



**Afghanistan Educational & Health Development  
Aids Organization(AEHDA)**

# **Procedures for Sub-Partnership of Project Activities**

Approved by:

Chair of BoD

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## Forward Note

Dear Valued Team Members,

It is with great pride and gratitude that we introduce the Sub-Partnerships Procedure for Project Activities within the Afghanistan Educational & Health Development Aids Organization (AEHDA). This comprehensive guide is a testament to our shared commitment to excellence, transparency, and accountability in all our endeavors.

As the custodians of AEHDA's mission and values, we, the Board of Director's, are dedicated to fostering an environment where every sub-partner can thrive, contribute, and make a meaningful impact. This procedure is a vital tool to ensure that our organization collaborates effectively, ethically, and in compliance with all relevant regulations.

The Sub-Partnerships Procedure is the culmination of collective wisdom, expertise, and best practices from our esteemed team. It encompasses a wide range of policies and procedures that govern various aspects of our partnership management, from selection and onboarding to performance evaluation and capacity building.

We strongly encourage each of you to familiarize yourselves with this procedure, as it not only provides guidance but also reflects our organizational values and expectations. By adhering to these procedures, we strengthen the foundation upon which our shared mission stands.

Should you have any questions, require clarification, or wish to propose enhancements to any aspect of this procedure, we invite you to reach out to the Program Department or the Board directly. Your insights and feedback are invaluable as we continuously strive for excellence in our collaborative efforts.

Thank you for your unwavering dedication to the cause of the HAS and the transformative work we undertake. Together, we are shaping a brighter future for those we serve.

Warm regards,

Chairman of the Board of Director's  
Afghanistan Educational & Health Development Aids Organization (AEHDA)

## 1. Introduction

This policy governs the procedures and protocols for engaging sub-partners in AEHDA's projects and initiatives. It outlines the standards and expectations for selecting, managing, and evaluating sub-partners to ensure effective collaboration and adherence to ethical, legal, and operational standards.

### 1.1 Purpose of the Policy

The purpose of this policy is to establish a standardized and transparent framework for the engagement and management of sub-partners in projects undertaken by HAS. It aims to ensure that sub-partners are selected based on rigorous assessment criteria, possess the requisite qualifications and capabilities, and adhere to high ethical standards.

### 1.2 Scope of Application

This policy applies to all engagements with sub-partners involved in projects or initiatives funded, supported, or implemented by HAS. It encompasses partnerships with non-governmental organizations (NGOs), governmental bodies, private sector entities, community-based organizations, and any other relevant stakeholders. The policy is applicable throughout the entire lifecycle of a project, from the initial selection of sub-partners through to project completion and evaluation. It is mandatory for all staff members, stakeholders, and individuals involved in the identification, selection, management, and oversight of sub-partners to adhere to the provisions outlined in this policy. This policy also extends to any contractual or agreement-related matters with sub-partners, including but not limited to, financial arrangements, reporting obligations, and performance assessments.

### 1.3 Definitions

- **Sub-Partner:** Any external organization, entity, or individual engaged by HAS to participate in the execution of a project or initiative, with specific roles and responsibilities defined in a formal agreement.
- **Pre-Award Assessment:** A comprehensive evaluation process conducted before entering into an agreement with a sub-partner, assessing their registration status, qualifications, internal controls, and ethical standing.

- **Formal Agreement:** A legally binding document that outlines the terms and conditions of engagement between HAS and the sub-partner, including work description, reporting obligations, funding conditions, and termination clauses.
- **Internal Control Systems:** The policies, procedures, and mechanisms put in place by a sub-partner to ensure financial integrity, compliance with regulations, and the safeguarding of assets.
- **Ethical Concerns:** Issues related to the moral or professional conduct of a sub-partner, including but not limited to conflicts of interest, bribery, corruption, discrimination, or violations of human rights.
- **Financial Verification:** The process of reviewing and confirming the accuracy and validity of financial reports and accompanying documentation submitted by a sub-partner.
- **Implementation Monitoring:** The systematic oversight of project activities and deliverables performed by a sub-partner to ensure compliance with agreed-upon milestones and quality standards.
- **Poor Performance:** Sub-standard delivery of services, failure to meet agreed-upon targets, or any other deviation from expected performance levels.
- **Mismanagement:** Inefficient or ineffective use of resources, failure to adhere to agreed-upon procedures, or other practices that hinder project progress.
- **Misconduct:** Behavior contrary to established professional or ethical standards, including but not limited to fraud, dishonesty, harassment, or any form of unethical conduct.
- **Code of Conduct:** A set of ethical guidelines and principles that sub-partners are expected to adhere to, reflecting values such as integrity, accountability, and respect for human rights.
- **Continuous Improvement:** Ongoing efforts to enhance the effectiveness, efficiency, and integrity of sub-partner engagements through feedback, evaluation, and process refinement.
- **Record Keeping:** The systematic storage and maintenance of documentation related to sub-partner engagements for audit, reporting, and accountability purposes.

- **Stakeholders:** Individuals or entities, both internal and external to HAS, who have a vested interest in the success and outcomes of sub-partner engagements.

## 2. Pre-Award Assessment

The pre-award assessment process is a critical step in ensuring that sub-partners selected for engagement with HAS meet established criteria and standards. This comprehensive evaluation encompasses several key components:

### 2.1 Registration Status and Legal Standing

This component of the pre-award assessment focuses on verifying the legal existence and standing of the potential sub-partner. It ensures that the sub-partner is duly registered and compliant with all relevant legal and regulatory requirements. The following steps are undertaken:

#### Procedure:

- **Request Documentation:** HAS formally requests the potential sub-partner to provide evidence of its legal registration, including but not limited to certificates of incorporation, business licenses, and any other pertinent legal documents.
- **Verification of Registration Details:** The provided documentation is meticulously reviewed to confirm that it accurately reflects the sub-partner's legal identity, including names, addresses, and registration numbers.
- **Confirmation of Validity:** The validity of the registration documents is cross-verified with the appropriate government or regulatory bodies. This may involve consulting official databases or contacting relevant authorities.
- **Compliance with Local Laws:** HAS ensures that the sub-partner is in full compliance with all local laws and regulations pertinent to their operations and the specific industry or sector of engagement.
- **Review of Any Regulatory Sanctions or Violations:** An investigation is conducted to ascertain if the sub-partner has been subject to any regulatory sanctions, penalties, or legal violations in the past. This includes, but is not limited to, assessments of tax compliance, labor laws, and environmental regulations.
- **Confirmation of Good Standing:** HAS verifies that the sub-partner is in good legal standing and has not faced any recent legal disputes, litigation, or court actions that might raise concerns about their ability to fulfill their obligations.

- **Assessment of Compliance with Funding Source Requirements:** Ensuring that the sub-partner's legal status aligns with any specific requirements or restrictions set forth by the funding source (e.g., UN agency or other donor) is essential.
- **Documentation and Recordkeeping:** All documentation related to the verification of the sub-partner's registration status and legal standing is systematically recorded and stored for future reference, including any communication with regulatory bodies.
- **Approval and Authorization:** Once the sub-partner's legal standing has been confirmed, and no significant legal or regulatory issues have been identified, the assessment is documented and approved as part of the pre-award evaluation process.

## 2.2 Qualifications and Expertise

This component of the pre-award assessment focuses on evaluating the sub-partner's qualifications, expertise, and experience in the specific field or sector relevant to the project. It ensures that the sub-partner possesses the necessary skills and knowledge to effectively contribute to the project's objectives. The following steps are undertaken:

### Procedure:

- **Request for Qualification Documentation:** HAS formally requests the potential sub-partner to provide documentation demonstrating their qualifications, expertise, and relevant experience in the specific field or sector of the project.
- **Review of Educational and Professional Credentials:** The provided documentation, including academic degrees, certifications, licenses, and professional memberships, is thoroughly examined to verify their authenticity and relevance to the project.
- **Assessment of Relevant Experience:** HAS evaluates the sub-partner's track record in similar projects or initiatives, including the scope, scale, and outcomes of their previous engagements.
- **Verification of References:** HAS contacts references provided by the sub-partner, which may include previous clients, partners, or stakeholders, to validate the sub-partner's performance and expertise.
- **Technical and Functional Competency Assessment:** A detailed examination of the sub-partner's technical skills, capabilities, and proficiency in the specific areas required for the project is conducted.



- **Specialized Training or Expertise:** HAS assesses whether the sub-partner possesses any specialized training, certifications, or unique expertise that is particularly relevant to the project's requirements.
- **Capacity to Mobilize Resources:** HAS evaluates the sub-partner's ability to mobilize the necessary human, financial, and material resources to carry out their designated responsibilities effectively.
- **Alignment with Project Goals and Objectives:** The sub-partner's qualifications and expertise are assessed for alignment with the overall goals and objectives of the project, ensuring a seamless integration into the project team.
- **Documentation and Recordkeeping:** All documentation related to the assessment of the sub-partner's qualifications and expertise is systematically recorded and stored for future reference, including any communication with references or verification sources.
- **Approval and Authorization:** Once the sub-partner's qualifications and expertise have been thoroughly assessed, the findings are documented and approved as part of the pre-award evaluation process.

### 2.3 Internal Control Systems Evaluation

This component of the pre-award assessment focuses on examining the internal control systems of the potential sub-partner. It ensures that the sub-partner has robust mechanisms in place to manage finances, adhere to regulations, and safeguard assets. The following steps are undertaken:

#### Procedure:

- **Request for Internal Control Documentation:** HAS formally requests the potential sub-partner to provide documentation outlining their internal control systems, including financial management, procurement procedures, and risk management protocols.
- **Review of Financial Management Controls:** The provided documentation is meticulously examined to assess the sub-partner's controls for budgeting, accounting, financial reporting, and expenditure tracking.

- **Evaluation of Procurement Procedures:** HAS assesses the sub-partner's procurement policies and procedures to ensure transparency, competition, and compliance with relevant regulations.
- **Verification of Risk Management Protocols:** The sub-partner's strategies for identifying, assessing, and mitigating financial, operational, and compliance risks are evaluated.
- **Assessment of Asset Safeguarding Measures:** HAS examines how the sub-partner safeguards physical and non-physical assets, including equipment, inventory, and intellectual property.
- **Compliance with Industry Standards and Best Practices:** The internal control systems are evaluated against industry-accepted standards and best practices to ensure alignment with recognized norms.
- **Evaluation of Segregation of Duties:** HAS assesses whether the sub-partner has established clear divisions of responsibilities to prevent conflicts of interest and maintain accountability.
- **Assessment of Financial Reporting Accuracy and Transparency:** HAS verifies that the sub-partner's financial reports are accurate, complete, and transparent, reflecting a true and fair view of their financial position.
- **Review of Compliance with Regulatory Requirements:** The sub-partner's adherence to relevant financial and operational regulations, including tax compliance, is confirmed.
- **Documentation and Recordkeeping:** All documentation related to the evaluation of the sub-partner's internal control systems is systematically recorded and stored for future reference, including any communication with the sub-partner regarding their controls.
- **Approval and Authorization:** Once the evaluation of the sub-partner's internal control systems is completed, the findings are documented and approved as part of the pre-award assessment process.

## 2.4 Ethical and Reputational Due Diligence

This component of the pre-award assessment focuses on conducting due diligence to identify any significant ethical or reputational concerns associated with the potential sub-partner. It

ensures that the sub-partner adheres to high ethical standards and possesses a favorable reputation. The following steps are undertaken:

**Procedure:**

- **Conduct Background Checks:** HAS conducts thorough background checks on the sub-partner, including online searches, review of public records, and examination of media coverage.
- **Review of Past Engagements:** The sub-partner's history of past engagements, collaborations, and partnerships with other organizations or entities is evaluated to identify any potential ethical or reputational concerns.
- **Assessment of Code of Conduct and Ethics Policies:** HAS reviews the sub-partner's code of conduct and ethics policies to ensure they align with AEHDA's standards and expectations.
- **Evaluation of Conflict of Interest Policies:** The sub-partner's policies and procedures for managing conflicts of interest are assessed to ensure transparency, disclosure, and mitigation measures are in place.
- **Verification of Ethical Certifications or Recognitions:** HAS verifies if the sub-partner holds any ethical certifications, recognitions, or awards that demonstrate their commitment to ethical business practices.
- **Review of Any Disciplinary Actions or Legal Proceedings:** An investigation is conducted to ascertain if the sub-partner has been subject to any disciplinary actions, legal proceedings, or regulatory sanctions related to ethical or reputational concerns.
- **Assessment of Reputation in the Industry or Community:** HAS gathers feedback and insights from industry peers, stakeholders, or community members regarding the sub-partner's reputation and conduct.
- **Review of Complaints or Whistleblower Reports:** HAS examines any complaints, whistleblower reports, or similar documents that may provide insights into the sub-partner's conduct and reputation.
- **Documentation and Recordkeeping:** All documentation related to the evaluation of the sub-partner's ethical and reputational standing is systematically recorded and stored for future reference.

- **Approval and Authorization:** Once the evaluation of ethical and reputational due diligence is completed, the findings are documented and approved as part of the pre-award assessment process.

### 3. Formal Agreement

The formal agreement is a crucial document that outlines the terms and conditions governing the engagement between HAS and the selected sub-partner. It provides a clear framework for the successful execution of the project. The agreement encompasses the following key elements:

#### 3.1 Work Description and Responsibilities

This section of the formal agreement outlines in detail the specific tasks, activities, and responsibilities assigned to the sub-partner. It provides a clear understanding of what is expected from the sub-partner in the context of the project. The following elements are typically included:

**Procedure:**

- **Detailed Task Breakdown:** A comprehensive list of tasks, activities, and deliverables that the sub-partner is responsible for executing. Each task should be described in sufficient detail to ensure clarity.
- **Scope of Services:** A clear definition of the scope of services that the sub-partner is expected to provide, including any specialized skills, equipment, or resources required.
- **Timeline and Milestones:** Specific timelines and milestones for each task or deliverable, indicating deadlines for completion and any intermediate milestones to track progress.
- **Quality Standards and Performance Expectations:** Clearly defined quality standards and performance expectations that the sub-partner must meet for each task or deliverable.
- **Roles and Responsibilities of HAS:** Any roles or responsibilities that HAS will assume in support of the sub-partner's activities, such as providing access to certain resources or facilitating communication with other stakeholders.
- **Collaborative Activities:** Description of any collaborative activities between HAS and the sub-partner, including joint planning, coordination, or decision-making processes.

- **Interface with Other Stakeholders:** Clarification on how the sub-partner will interact with other stakeholders, including AEHDA's staff, external partners, beneficiaries, and relevant authorities.
- **Intellectual Property and Data Ownership:** Specification of ownership rights related to any intellectual property, data, or outputs generated as a result of the sub-partner's work.
- **Risk Management Responsibilities:** Any specific responsibilities assigned to the sub-partner in relation to identifying, assessing, and mitigating risks associated with their tasks or activities.
- **Compliance with Laws and Regulations:** A statement emphasizing the sub-partner's obligation to comply with all applicable laws, regulations, and industry standards in the execution of their tasks.

### 3.2 Reporting and Documentation Obligations

This section of the formal agreement outlines the specific requirements and expectations regarding reporting and documentation that the sub-partner must adhere to throughout the duration of the project. It establishes a structured framework for information exchange and accountability. The following elements are typically included:

#### Procedure:

- **Types of Reports:** Specification of the types of reports and documents that the sub-partner is required to submit. This may include progress reports, financial reports, technical reports, etc.
- **Frequency of Reporting:** Determination of the regularity with which reports and documentation must be submitted. This may be on a weekly, monthly, quarterly, or other specified basis.
- **Format and Content of Reports:** Clear guidelines on the format, structure, and content of reports, including any specific templates or forms that must be used.
- **Financial Reporting Requirements:** Detailed instructions on the financial information that must be included in financial reports, including budgets, expenditures, and any supporting documentation.

- **Documentation of Deliverables:** Requirement for the sub-partner to provide documentation related to the completion of specific deliverables, including evidence of quality assurance checks or client acceptance.
- **Timeline for Report Submission:** Stipulation of specific deadlines by which reports and documentation must be submitted, along with any interim deadlines for partial submissions.
- **Review and Approval Process:** Clarification of the process for HAS to review, provide feedback, and approve or request revisions to the submitted reports and documentation.
- **Distribution and Communication Channels:** Specification of the channels through which reports and documentation should be submitted, including contact information and any designated portals or platforms.
- **Confidentiality and Data Security:** Emphasis on the confidentiality and secure handling of sensitive information in accordance with applicable data protection and privacy regulations.
- **Archiving and Record Retention:** Guidance on the retention of records and documentation, including any specific duration requirements or protocols for archival.

### 3.3 Conditions of Funding

This section of the formal agreement delineates the specific conditions and requirements that must be met by the sub-partner in order to access and utilize the allocated funding for the project. It provides a clear framework for financial management and accountability. The following elements are typically included:

#### Procedure:

- **Disbursement Triggers:** Identification of specific milestones, achievements, or deliverables that serve as triggers for the disbursement of funds to the sub-partner.
- **Budget Allocation and Utilization:** Specification of how the allocated funding is to be budgeted and utilized by the sub-partner, including any restrictions or guidelines on allowable expenses.

- **Compliance with Donor Requirements:** Emphasis on the sub-partner's obligation to comply with any specific requirements or restrictions set forth by the funding source (e.g., UN agency or other donor).
- **Documentation and Reporting for Funding Release:** Requirement for the sub-partner to provide specific documentation or reports as evidence of meeting the conditions for funding release.
- **Tracking and Verification of Expenditures:** Procedures for tracking and verifying the sub-partner's expenditures to ensure they align with the approved budget and funding conditions.
- **Approval and Authorization for Expenditures:** Guidelines on the process for obtaining prior approval or authorization for certain types of expenditures or budget adjustments.
- **Reimbursement Procedures:** If applicable, details on how the sub-partner may seek reimbursement for eligible expenses incurred in line with the project's objectives.
- **Currency and Exchange Rate Considerations:** Any specific provisions regarding currency used for transactions and procedures for managing exchange rate fluctuations if funding is provided in a foreign currency.
- **Audit and Monitoring Requirements:** Stipulation of the sub-partner's cooperation with audits and monitoring activities conducted by HAS or external parties to ensure compliance with funding conditions.
- **Funding Source Notifications:** Procedures for notifying the funding source (e.g., UN agency or other donor) of any significant developments or deviations from the agreed-upon funding conditions.

### 3.4 Termination or Modification Clauses

This section of the formal agreement outlines the procedures and conditions under which the agreement between HAS and the sub-partner may be terminated, modified, or amended. It provides a structured framework for addressing unforeseen circumstances or changes in project requirements. The following elements are typically included:

#### Procedure:



- **Termination for Convenience:** Explanation of the conditions under which either party may choose to terminate the agreement without cause. This may include providing advance notice and any associated obligations.
- **Termination for Cause:** Definition of specific circumstances or events that may constitute grounds for termination due to the sub-partner's non-compliance, poor performance, or breach of contract.
- **Notice Periods:** Specification of the required notice periods for initiating termination, allowing for sufficient time to make necessary arrangements.
- **Effects of Termination:** Clarification of the consequences of termination, including any obligations for the sub-partner to return unused funds or deliverables, and procedures for transitioning responsibilities.
- **Modification or Amendment Procedures:** Guidelines on how modifications or amendments to the agreement may be proposed, reviewed, and implemented. This may include approval requirements and documentation procedures.
- **Dispute Resolution:** Procedures for resolving disputes or conflicts related to proposed modifications, amendments, or termination of the agreement.
- **Notices and Communications:** Requirement for formal written notices and communications to be exchanged between HAS and the sub-partner to initiate any termination, modification, or amendment.
- **Continuation of Certain Obligations:** Identification of any specific obligations or provisions that may continue to apply even after termination, such as confidentiality or intellectual property rights.
- **Transitional Arrangements:** Procedures for transitioning responsibilities, tasks, or deliverables to an alternative party in the event of termination.

## 4. Financial Verification

This section of the policy outlines the procedures for verifying the financial reports and corresponding documentation submitted by the sub-partner before onward reporting to the donor. It ensures accuracy, transparency, and compliance with funding requirements. The following components are included:

### 4.1 Expenditure Report Scrutiny

This component of the financial verification process involves a detailed examination of the expenditure reports provided by the sub-partner. The objective is to ensure that the reported financial information is accurate, complete, and aligns with the approved budget. The following steps are undertaken:

#### Procedure:

- **Receipt and Initial Review:** HAS receives the expenditure report from the sub-partner according to the established reporting schedule. The report is initially reviewed for completeness and adherence to the specified reporting format.
- **Comparison with Approved Budget:** The reported expenditures are compared against the approved budget for the project. This involves a line-by-line comparison to identify any discrepancies or variances.
- **Verification of Cost Categories:** Each expense is scrutinized to ensure it is appropriately categorized and allocated to the correct budget line item.
- **Examination of Supporting Details:** Detailed line items within the expenditure report are examined to verify the legitimacy and necessity of each expense. This may include reviewing invoices, receipts, contracts, and other relevant documentation.
- **Identification of Anomalies:** Any irregularities, unusual patterns, or unexpected fluctuations in expenditure data are flagged for further investigation.
- **Cross-Referencing with Previous Reports (if applicable):** The current expenditure report is compared with previous reports to identify trends, changes in spending patterns, or anomalies that may require additional scrutiny.
- **Query Resolution with Sub-Partner:** Any discrepancies, uncertainties, or anomalies identified during the scrutiny process are communicated to the sub-partner for

clarification or correction. The sub-partner is given an opportunity to provide additional information or explanations regarding the reported expenditures.

- **Documentation of Scrutiny Process:** A record is maintained detailing the steps taken during the expenditure report scrutiny, including any findings, actions taken, and communications with the sub-partner.
- **Approval and Authorization:** Once the expenditure report has undergone thorough scrutiny and any discrepancies have been addressed to satisfaction, it is approved for further processing.

## 4.2 Supporting Documentation Review

This component of the financial verification process involves a detailed examination of the supporting documentation provided by the sub-partner. The objective is to validate the accuracy, legitimacy, and relevance of the expenses reported in the expenditure reports. The following steps are undertaken:

### Procedure:

- **Request for Supporting Documentation:** HAS formally requests the sub-partner to provide documentation supporting the reported expenditures. This may include invoices, receipts, contracts, bills, and other relevant records.
- **Receipt and Initial Verification:** Upon receipt of the supporting documentation, an initial review is conducted to ensure that all required documents are provided and are in a legible and organized format.
- **Verification of Receipts, Invoices, and Bills:** Each individual receipt, invoice, bill, or other relevant document is examined to ensure it is genuine, complete, and accurately reflects the expense in question.
- **Cross-Verification with Expenditure Reports:** The supporting documentation is cross-referenced with the corresponding line items in the expenditure reports to ensure alignment and accuracy.
- **Confirmation of Vendor and Payee Details:** The details of the vendors, suppliers, or payees on the supporting documents are verified to confirm their legitimacy and relevance to the project.

- **Verification of Authorization and Approval:** For expenses that require prior authorization or approval, documentation of the approval process is reviewed to ensure compliance with established procedures.
- **Compliance with Financial Policies:** The supporting documentation is assessed to ensure it complies with AEHDA's financial policies, as well as any specific requirements of the funding source.
- **Recordkeeping of Supporting Documents:** All supporting documents are systematically stored and maintained for audit, reporting, and accountability purposes.
- **Resolution of Discrepancies:** Any discrepancies or irregularities identified during the review of supporting documentation are addressed with the sub-partner, and additional information or clarification may be requested.
- **Documentation of Review Process:** A record is maintained detailing the steps taken during the review of supporting documentation, including any findings, actions taken, and communications with the sub-partner.
- **Approval and Authorization:** Once the supporting documentation has undergone thorough review and any discrepancies have been addressed to satisfaction, it is approved for further processing.

### 4.3 Data Cross-Verification

This component of the financial verification process involves cross-verifying the financial data provided by the sub-partner with other relevant sources to ensure accuracy, completeness, and consistency. The objective is to identify and rectify any discrepancies or inconsistencies in the reported financial information. The following steps are undertaken:

#### Procedure:

- **Access to Relevant Data Sources:** HAS gains access to relevant data sources, which may include internal financial records, external databases, or third-party reports.
- **Extraction and Compilation of Data:** Data related to project expenditures, revenues, and financial transactions is extracted from the various relevant sources and compiled for cross-verification.

- **Comparison with Sub-Partner's Reports:** The financial data provided by the sub-partner, including expenditure reports and supporting documentation, is compared with the data extracted from other sources.
- **Identification of Discrepancies or Inconsistencies:** Any discrepancies, inconsistencies, or deviations between the sub-partner's reported data and the cross-verified data are identified and flagged for further investigation.
- **Root Cause Analysis:** An in-depth analysis is conducted to determine the root causes of identified discrepancies. This may involve reviewing supporting documentation, consulting with the sub-partner, and conducting additional research.
- **Resolution of Discrepancies:** Any identified discrepancies are addressed through communication with the sub-partner, further examination of supporting documentation, or additional verification steps.
- **Documentation of Cross-Verification Process:** A record is maintained detailing the steps taken during the data cross-verification process, including any findings, actions taken, and resolutions.
- **Reporting of Findings:** The findings of the data cross-verification process are documented and may be included in periodic financial reports or reports to the donor.
- **Continuous Monitoring and Follow-Up:** Ongoing monitoring is conducted to ensure that any identified discrepancies are addressed and that corrective actions are implemented by the sub-partner.
- **Documentation of Corrective Actions:** If corrective actions are taken by the sub-partner in response to identified discrepancies, these actions are documented for future reference and follow-up.

## 5. Implementation Monitoring

This section outlines the procedures for monitoring the implementation of project activities by the sub-partner. It aims to ensure that tasks are executed effectively, in line with project objectives, and in compliance with the agreed-upon standards. The following components are included:

### 5.1 Site Visits and Progress Reports

This component of the implementation monitoring process involves conducting site visits to project locations and reviewing progress reports to assess the status of project activities and provide ongoing feedback. It aims to ensure that tasks are being executed effectively, in line with project objectives, and in compliance with agreed-upon standards. The following steps are undertaken:

#### Procedure:

- **Site Visit Planning:** HAS schedules and plans site visits to project locations where sub-partner activities are being implemented. This includes identifying visit dates, locations, and objectives.
- **Advance Notification to Sub-Partner:** The sub-partner is notified in advance about the upcoming site visit, providing sufficient notice for preparations.
- **On-Site Assessment:** During the site visit, HAS representatives conduct a comprehensive assessment of the progress of project activities. This involves:
  - Observing the execution of tasks and activities.
  - Verifying that activities are aligned with project plans and objectives.
  - Checking for compliance with quality standards and safety protocols.
  - Engaging with the sub-partner's team to gather insights and address any concerns.
- **Documentation of Site Visit Findings:** Detailed records are maintained, documenting observations, findings, and any notable aspects identified during the site visit.

- **Review of Progress Reports:** Concurrently, HAS reviews progress reports submitted by the sub-partner for the corresponding period. This includes cross-verifying reported progress with observations from the site visit.
- **Verification of Deliverables and Milestones:** Confirmation is sought to ensure that project deliverables and milestones align with the reported progress and are of the expected quality.
- **Feedback and Recommendations:** Based on the site visit findings and progress report reviews, HAS provides constructive feedback to the sub-partner. Recommendations for improvement or adjustments, if necessary, are communicated.
- **Agreement on Corrective Actions:** If any discrepancies or areas for improvement are identified, HAS works collaboratively with the sub-partner to agree on corrective actions and timelines.
- **Documentation of Site Visit Report:** A comprehensive site visit report is generated, summarizing observations, feedback provided, corrective actions agreed upon, and any recommendations for improvement.
- **Communication with Stakeholders:** Relevant stakeholders, including the sub-partner and other project team members, are informed of the site visit findings and any agreed-upon actions.

## 5.2 Deliverable Quality and Timeliness

This component of the implementation monitoring process focuses on evaluating the quality and timeliness of deliverables produced by the sub-partner. It ensures that project outputs meet the specified standards and are delivered within the agreed-upon timelines. The following steps are undertaken:

### Procedure:

- **Definition of Deliverables:** Clear definition of project deliverables, including their specifications, quality standards, and expected timelines. This is established in the formal agreement.
- **Submission of Deliverables:** The sub-partner submits project deliverables in accordance with the agreed-upon schedule and milestones.

- **Review of Deliverables:** HAS evaluates the quality of each deliverable against the established criteria. This involves a comprehensive assessment of the content, functionality, and overall compliance with project requirements.
- **Verification of Timeliness:** Confirmation is sought to ensure that each deliverable is submitted within the agreed-upon deadlines or milestones.
- **Quality Assessment Criteria:** Clear criteria are used to assess the quality of deliverables, which may include accuracy, completeness, adherence to specifications, user-friendliness, and overall effectiveness in meeting project objectives.
- **Feedback on Deliverable Quality:** HAS provides specific feedback to the sub-partner regarding the quality of each deliverable. This may include commendations for areas of strength and constructive feedback for areas that require improvement.
- **Recognition of Adherence to Standards:** Deliverables that meet or exceed the established quality standards are recognized and acknowledged as successes.
- **Addressing Quality Issues:** If any deliverables do not meet the specified quality standards, HAS collaborates with the sub-partner to identify corrective actions and establish a timeline for revisions.
- **Documentation of Deliverable Reviews:** Detailed records are maintained, documenting the review process for each deliverable, including findings, actions taken, and any agreed-upon adjustments.
- **Feedback Loop with Sub-Partner:** A feedback loop is established with the sub-partner to ensure that any identified issues are addressed promptly and that subsequent deliverables meet the required quality standards.



## 6. Handling Poor Performance, Mismanagement, and Misconduct

This section outlines the procedures for addressing instances of poor performance, mismanagement, and misconduct by the sub-partner. It provides a structured framework for communication, issue resolution, corrective actions, and, if necessary, escalation and termination. The following components are included:

### 6.1 Communication and Issue Resolution

This component of the policy focuses on establishing effective communication channels and procedures to address instances of poor performance, mismanagement, and misconduct by the sub-partner. It emphasizes open and transparent dialogue to find constructive solutions. The following steps are undertaken:

#### Procedure:

- **Identification of Performance Issues:** HAS identifies instances of poor performance, mismanagement, or misconduct through regular monitoring, assessments, and feedback mechanisms.
- **Private Communication with Sub-Partner:** HAS initiates a private and confidential discussion with the sub-partner to address the identified issues. This may involve a face-to-face meeting, video conference, or written communication.
- **Selecting the Appropriate Communication Channel:** Depending on the nature and urgency of the issue, HAS chooses the most suitable communication channel. This may include in-person meetings, phone calls, video conferences, or written correspondence.
- **Clear Articulation of Concerns:** HAS clearly articulates the specific concerns, providing examples and evidence where applicable, to ensure mutual understanding.
- **Active Listening and Feedback:** Both parties engage in active listening to understand each other's perspectives. HAS provides constructive feedback and seeks input from the sub-partner.
- **Collaborative Problem-Solving:** HAS and the sub-partner work collaboratively to identify potential solutions or corrective actions to address the identified issues.

- **Establishing Timelines for Resolution:** Clear timelines are set for addressing the identified issues, ensuring that actions are taken in a timely manner.
- **Documentation of Communication:** Records of all communications related to performance issues, including concerns raised, discussions held, and agreed-upon actions, are documented for future reference.
- **Feedback Loop with Sub-Partner:** A feedback loop is established with the sub-partner to ensure that any identified issues are addressed promptly and that subsequent performance meets the required standards.
- **Follow-Up Communication:** HAS conducts follow-up communications to track progress on issue resolution and ensure that corrective actions are being implemented.

## 6.2 Formal Warnings and Corrective Action Plans

This component of the policy outlines the procedures for formalizing the process of addressing poor performance, mismanagement, and misconduct by the sub-partner through the issuance of formal warnings and the development of corrective action plans. It provides a structured framework for addressing and rectifying identified issues. The following steps are undertaken:

### Procedure:

- **Issuance of Formal Warning:** If performance issues persist after initial communication and attempts at resolution, HAS may issue a formal written warning to the sub-partner.
- **Formal Warning Content:** The formal warning document clearly outlines the specific concerns, expectations, and any consequences if improvements are not made within a defined timeframe.
- **Delivery of Formal Warning:** The formal warning is delivered to the sub-partner in a manner that ensures it is received and acknowledged. This may involve in-person delivery, registered mail, or electronic communication.
- **Development of Corrective Action Plan:** Simultaneously, HAS collaborates with the sub-partner to develop a formal corrective action plan. This plan outlines specific actions, responsibilities, timelines, and milestones for improvement.

- **Clear Responsibilities and Accountability:** Roles and responsibilities for both HAS and the sub-partner are clearly defined within the corrective action plan, ensuring accountability for achieving the agreed-upon milestones.
- **Mutual Agreement on Corrective Actions:** Both parties review and agree upon the content of the corrective action plan, ensuring that it is realistic, achievable, and addresses the identified issues.
- **Regular Progress Reviews:** HAS conducts regular reviews to assess progress against the corrective action plan. These reviews may include site visits, progress reports, and performance metric assessments.
- **Documentation of Corrective Actions:** Records of all formal warnings, corrective action plans, progress reviews, and associated communications are maintained for thorough documentation.
- **Recognition of Improvement:** If the sub-partner demonstrates significant improvement in performance as a result of the corrective action plan, this progress is acknowledged and positively reinforced.
- **Feedback Loop with Sub-Partner:** A feedback loop is established with the sub-partner to ensure that any identified issues are addressed promptly and that subsequent performance meets the required standards.

### 6.3 Escalation and Termination Procedures

This component of the policy outlines the procedures for escalating the handling of poor performance, mismanagement, and misconduct if the issues persist and termination of the agreement with the sub-partner becomes necessary. It provides a structured framework for making decisions about escalation and termination while ensuring fairness and due process. The following steps are undertaken:

#### Procedure:

- **Escalation to Higher Authorities:** If performance issues continue despite formal warnings and corrective action plans, HAS may escalate the matter to higher authorities within the organization. This may include department heads, senior management, or general director.

- **Formal Documentation of Escalation:** A formal document outlining the performance issues, actions taken, and reasons for escalation is prepared and submitted to the relevant higher authorities.
- **Review and Assessment:** The higher authorities review the documented case, considering all available evidence and documentation related to the sub-partner's performance.
- **Decision-Making Process:** The higher authorities make a decision regarding the appropriate course of action. This may involve continued monitoring, additional corrective actions, or, in severe cases, termination.
- **Notification to Sub-Partner:** If escalation leads to further actions, HAS formally notifies the sub-partner of the decision made by the higher authorities. This notification includes reasons for the decision and any additional steps to be taken.
- **Consideration of Termination:** HAS evaluates whether termination of the agreement with the sub-partner is warranted based on the severity and persistence of the performance issues.
- **Formal Termination Notice:** If termination is deemed necessary, HAS follows the formal notification and termination process as outlined in the agreement. This includes providing notice and outlining the reasons for termination.
- **Transition and Handover Plan:** HAS develops a transition and handover plan to ensure that project activities and responsibilities are smoothly transferred to an alternative party, if required.
- **Documentation of Termination:** A formal record of the termination process, including notices, communications, and the handover plan, is maintained for future reference.

## 7. Ethical Standards and Code of Conduct

This section of the policy emphasizes the importance of upholding high ethical standards and a code of conduct within the partnership. It outlines the organization's commitment to anti-corruption, anti-bribery, respect for human rights and diversity, as well as legal and regulatory compliance. The following components are included:

### 7.1 Commitment to Anti-Corruption and Anti-Bribery Policies

This component of the policy emphasizes the organization's strong commitment to combating corruption and bribery in all its activities. It outlines the procedures for ensuring compliance with anti-corruption and anti-bribery policies.

#### Procedure:

- **Clear Policy Statement:** HAS establishes a clear and comprehensive policy statement that unequivocally condemns all forms of corruption and bribery. This statement reaffirms the organization's commitment to conducting its activities with the highest standards of integrity and transparency.
- **Policy Dissemination:** The anti-corruption and anti-bribery policies are widely communicated to all stakeholders, including sub-partners.
- **Training and Awareness Programs:** HAS conducts regular training and awareness programs on anti-corruption and anti-bribery policies. These programs aim to educate all parties, including employees, sub-partners, and relevant stakeholders, about the policies, legal implications, and consequences of non-compliance.
- **Periodic Policy Review and Updates:** HAS conducts regular reviews of its anti-corruption and anti-bribery policies to ensure that they remain up-to-date with evolving legal and ethical standards. Updates are made as necessary, and stakeholders are informed of any changes.
- **Monitoring and Reporting Mechanisms:** Robust mechanisms are established for monitoring compliance with anti-corruption and anti-bribery policies. This includes channels for reporting suspected violations or concerns related to corruption or bribery. Confidential reporting options may also be provided to protect whistleblowers.
- **Investigation of Suspected Violations:** In cases where suspected violations of anti-corruption and anti-bribery policies are reported, HAS conducts thorough and

impartial investigations. These investigations are conducted with utmost confidentiality and in compliance with applicable laws and regulations.

- **Corrective Actions and Disciplinary Measures:** If a violation is substantiated, HAS takes appropriate corrective actions and disciplinary measures. The severity of the action taken is commensurate with the gravity of the violation and may include warnings, sanctions, termination of partnership, and, in severe cases, legal action.
- **Documentation of Anti-Corruption Efforts:** Comprehensive records are maintained documenting all efforts related to anti-corruption and anti-bribery initiatives, including policy dissemination, training programs, reports, investigations, and corrective actions taken.

## 7.2 Legal and Regulatory Compliance

This component of the policy emphasizes the AEHDA's commitment to adhering to all relevant laws and regulations in the jurisdictions where it operates. It outlines the procedures for ensuring compliance with legal and regulatory requirements.

### Procedure:

- **Regular Legal and Regulatory Review:** HAS conducts regular reviews to ensure that all activities and operations, including those involving sub-partners, comply with applicable laws and regulations.
- **Legal Due Diligence for Sub-Partners:** Prior to engaging sub-partners, HAS conducts due diligence to verify that they are appropriately registered and compliant with relevant legal and regulatory requirements. This includes reviewing licenses, permits, certifications, and other documentation as described above.
- **Monitoring and Reporting on Compliance:** Robust mechanisms are established for monitoring and reporting on compliance with legal and regulatory requirements. This includes regular audits, reviews, and assessments to ensure ongoing adherence.
- **Response to Legal Changes:** HAS stays informed about changes in relevant laws and regulations. When significant changes occur, HAS promptly assesses their impact and takes appropriate actions to ensure compliance.
- **Handling Legal Disputes:** In the event of legal disputes or conflicts, HAS follows established procedures for resolution.

- **Documentation of Compliance Efforts:** Comprehensive records are maintained documenting all efforts related to legal and regulatory compliance, including due diligence on sub-partners, audits, reviews, and responses to legal changes.

## 8. Continuous Improvement and Feedback

This section of the policy focuses on the AEHDA's commitment to continuous improvement and the establishment of feedback mechanisms for stakeholders to provide valuable insights and suggestions.

### 8.1 Periodic Policy Review

This component emphasizes the importance of regular reviews of policies to ensure they remain current, effective, and aligned with the AEHDA's goals and values.

#### Procedure:

- **Scheduled Policy Reviews:** HAS establishes a schedule for periodic reviews of policies, including this one, to ensure they remain relevant and effective. Reviews are conducted at predetermined intervals or in response to significant organizational changes.
- **Cross-Functional Review Teams:** A cross-functional team, including representatives from relevant departments and stakeholders, is assembled to conduct the policy review. This team may include legal, compliance, and operational personnel.
- **Comparison with Legal and Regulatory Changes:** The policy is compared with any recent changes in relevant laws, regulations, and industry standards to ensure continued compliance.
- **Assessment of Effectiveness:** The team assesses the effectiveness of the policy in achieving its intended objectives. This assessment may include evaluating its impact on operations, compliance levels, and overall organizational performance.
- **Gathering Feedback and Input:** Feedback is solicited from stakeholders, including employees, sub-partners, and other relevant parties, to gather insights on the policy's effectiveness and identify areas for improvement.
- **Recommendations for Revisions:** Based on the review findings and stakeholder feedback, the team proposes revisions or updates to the policy, if necessary.
- **Approval and Implementation of Revisions:** Revised policies are reviewed and approved by relevant authorities within the HAS before being officially implemented.



- **Communication of Changes:** All stakeholders are informed of any revisions to the policy, and the updated version is made readily accessible through various channels.

## 8.2 Feedback Mechanisms and Channels

This component outlines the procedures for establishing effective feedback mechanisms and channels for stakeholders to provide valuable insights and suggestions regarding the AEHDA's policies and operations.

### Procedure:

- **Designated Feedback Channels:** HAS establishes designated channels, such as suggestion boxes, online forms, dedicated email addresses, or feedback sessions, through which stakeholders can provide feedback.
- **Clear Communication of Feedback Process:** HAS communicates the availability of feedback channels to all stakeholders, providing clear instructions on how to submit feedback and what types of input are encouraged.
- **Anonymous Feedback Option:** To encourage open and honest feedback, HAS provides an option for stakeholders to submit feedback anonymously, ensuring confidentiality.
- **Timely Acknowledgement of Feedback:** Acknowledgment of received feedback is provided in a timely manner, along with an indication of when stakeholders can expect a response or action.
- **Review and Evaluation of Feedback:** Feedback received is carefully reviewed and evaluated to identify common themes, concerns, and areas for improvement.
- **Response and Action Plans:** HAS formulates response plans, which may include addressing specific concerns, implementing suggested improvements, or providing explanations for certain policies or practices.
- **Feedback Loop Closure:** HAS communicates the outcomes of the feedback process to stakeholders, including any actions taken as a result of their input.
- **Documentation of Feedback and Actions:** Comprehensive records are maintained to document all feedback received, actions taken in response, and any resulting policy revisions or improvements.

## 9. Record Keeping and Documentation

This section of the policy emphasizes the importance of maintaining accurate and organized records related to sub-partner selection, agreements, compliance, performance, and other aspects of the partnership.

### 9.1 Documentation Requirements

This component outlines the specific types of documentation that must be maintained to ensure transparency, accountability, and compliance with HAS policies.

#### Procedure:

- **Document Types and Categories:** HAS defines the specific types of documents that must be generated, collected, and retained throughout the sub-partner engagement process. This may include pre-award assessments, agreements, financial reports, performance evaluations, and other relevant records.
- **Standardized Document Formats:** HAS establishes standardized formats for each type of document to ensure consistency, clarity, and ease of retrieval.
- **Document Creation and Authorization:** Procedures are in place to ensure that documents are created by authorized personnel and that they accurately reflect the terms, conditions, and activities related to the sub-partner engagement.
- **Document Ownership and Responsibilities:** Clear ownership and responsibilities for the creation, review, approval, and storage of each type of document are assigned to specific roles or individuals within HAS.

### 9.2 Record Retention and Accessibility

This component outlines the procedures for retaining and ensuring the accessibility of records for the required duration, while also safeguarding sensitive information.

#### Procedure:

- **Retention Periods:** HAS establishes specific retention periods for each type of document, taking into consideration legal and regulatory requirements, as well as organizational policies.

- **Storage and Security:** Documents are stored in secure, controlled environments to prevent unauthorized access, loss, damage, or tampering. Physical records may be kept in locked cabinets, while digital records are stored on secure servers.
- **Access Controls and Permissions:** Access to sensitive or confidential documents is restricted to authorized personnel only. Access controls and permissions are implemented to ensure that only individuals with a legitimate need can view or modify specific documents.
- **Backup and Redundancy:** Procedures are in place to regularly back up digital records and maintain redundancy to safeguard against data loss due to unforeseen events, such as technical failures or disasters.
- **Audit Trails and Logs:** Audit trails and logs are maintained to track who accessed, modified, or interacted with documents, providing a clear record of document activity.

*Revised by: Policy Review Committee*  
*Reviewed and Approved by: Board of Director's (BoDs)*