



NATIONAL ENVIRONMENT TRUST FUND

PUBLIC COMPLAINTS POLICY AND PROCEDURES

MAY 2019

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PREFACE

Responsiveness to customers forms the bedrock of effective customer service delivery. In the modern era which is heavily influenced by real time communication, organisations that seek to excel in customer service must deliberately put in place mechanisms to constantly monitor customer responses to the services offered.

In Kenya, since 2002 the Government of Kenya has been keen to ensure that the civil service and related Government Agencies offer very high quality of services. Of great importance has been the responsiveness to complaints raised by customers. The push for improvement in customer was further encapsulated in the Constitution of Kenya 2010 which gave rise to the Commission on Administrative Justice (CAJ) or 'Ombudsman' charged with the responsibility of overseeing customer complaints among other issues.

The NETFUND public complaints policy and procedures have been developed to comply with the requirements of the CAJ. However, NETFUND will not only use this tool for compliance but to embed a customer centric culture in the organisation. This is one area that the organisation will seek to excel in.

Samson Toniok

Ag. Chief Executive Officer

1 Preamble

NETFUND Public Complaints Policy was developed in compliance with the Commission on Administrative Justice (CAJ) or 'Ombudsman' guidelines for State-owned and private institutions, to set up mechanisms to address public complaints.

CAJ is mandated to investigate allegations of misuse of office, corruption, and unethical conduct, breach of integrity, maladministration, delay, injustice, discourtesy, inattention, incompetence, misbehaviour, and inefficiency or ineptitude. It is also mandated to receive, register, sort, classify and document all complaints against public officers in Ministries, State Corporations, Statutory Bodies and other public institutions.

A Public Complaints monitoring system in State-owned institutions as a new indicator in the performance contracting.

NETFUND Public Complaints Management Procedures (**Annex I**) contain step-by-step guidelines on the implementation of this Policy.

2 Policy statement

NETFUND shall establish a committee to handle and address Public Complaints made against the institution.

The committee shall be called the NETFUND Public Complaints Committee (PCC).

3 Definitions

Complaint: A complaint means an expression of dissatisfaction by a customer or potential customer about service delivery by the members of staff of the institution or about any policy of the Institution, expressed through oral, written or any other communication mode.

Complainant: A person or institution alleging breach of any matter under the mandate of NETFUND.

Resolved: This is a situation whereby NETFUND has provided sufficient information, a remedy or a solution, to the satisfaction of the complainant, or where the complainant remains dissatisfied, but public complaints committee of NETFUND has taken the complainant through due process and made a just decision.

On-going: This is a situation whereby a complaint resolution process has commenced but has not been finalized.

New: This is a situation whereby a complaint has been received less than two weeks to the reporting period and no action has been initiated on it.

Complaint issue: This is the subject issue of the complaint, such as delay, inefficiency, abuse of office among others.

Complaints Handling Procedures: This refers to the steps a complaint goes through NETFUND from receipt to the day it is actually resolved.

Public Complaints Desk: The desk in NETFUND dedicated to handling all complaints with regard the institution's service delivery.

4 Role of the PCC

The PCC mandate shall be:

- 4.1 Develop mechanisms of addressing Public Complaints made against NETFUND.
- 4.2 Ensure that the NETFUND delivers its services as spelled out in its service charter.
- 4.3 Provide an alternative avenue to stakeholders to channel their complaints on unsatisfactory service-delivery or wrongdoings in the activities of NETFUND.

- 4.4 Review the complaints register, ascertain whether, there is merit in each complaint; and ensure all complaints against NETFUND are well documented and addressed.
- 4.5 Inquire into allegations of misuse of office, unethical conduct, breach of integrity, maladministration, delay, injustice, discourtesy, inattention, misbehaviour, inefficiency, ineptitude or any other complaints.
- 4.6 Oversee, co-ordinate, monitor and follow up specific action on channeled complaints.
- 4.7 Promote alternative dispute resolution through mediation or frontline resolution.
- 4.8 To publish quarterly reports on the number and nature of complaints received and the action taken by the committee.
- 4.9 To apply for and obtain a certificate of compliance from the Commission on Administrative Justice on behalf of NETFUND.
- 4.10 A Complaint shall be outside the PCC mandate if:
 - 4.10.1 It is not against NETFUND or its personnel;
 - 4.10.2 It concerns the Courts in exercise of their Judicial role or parliament in exercise of its Legislative role or NETFUND Human Resources Committee in exercise of its disciplinary mandates and;
 - 4.10.3 It does not concern possible wrongdoing by the NETFUND.

Admissibility of Complaints

- 4.11 A Complaint that is within the roles stated in section (4) shall be subjected to further criteria for it to be admissible before the PCC can initiate inquiries.
- 4.12 The additional criterion shall be:

4.12.1 That the Complainant must be identified. Where the complaint is anonymous and NETFUND cannot identify the person making the complaint, action may be taken to resolve it, as long as all of the necessary information for a decision to take further must be clearly available.

5 Anonymous complaints

Anyone make an anonymous complaint should be aware that NETFUND:

- 5.1 May hand the complaint(s) over to the police or other authorities for their views or with a request to investigate the allegations further if deemed appropriate;
- 5.2 Will provide the person(s) accused or implicated in the alleged wrongdoing with copies of the allegation(s);
- 5.3 Is obliged to support employee(s) named in anonymous allegations until such a time as there may be sufficient evidence to justify any action against them.
- 5.4 That the Complaint has been lodged with appropriate channels used by NETFUND;
- 5.5 That appropriate administrative intervention channels have been exhausted before approaching the PCC;
- 5.6 That the Complaint must not be under adjudication by a court of law or question the merits of a court's ruling;
- 5.7 That the Complaint must not be under the adjudication by the Disciplinary Committee of the NETFUND or question the merits of its ruling, and
- 5.8 That the Complaint must not involve employment disputes between NETFUND and its staff.

6 Complaints and Inquiries

The public complaints office shall be under the office of the CEO.

The CEO shall:

- 6.1 Oversee the implementation of the decisions of the committee, and
- 6.2 Ensure the protection of tenure of office of the PCC members.
- 6.3 The PCC shall be an avenue of last resort in NETFUND, hence the
 - 6.3.1 Complainant is encouraged to make every effort to exhaustively resolve the complaint at the concerned department or section first.
 - 6.3.2 If the Complainant is not satisfied with their response or there is undue delay in dealing with the Complaint, then the Complainant shall make his/her/its complaint to PCC.

The Complaints shall be made by the Complainant in any one of the following ways:

- 6.4 Online (NETFUND website)
- 6.5 In person at the NETFUND PCC office;
- 6.6 In writing, or
- 6.7 By telephone
- 6.8 By e-mail – complaints@netfund.go.ke
- 6.9 Enquiries shall be made during working hours only from 8:00 am – 5:00 pm (GMT + 3) from Monday to Friday or call us on +254-20-2369563, +254-202213581

6.7 The complaints shall be send through the following postal and e-mail address:

- 1. Send by registered mail to:

The Chair
Public Complaints Committee,
Office of the CEO,
NETFUND,
P.O Box 19324-00202 Nairobi Kenya

2. Send an e-mail to complaints@netfund.go.ke

6.8 The Complainant shall include the following information in his/her Complaint:

1. Complainant name, address and telephone number;
2. A concise summary of the Complaint – who was involved, what, when and where it happened; why the situation is unfair or wrong;
3. What the complainant has done to try and resolve the Complaint and the result;
4. Copies of relevant documents;
5. The result the Complainant is seeking.

6.9 NETFUND shall organize training/capacity building workshops for complaints-handling officers and staff.

6.10 The PCC members shall create awareness among its stakeholders on the existence of its complaints handling system by using all the possible communication channels.

6.11 The mandate of the PCC shall not interfere in anyway with any Complaints redress mechanisms as provided for in NETFUND service charter.

7 Complaints Management

7.1 All complaints received by the PCC shall be registered, documented and acknowledged.

7.2 The PCC members shall be well versed with the organisational procedures to be able to handle and resolve the complaints competently.

7.3 The PCC secretariat shall receive and document all the complaints submitted to it on a register, (**Annex 2**) and acknowledge receipt of the complaint within three (3) calendar days.

7.4 The Complaints shall be sorted out, classified and assessed in light of the PCC mandates to determine if an inquiry should be opened.

7.5 If the complainant has not first sought a solution from the concerned office within the organisation, he/she/it shall be advised by the PCC to seek redress from the relevant office.

7.6 The flow of the Public Complaints Management is summarized in the Block diagram given in **Annex 1**.

7.7 The frontline resolution shall apply to complaint issues that are straightforward and easily resolved (low profile), requiring little or no investigation. This may take the form of a quick apology or explanation or other action to resolve the complaint quickly, in five (5) calendar days or less, unless there is exceptional circumstances.

7.8 Complaints that require investigation are those ones considered complex or high profile, and may raise critical issues requiring direct input from senior management of the organisation. Such complaints require a certain amount of examination to establish the relevant facts before the organisation can state its position. The full response of Complaints requiring investigation shall be given within twenty one (21) calendar days.

7.9 The principle of fairness dictates that the PCC's decision on a Complaint must not take into account information provided by either the Complainant or by the Organisation, unless the other party has had the opportunity to see information and give his/her/its point of view.

7.10 The complainant shall furnish the PCC with supporting evidence(s), which in turn is send to the concerned organisation office or officer for a first opinion within seven (7) calendar days of receptions for their opinion. In a similar way, the PCC may remit the opinion of the Organisation to the Complainant with an invitation to submit comments and observations.

7.11 When the opinion is received, the PCC shall take decision depending on the response received and sent to the Complainant for his/her/it comments.

7.12 If the response shall be delayed, the Complainant shall be told and given a revised timescale for bringing the investigation to a conclusion.

7.13 In some instances, the Organisation may take positive steps to settle the Complaint to the satisfaction of the Complainant. If this happens, the Complaint shall be closed as "settled by the Organisation".

7.14 If, on other cases, the Complainant decides to withdraw the Complaint, then the Complaint shall be closed for this reason.

7.15 If the Complaint is neither settled by the Organisation nor withdrawn by the Complainant, the PCC initiates further inquiries. If the inquiries reveal

no instances of wrong doing, the Complainant and the Organisation shall be informed accordingly and the Complaint is closed.

7.16 A thorough investigation leading to a full and objective response to the Complaint made and endorsed by the Organisation senior management, shall be taken as a final and definitive position established by PCC.

7.17 Should the Complainant remain dissatisfied, the PCC shall advise the Complainant to lodge his/her/its Complaint with the CAJ for redress.

7.18 The PCC shall keep accurate records of its investigation and of any interviews or meetings held to discuss the Complaint and may avail it to CAJ if requested.

7.19 The PCC shall submit quarterly report to the CAJ on the number of Complaints received, actual resolution or action taken on the prescribed format for the financial year. **(Annex 3)**.

7.20 Complaints details, outcome and action taken shall be recorded and used for service improvement by the NETFUND.

8 Complaints-Handling Procedure

8.1 The Complaint shall be made on the prescribed Complaint Form (Annex 4).

8.2 The Complaints-Handling procedure shall be:

- a) A complaint may be received either by telephone, e-mail, a letter or in person filed through the NETFUND Complaints Form.
- b) Once a complaint is received, it shall be recorded by the Desk and accorded a case reference number to facilitate follow-up. A record of a complaint shall include the name and contact details of the

customer, full details of the complaint including the date, as well as details of all communication with the customer and any actions to resolve the complaint.

- c) The Committee shall immediately acknowledge receipt of a complaint within 24 hours and continuously update the Complainant on the status of the resolution process.
- d) The complaint shall then be directed to the appropriate Officer within NETFUND depending on the subject matter of the complaint.
- e) Complaints received should be resolved as soon as possible. NETFUND shall aim to resolve all complaints within fifteen (15) working days of receiving the complaint.
- f) Where the complaint cannot be resolved immediately, customers shall be informed of the aforementioned timeframe at the time of making their complaint. Customers shall be informed of the progress of their complaint regularly, especially if there are any delays or changes to what has been agreed upon between the Desk and the customer.
- g) Where appropriate, customers who have had a complaint resolved shall be contacted at a later date to find out whether or not they are satisfied with how their complaint was handled.
- h) Where a complaint cannot be resolved by the foregoing complaint handling procedure, it shall be referred to the CEO and the customer shall be informed and given an amended timeframe for resolution.
- i) The Desk shall report to the NETFUND Public Complaints Committee on the complaints filed and their status on a monthly basis.

8.3 Complainants who cannot read or write, shall make their Complaints in person where the secretariat will help fill in the form;

8.4 For Complaints against NETFUND Management, the Complainant shall be advised to lodge his / her Complaint with the PCC for redress, and

8.5 For Complaints against a member of the PCC, the affected staff shall not participate in the handling of the Complaint for fair mediation and resolution.

8.6 The PCC shall compile the Complaints received, and action taken for each quarter and submit a report to the Head of Department, Communications for onward submission to the CEO's Office for submission to CAJ.

8.7 At the end of each financial year, the PCC shall apply for Complaint Certificate from the CAJ.

9 Review of Policy

The Public Complaints Policy shall be reviewed at least once every two years or as need arises to ensure that it remains relevant to effectively address customer complaints.

10 ANNEX 1: PUBLIC COMPLAINTS MANAGEMENT PROCEDURES

10.1 Introduction

National Environment Trust Fund (NETFUND) is a State Corporation established under the Environment Management and Co-ordination Act (EMCA 1999). NETFUND officially started its operations in 2006 and is broadly mandated to 'facilitate research intended to further the requirements of environmental management, environmental awards, capacity building, environmental publications, scholarships and grants. 'NETFUND's vision is a society empowered and motivated to sustainably

manage the environment. This vision draw's from Kenya's Vision 2030 whose social pillar advocates for "a just and cohesive society enjoying reputable social development in a clean and secure environment". NETFUND's mission is empowering Kenyans to sustainably manage the environment through promotion and support for green initiatives.

Part of the requirements of NETFUND's Performance Contract with the Government of Kenya is the establishment of mechanisms for handling Public Complaints. Some of the requirements include the establishment of a Public Complaints Committee, Procedures for handling complaints, development and creation of the public's awareness on the service charter and the resolution mechanisms and actual resolution of all complaints (internal and external) received. Quarterly reports are expected to the Commission on Administrative Justice (Ombudsman) on the status of resolution of public complaints. Public Complaints Resolution is required of all government-owned institutions including State Corporations and Ministries under the Performance Contract.

10.2 Public Complaints Desk

NETFUND has established a Public Complaints Desk (the Desk) that handles all public complaints with regard to the mandate of NETFUND. The establishment of the Desk is also part of NETFUND's obligations under the Performance Contract with the Government of the Republic of Kenya. The Desk is located in a designated office which is equipped with a telephone facility and an email complaints@netfund.go.ke.

10.3 Complaint-Handling Procedure

At NETFUND, a complaint is defined as:

"Any expression of dissatisfaction by a customer or potential customer about service delivery or facilities by the members of staff of NETFUND or about any policy of NETFUND."

NETFUND is committed to consistent, fair and confidential complaint handling and to resolving complaints as quickly as possible. NETFUND aims to make it easy for the members of the public to make a complaint if they are dissatisfied with NETFUND services. NETFUND shall, therefore, provide Complaints/ Compliments/Suggestions Box, dedicated emails and phone lines and a Complaints Form, situated at a suitable and discrete location for the public to provide their feedback. NETFUND shall treat all customers making a complaint equally.

The following is the procedure for handling complaints at NETFUND:

1. A complaint may be received either by telephone, e-mail, a letter or in person filed through the NETFUND Complaints Form.
2. Once a complaint is received, it shall be recorded by the Desk and accorded a case reference number to facilitate follow-up. A record of a complaint shall include the name and contact details of the customer, full details of the complaint including the date, as well as

details of all communication with the customer and any actions to resolve the complaint.

3. The Committee shall immediately acknowledge receipt of a complaint within 24 hours and continuously update the Complainant on the status of the resolution process.
4. The complaint shall then be directed to the appropriate Officer within NETFUND depending on the subject matter of the complaint.
5. Complaints received should be resolved as soon as possible. NETFUND shall aim to resolve all complaints within fifteen (15) working days of receiving the complaint.
6. Where the complaint cannot be resolved immediately, customers shall be informed of the aforementioned timeframe at the time of making their complaint. Customers shall be informed of the progress of their complaint regularly, especially if there are any delays or changes to what has been agreed upon between the Desk and the customer.
7. Where appropriate, customers who have had a complaint resolved shall be contacted at a later date to find out whether or not they are satisfied with how their complaint was handled.
8. Where a complaint cannot be resolved by the foregoing complaint handling procedure, it shall be referred to the CEO and the customer shall be informed and given an amended timeframe for resolution.
9. The Desk shall report to the NETFUND Public Complaints Committee on the complaints filed and their status on a monthly basis.

10.4 Handling Anonymous Complaints

NETFUND will act on anonymous complaints as per Procedure (C) above after assessing the following:

1. The seriousness of the matter reported;

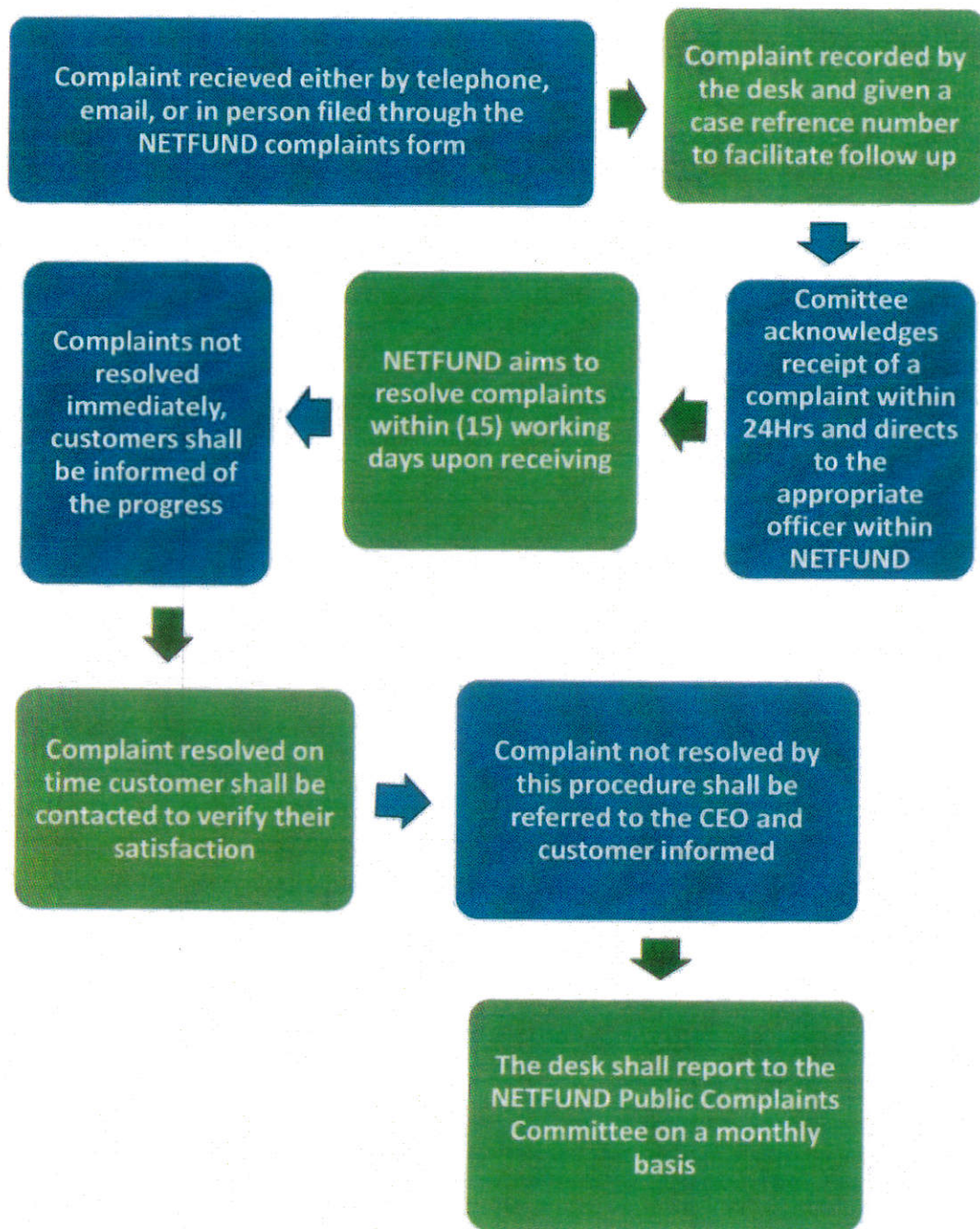
2. The extent to which allegations are specific (e.g. it is clear what is being alleged, dates, times, locations, consequences of wrongdoing, names of witnesses);
3. The extent to which allegations are based on reliable information, not simply on hearsay;
4. Reasons to believe that there is justification for the matter being reported anonymously and not through channels that allow for easier scrutiny; and
5. Whether the language used is abusive or otherwise suggests a poison-pen letter.

Where NETFUND has no way of contacting the person making the anonymous complaint, all of the necessary information for a decision to take further must be clearly available.

Anyone making an anonymous complaint should be aware that NETFUND:-

1. May hand the complaint(s) over to the police or other authorities for their views or with a request to investigate the allegations further if deemed appropriate;
2. Will provide the person(s) accused or implicated in the alleged wrongdoing with copies of the allegation(s);
3. Is obliged to support employee(s) named in anonymous allegations until such a time as there may be sufficient evidence to justify any action against them.

FLOW CHART: NETFUND COMPLAINTS HANDLING PROCEDURE



11 ANNEX 2: COMPLAINTS REGISTER TEMPLATE

[illegible]

12 ANNEX 3: QUARTERLY COMPLAINTS REPORTING TEMPLATE

[illegible]

Complete this form in full and send its original copy to the CEO on the above address. Information provided on this form is confidential and will only be used by NETFUND in an authorized manner. NETFUND may pass on the details of your complaints to other government agencies who investigate customer complaints.

1. Complainant's details

Full Names

Address P.O. Box

Postcode.....

City/Town:

Telephone Mobile

Fax Email

Nature of Business or if Personal/Individual

(ii) **Complaint details** (Please indicate details of the service provider you are complaining about)

Full Name of Staff or Department

2. **Type of complaint** (Please tick the category that best describes your complaint)

- ☐ Lack of professionalism
- ☐ Poor quality of service
- ☐ Faulty Telephone lines
- ☐ Late payment
- ☐ False and misleading advertisements

- ☐ Intrusion of privacy
- ☐ Health and safety
- ☐ Poor Customer service

3. Nature/Facts of the Complaint (Briefly narrate the complaint or alleged practice by the staff/department)

4. Have you exhausted the complaints mechanism provided by the Accused person/department?

- ☐ Yes
- ☐ No

Note: Please attach all relevant document (s) to support your complaint (s).

14 ENDORSEMENTS AND AUTHORIZATION

Signature: 

Date: 10th April 2019

Samson Toniok

Ag. Chief Executive Officer and Secretary to the Board of Trustees

The NETFUND Board of Trustees hereby approves the Public Complaints Policy and Procedures to be operative for a period of five years and subject to review after this period.

Signature: 

Date:

Title and Full name:

Duly appointed Board Representative



NATIONAL ENVIRONMENT TRUST FUND

PROJECT RISK REGISTER

AUGUST 2019

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PREFACE

For any organization that undertakes projects, identification and management of risk is a critical component in successful implementation of projects. Indeed, success or failure of projects can be closely linked to mitigation and management of identified risks.

The NETFUND Project risk register therefore sets out the systematic processes of identifying, recording and managing risk for successful project implementation in NETFUND. The register will provide management with an excellent risk monitoring tool that will be used for overall project assessment. Additionally, the tool enables the organization to be more proactive in anticipation of possible deviations and uncertainties in management of projects.

This tool is also important for reporting project progress to the various stakeholders especially the Government of Kenya and development partners who are the usual contributors to most of the projects undertaken by NETFUND.

As the organization seeks to spearhead the Country's access to international funds like the Green Climate Fund, the risk register forms a useful evaluation tool and is in conformity with International best practices.

We are therefore sure that the formal adoption of this risk register will go a long way in strengthening internal risk processes and contribute significantly to the quality of projects undertaken by NETFUND.

Samson Toniok

Ag. Chief Executive Officer

Introduction

A risk is the likelihood that a project will fail to meet its objectives. It implies future uncertainty about deviation from expected outcome.

Risk Management

ISO 31000 defines risk management as the process of identification, evaluation, and prioritization of risks followed by coordinated and economical application of resources to minimize, monitor, and control the probability or impact of unfortunate events or to maximize the realization of opportunities.

Project Risk Management

It is the process of identifying, analyzing and then responding to any risk that arises over the life cycle of a project to help the project remain on track and meet its goal. Organizational risk policy can be used for optimizing investments and minimizing minimize the possibility of failure.

What is a Risk Register?

The Risk Register records details of all the risks identified at the beginning and during the life of the project. It details risk grading in terms of likelihood of occurrence and seriousness of impact on the project, initial plans for mitigating each high level risk, the costs and responsibilities of the prescribed mitigation strategies and subsequent results.

It usually includes:

- i. Unique identifier for each risk
- ii. Description of each risk and how it will affect the project
- iii. An assessment of the likelihood that it will occur and the possible seriousness/impact if it does occur (low, medium, high)
- iv. Grading of each risk according to a risk assessment table
- v. The person designated to manage the risks
- vi. An outline of proposed mitigation actions (preventative and contingency) and in larger projects, costings for each mitigation strategy.

Risk Register should be maintained throughout the project and will change regularly as existing risks are re-graded in the light of the effectiveness of the mitigation strategy and new risks are identified. In smaller projects, the Risk Register is often used as the Risk Management Plan.

Importance of a Risk Register

- i. Provides a useful tool for managing and reducing the risks identified before and during the project
- ii. Documents the risk mitigation strategies being pursued in response to the identified risks and their grading in terms of likelihood and seriousness
- iii. Provides the Project Sponsor, Steering Committee/Senior management with a documented framework from which risk status can be reported
- iv. Ensures the communication of risk management issues to key stakeholders
- v. Provides a mechanism for seeking and acting on feedback to encourage the involvement of the key stakeholders
- vi. Identifies the mitigation actions required for implementation of the risk management plan and associated costings.

Project risk framework

The framework describes the risks that might affect project implementation, causes, effects and proposed mitigation measures.

Risk category	Risk	Causes	Effects	Rating	Mitigation measures	Timeline for Mitigation	Responsibility
Operational	Project failure	Poor design of the project.	Wastage of resources	High	Adequate resource allocation at the design stage		Project Manager
			Non achievement of objectives				
		Lack of proper stakeholder engagement during project implementation	Conflict during project implementation		Stakeholder engagement at project design.		
			Political interference at the grass root.		Lobby for political support at project design.		
		Failure to conduct due diligence on project implementers.	Misappropriation of project funds leading to project failure.		Proper due diligence on all projects. Follow due diligence manual.		
		Failure to conduct project viability.	Funded Unviable project		Conduct project viability as part of feasibility study.		

Risk category	Risk	Causes	Effects	Rating	Mitigation measures	Timeline for Mitigation	Responsibility
		Conflict of interest in beneficiary's identification	Failure to award deserving projects.		Declaration of conflict of interest		
		Governance issues, Poor administration of the project implementers.	Failed projects Loss of funds		Due diligence on project implementers.		
		Weak internal control systems.			Strengthen internal control system.		
					Regular monitoring and evaluation.		
		Inaccurate budget forecasts and estimates	Incomplete projects		Inclusive budgeting process.		
		Key staff /Technical staff turnover			Create a conducive environment. Succession planning		
		Rapid change in technology during project lifetime.	Failed project		Use of updated technology.		
		Lack of experience and skills in the			Engage qualified technical staff.		

Risk category	Risk	Causes	Effects	Rating	Mitigation measures	Timeline for Mitigation	Responsibility
		project being implemented.					
		Inadequate monitoring and evaluation			Scheduled monitoring and evaluation.		
		Non-compliance with donor/ government requirements	Withdrawal of government/ donor funding		Compliance with donor/ government requirements.		
	Lack of business continuity	Lack of succession program	Failed projects in case the project manager resigns/leaves the Fund	Moderate	Implementation of succession plan		Chief Executive Officer
Financial	Inadequate Assurance from Internal Audit	Lack of Independence to provide assurance on governance, risk management and controls	Misappropriation of project Fund	Possible	Adherence to international standards of Auditing		Internal Auditor
	Liquidity / cash flow challenges	Delay in funds disbursement from Government or partners.	Delay in project implementation	High	Timely fulfillment of donor requirements		Finance Director
			Incomplete project				

Risk category	Risk	Causes	Effects	Rating	Mitigation measures	Timeline for Mitigation	Responsibility
Legal and Regulatory		Withdrawal or reduction of funding by donors/ government due to shifting interests of the Funders from grants to loans.			Lobby for timely disbursement from exchequer.		Grants Manager/ Internal Auditor
			Wastage of resources		Align project proposal with donor interest.		
		Loss of funds	Loss of funds to corrupt officers.	Possible	Strengthen Internal Control System		
		Fraudulent and corrupt practices by project implementers			Frequent audits		
					Automation of payment system to enhance audit trail.		
		Exchange rate fluctuations	Loss of funds during transactions		Negotiation of exchange rate with the bank.		
		Non-Compliance with the donor policies, agreements and guidelines in grant management	Donor recall of the funds.	High	Frequent Audit to check on compliance		
	Withdrawal of funding from Government and existing donors during project implementation		Reputational damage.		Monitoring and Evaluation		
	Litigation			High	Legal Audit.		

Risk category	Risk	Causes	Effects	Rating	Mitigation measures	Timeline for Mitigation	Responsibility
Technological		Non-Compliance with relevant laws and regulations. i.e. PPDA, PFM,			Sensitization of staff on Legal requirements.		
		Disclosure of intellectual property of the innovators		High	Enforcement of Nondisclosure Agreement.		
	Obsolete Technology used in project implementation	Rapid change in Technology		High	Use of updated technology during project implementation.		Projects Manager

Endorsements and Authorization

Signature:

Date:

Mr. Wilberforce Ntwiga and Chairman Audit Committee

The NETFUND Chairman, Board of Trustees hereby approves the NETFUND Standard Operating Procedures for Internal Audit to be operative



Title and Full name:

Date:

Duly appointed Board Representative

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