled review date.

Only the latest approved version shall be used for organizational purposes.

15.17 Transitional Arrangements

Where this Policy replaces previous grant management procedures, Management shall ensure an orderly transition.

Transition measures may include:

a. Staff orientation;

b. Revision of operational procedures;

c. Updating templates and manuals;

d. Migration of grant records;

e. Alignment of ongoing grants, where feasible and consistent with donor agreements.

15.18 Approval and Effective Date

This Grant Management Policy shall become effective upon approval by the Board of Directors of the Initiative for Legal Aid (ILA).

Unless otherwise specified by the Board, this Policy shall apply to all new grants from the effective date and, where practicable, to ongoing grants.

15.19 Authority

This Policy is issued under the authority of the Board of Directors of the Initiative for Legal Aid (ILA).

The Executive Director shall be responsible for ensuring its implementation, while all employees, partners, consultants, volunteers, contractors, and sub-grantees shall comply with its provisions.

15.20 Repeal and Savings

Upon the effective date of this Policy:

a. All previous grant management policies, procedures, or guidelines that are inconsistent with this Policy are hereby repealed to the extent of the inconsistency;

b. Ections lawfully taken under previous grant management procedures shall remain valid unless otherwise determined by the Board of Directors;

c. Existing grant agreements shall continue to be governed by their contractual terms, provided that this Policy shall apply to operational matters where it does not conflict with donor requirements.