



## **DONOR COMPLIANCE & GRANT MANAGEMENT POLICY**

---

### **1. PREAMBLE**

The CSOs Engagement Forum (CEF), duly established and governed under its Constitution, recognizes that donor funding is premised on trust, accountability, and strict adherence to agreed terms and conditions. In furtherance of its constitutional mandate and fiduciary obligations, CEF adopts this Donor Compliance & Grant Management Policy to ensure that all grants and donor funds are received, managed, utilized, and reported in a lawful, transparent, and accountable manner.

---

### **2. LEGAL AND CONSTITUTIONAL BASIS**

This Policy is made pursuant to:

- The CEF Constitution provisions on financial accountability, ethical conduct, and institutional governance;
- Applicable national laws and regulations governing non-profit organizations;
- Donor agreements, grant contracts, and international best practices in grant management.

This Policy shall have binding force on all organs, officers, staff, members, and partners of CEF.

---

### **3. PURPOSE OF THE POLICY**

The objectives of this Policy are to:

1. Establish standardized procedures for grant acceptance and management;
  2. Ensure full compliance with donor requirements and contractual obligations;
  3. Promote transparency, accountability, and prudent financial stewardship;
  4. Safeguard donor funds against misuse, diversion, or misrepresentation;
  5. Demonstrate CEF's institutional readiness and professionalism in managing grants.
- 

### **4. SCOPE OF APPLICATION**

This Policy applies to:



- All donor funds, grants, and contributions received by CEF;
- All staff, consultants, volunteers, and members involved in grant implementation;
- Partner organizations implementing activities on behalf of or in collaboration with CEF.

Compliance with this Policy is a condition precedent to participation in any donor-funded activity.

---

## 5. GRANT ACCEPTANCE AND COMPLIANCE PROCEDURES

### 5.1 Grant Acceptance

CEF shall only accept grants that:

- Are consistent with its constitutional mandate, objectives, and values;
- Do not compromise its independence, integrity, or governance structures;
- Have been reviewed and approved by the competent organ as prescribed by the CEF Constitution.

All grant agreements shall be documented in writing and executed by authorized signatories in accordance with the Delegation of Authority provisions under the CEF Constitution.

### 5.2 Compliance Obligations

CEF shall comply fully with:

- Grant agreements and donor conditions;
- Approved budgets, workplans, and timelines;
- Applicable laws, policies, and internal controls.

Non-compliance shall constitute a material breach and may attract disciplinary, contractual, or legal consequences.

---

## 6. RESTRICTIONS ON USE OF FUNDS

Donor funds shall:

- Be used strictly for the purposes approved in the grant agreement;
- Not be diverted, reallocated, or reprogrammed without prior written donor approval;
- Not be used for prohibited activities as defined by the donor or by law.



Any unauthorized use of funds shall be treated as gross misconduct and addressed in accordance with the CEF Constitution and applicable policies.

---

## 7. FINANCIAL MANAGEMENT AND CONTROLS

CEF shall ensure that:

- Separate financial tracking is maintained for each grant where required;
  - Expenditures are supported by verifiable documentation;
  - Payments are approved in line with internal financial controls;
  - Independent audits are conducted where required by donors or law.
- 

## 8. REPORTING TIMELINES AND STANDARDS

### 8.1 Programmatic Reporting

CEF shall submit narrative and performance reports:

- In accordance with donor timelines and formats;
- Demonstrating progress against agreed indicators and outputs;
- Reflecting accurate, verifiable, and evidence-based information.

### 8.2 Financial Reporting

Financial reports shall:

- Be prepared in accordance with donor and generally accepted accounting standards;
- Accurately reflect expenditures incurred;
- Be reviewed and approved by authorized officers prior to submission.

Late, inaccurate, or misleading reporting shall be considered a breach of this Policy.

---

## 9. DONOR VISIBILITY AND ACKNOWLEDGMENT

CEF shall:

- Acknowledge donor support in line with donor visibility guidelines;



- Ensure that branding, communication, and public disclosures are accurate and dignified;
- Refrain from using donor names or logos without authorization.

Visibility arrangements shall not compromise CEF's neutrality, independence, or constitutional mandate.

---

## 10. RECORD-KEEPING AND DOCUMENTATION STANDARDS

CEF shall maintain complete, accurate, and secure records, including:

- Signed grant agreements and amendments;
- Financial records, vouchers, and receipts;
- Narrative reports and correspondence;
- Audit reports and monitoring records.

All grant-related records shall be retained for a minimum period as prescribed by law, donor requirements, or the CEF Constitution, whichever is longer.

---

## 11. OVERSIGHT, MONITORING, AND AUDIT

The Governing Body shall:

- Exercise oversight over donor-funded programs;
- Ensure periodic reviews and compliance assessments;
- Commission internal or external audits as necessary.

Findings from audits or reviews shall be addressed promptly and corrective actions documented.

---

## 12. BREACHES AND SANCTIONS

Any violation of this Policy shall:

- Be investigated in a fair and transparent manner;
- Attract disciplinary action in accordance with the CEF Constitution and HR policies;
- Where applicable, be reported to donors and relevant authorities.



---

### 13. REVIEW AND AMENDMENT

This Policy shall be reviewed periodically to ensure consistency with:

- The CEF Constitution;
- Donor requirements;
- Evolving best practices in grant management.

Amendments shall be approved by the appropriate organ of CEF in accordance with the Constitution.

---

### 14. COMMENCEMENT

This Donor Compliance & Grant Management Policy shall take effect upon approval by the competent authority of CEF and shall remain in force unless amended or repealed in accordance with the CEF Constitution.

---

Approved \_\_\_\_\_ by \_\_\_\_\_ the \_\_\_\_\_ Board: \_\_\_\_\_  
Date: \_\_\_\_\_