

GRASSROOTS EMPOWERMENT AND LIVELIHOOD INITIATIVE

G E L I

Local Roots. Lasting Impact.

Organisational Policy Manual

Eight core policies governing the work of GELI around the States

Address: Gusau, Zamfara State, Nigeria

Registered with the Corporate Affairs Commission under Part F, Companies and Allied Matters
Act 2020

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Version Control and Approval

This page records the status of the manual. It must be completed before the manual is issued to anyone outside GELI.

Field	Detail
Document title	GELI Organisational Policy Manual
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Prepared by	Prof. Ahmad Sama'ila
Reviewed by	Alh. Sama'il Mudi
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Owner of this manual	Executive Director

NEVER

Do not present this manual, or any policy in it, to a donor, partner or government body as an approved policy until the Board has adopted it and the date of adoption appears above. An unadopted draft described as approved is a due diligence failure in its own right.

Revision history

Version	Date	Change	Approved by
0.1	Sept 2026	First draft prepared from GELI profile, website copy and programme documents	-
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How to Use This Manual

This manual is the single place where GELI writes down how it governs itself. It exists so that every trustee, staff member, facilitator, enumerator, volunteer and contractor working under the GELI name knows what is expected of them, and so that any partner, donor or government body that asks how we are run can be given a straight answer.

GELI works in all fourteen Local Government Areas of Zamfara State, including communities that other organisations cannot reach. Our people work with children, with displaced families, with job seekers and with personal data. That is exactly the kind of work in which rules are not paperwork. They are what protects the people we serve, and what protects the people who serve them.

Structure

The manual contains eight policies. Each one follows the same shape, so you can find what you need quickly:

- Purpose - why the policy exists, in one paragraph.
- Scope - who it applies to and when.
- The rules - numbered clauses, written plainly.
- Responsibilities - who does what.
- Breach - what happens if the policy is broken.
- Review - when the policy is next looked at.

Reading the boxes

Coloured boxes carry fixed meanings throughout this manual. They are not decoration and their meanings do not change:

NEVER

A red box is an absolute prohibition. There is no version of the job in which the thing described is acceptable, and no manager may authorise it.

Status of this manual

These policies take effect on the date the Board of Trustees adopts them, recorded on the version control page. Until that date this document is a draft and must not be shared with partners, donors or government bodies as an approved compliance pack.

Where a clause contains text in square brackets, the information is not yet settled. Annex A lists every outstanding item. The manual should not be issued externally until Annex A is empty.

Where the law comes in

GELI is an incorporated trustee registered with the Corporate Affairs Commission under Part F of the Companies and Allied Matters Act 2020. Several policies in this manual exist because Nigerian law requires them, and those clauses say so. Legal references have been checked against publicly available guidance at the date of drafting, but law changes. The Board should have the manual reviewed by a qualified Nigerian legal practitioner before it is relied upon in any contract or grant agreement.

Policy Register

Eight policies govern GELI. Each has a named owner who is accountable for keeping it current and for answering questions about it.

No.	Policy	Owner	Review cycle
01	Governance and Board Policy	Chair, Board of Trustees	Every 2 years
02	Safeguarding Policy	Safeguarding Focal Point	Every year
03	Code of Conduct	Executive Director	Every 2 years
04	Financial Management Policy	Finance Officer	Every year
05	Data Protection Policy	Data Protection Focal Point	Every year
06	Human Resources and Recruitment Ethics Policy	Executive Director	Every 2 years
07	Whistleblowing and Complaints Policy	Chair, Board of Trustees	Every 2 years
08	Conflict of Interest Policy	Chair, Board of Trustees	Every 2 years

Every person who works for or with GELI signs the declaration at Annex B confirming they have read the Code of Conduct, the Safeguarding Policy and the Data Protection Policy. Trustees and senior staff also complete the conflict of interest declaration at Annex D on appointment and once a year thereafter.

Policy 01 - Governance and Board

Purpose

GELI is not the property of any individual, including its founder. It is a registered body held in trust for the communities of Zamfara State. This policy sets out who holds authority in GELI, how decisions are made, and how the people who hold that authority can be held to account.

Scope

Applies to the Board of Trustees, the Executive Director, and every member of staff exercising delegated authority.

The rules

1. The Board of Trustees

- 1.1** The Board of Trustees is the governing body of GELI and holds ultimate responsibility for the organisation, its funds, its reputation and the safety of the people it serves.
- 1.2** The Board has not fewer than four and not more than nine trustees. At least one trustees is+
` women. At least one trustee is independent of the founder by family, business and financial ties.
- 1.3** Trustees serve a term of three years and may be reappointed once. A trustee may serve a third term only by a recorded resolution of the Board explaining why.
- 1.4** The Board elects a Chair, a Secretary and a Treasurer from among its members. The Chair and the Executive Director must not be the same person.
- 1.5** The Board meets not less than four times a year. Minutes are written, numbered, and kept permanently. Decisions taken between meetings by correspondence are recorded and confirmed at the next meeting.
- 1.6** A meeting is quorate when a simple majority of serving trustees is present. A trustee who is absent from three consecutive meetings without accepted reason is asked to resign.

NOTE

Changes to trustees, to the constitution and to the registered address must be filed with the Corporate Affairs Commission. Annual returns for incorporated trustees are filed between 30 June and 31 December each year and must be accompanied by an audited statement of accounts.

2. What the Board decides and what it delegates

- 2.1** The Board alone may: approve the annual budget and the audited accounts; appoint, suspend or dismiss the Executive Director; approve or amend any policy in this manual; open or close a bank account; accept a grant, contract or donation above [THRESHOLD, e.g. NGN 5,000,000]; dispose of a fixed asset; enter a partnership that commits GELI's name; and take any decision that changes what GELI is for.
- 2.2** All other decisions are delegated to the Executive Director, who runs GELI day to day and reports to the Board.
- 2.3** Delegation is recorded in writing. A person exercising delegated authority may not sub-delegate it further without the Board's approval.

3. Founder and organisation

- 3.1** The founder of GELI may serve as a trustee or as Executive Director, but not as both at the same time, and may not chair the Board while serving as Executive Director.
- 3.2** GELI's assets, bank accounts, registration, brand, curricula, data and relationships belong to the organisation, not to the founder, any trustee or any member of staff.
- 3.3** No trustee, member of staff or their relative may take a personal benefit from GELI beyond approved salary, approved expenses and approved allowances.

NEVER

GELI funds are never held in, or moved through, the personal bank account of a trustee, member of staff, volunteer or relative. Not temporarily, not for convenience.

4. Openness

- 4.1** GELI publishes on its website and on request: what it did, where it worked, how many people it reached, its income by source, and its expenditure by category.
- 4.2** GELI answers a reasonable question about how it is governed from a community member, a partner or a journalist within [14] working days.
- 4.3** GELI does not claim a registration, accreditation, affiliation, partnership or approval it does not hold, and does not describe a request as a decision or a target as an achievement.

Responsibilities

Who	What they are responsible for
Board of Trustees	The organisation as a whole; the decisions reserved at clause 2.1; appointing and overseeing the Executive Director.
Chair	Calling and chairing meetings; ensuring minutes are kept; receiving whistleblowing reports concerning the Executive Director.
Treasurer	Overseeing the financial controls in Policy 04 and presenting the accounts to the Board.
Secretary	Statutory filings with the Corporate Affairs Commission; custody of the minute book and the register of trustees.
Executive Director	Day-to-day management; implementing every policy in this manual; reporting to the Board at every meeting.

Breach

A trustee who breaches this policy may be removed by resolution of the Board in accordance with GELI's constitution. A member of staff who breaches it is dealt with under the disciplinary procedure in Policy 06. Breaches involving money or the safety of a child are also handled under Policy 04 and Policy 02 respectively, and may be reported to the relevant authority.

Review

Reviewed by the Board every two years, and immediately after any change to GELI's constitution or to the Companies and Allied Matters Act provisions governing incorporated trustees.

Policy 02 - Safeguarding

Child protection, and protection from sexual exploitation and abuse (PSEA)

Purpose

GELI teaches displaced and out-of-school children, works in communities under strain, and offers people access to jobs and programmes. Every one of those situations creates a difference in power between a GELI worker and the person in front of them. This policy exists so that no one is harmed by someone acting in GELI's name, and so that anyone who is harmed knows how to say so and is believed.

GELI accepts that safeguarding failures happen in every kind of organisation, including well-run ones. The measure of an organisation is not whether a concern is ever raised. It is what it does when one is.

Scope

Applies to trustees, staff, facilitators, enumerators, volunteers, interns, contractors, consultants, drivers, and anyone else representing GELI, on and off duty where their conduct affects GELI's beneficiaries or reputation. It applies to all GELI programmes and to work delivered on behalf of a partner.

Definitions

Term	Meaning in this policy
Child	Any person under the age of 18, regardless of local practice, marital status or apparent maturity.
Adult at risk	An adult who, because of disability, illness, displacement, destitution or dependence on GELI for assistance, is less able to protect themselves.
Abuse	Physical, sexual, emotional or economic harm, neglect, or exploitation of a person, including through humiliation and degrading punishment.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, power or trust for sexual purposes, including profiting from it.

Term	Meaning in this policy
Safeguarding concern	Any information suggesting a child or adult at risk has been, is being, or may be harmed - whether by a GELI worker or by anyone else.

The rules

1. The absolute prohibitions

These six rules are adopted from the standard core principles on protection from sexual exploitation and abuse used across the humanitarian sector, and are binding without exception:

- 1.1** Sexual activity with a child is prohibited. Belief about the child's age is not a defence. Consent from the child, the child's family or the community is not a defence.
- 1.2** Exchanging money, employment, goods, services, assistance, a place on a programme, a job referral or preferential treatment for sex or sexual favours is prohibited.
- 1.3** Sexual relationships between a GELI worker and a beneficiary are prohibited. They rest on an unequal power dynamic and undermine the credibility of the work.
- 1.4** Any worker who develops a concern or suspicion about abuse or exploitation by a colleague, whether in GELI or in a partner organisation, must report it.
- 1.5** Workers must maintain an environment that prevents exploitation and abuse. Managers at every level are responsible for systems that uphold this.
- 1.6** Any relationship with a beneficiary that could be seen as exploitative, or that creates a conflict, must be declared to the Safeguarding Focal Point.

NEVER

Never be alone with a child out of sight of others. Never take a child to your home or to any private place. Never give your personal phone number, money or gifts to an individual child or their family. Never photograph or film a child without recorded consent. Never use physical punishment, shouting, humiliation or withholding of food or learning as discipline.

2. Safe recruitment

- 2.1** Every role that involves contact with children or adults at risk is treated as a safeguarding-sensitive role and is advertised as such.

- 2.2** No one starts work in such a role until GELI has: verified their identity; verified the qualifications claimed; taken up two references, one of which is asked directly whether the referee has any safeguarding concern; and obtained a signed self-declaration.
- 2.3** A gap in employment history of more than six months is asked about and the answer recorded.
- 2.4** Every worker signs the safeguarding declaration at Annex B before their first day in the field and completes safeguarding induction within their first week.

3. Safe practice in the field

- 3.1** Learning sessions are held in an open space, in daylight where possible, with more than one adult present. Where a second adult is genuinely unavailable, the session is held within sight of the community and the fact is recorded in the register.
- 3.2** Attendance registers are kept for every session and retained.
- 3.3** Facilitators do not transport a child alone in a vehicle or on a motorcycle.
- 3.4** Physical contact is limited to what is necessary, appropriate to the child's age, and never initiated in private.
- 3.5** Stories, songs and examples used in teaching are checked against the story-selection rules in the Facilitator Training Manual. Material touching on violence, abduction, death, or the circumstances of displacement is not used with displaced children.
- 3.6** Photographs of children are taken only with the recorded consent of the child and their parent or guardian, only for a stated purpose, and never with the child's full name, school or location attached. Children are shown clothed, in activity, and with dignity.

4. Reporting a concern

- 4.1** Anyone with a safeguarding concern reports it to the Safeguarding Focal Point, [NAME], on [PHONE] or at safeguarding@geli.org.ng, within 24 hours of becoming aware of it.
- 4.2** If the concern is about the Safeguarding Focal Point or the Executive Director, it goes directly to the Chair of the Board on [PHONE].
- 4.3** The person reporting does not investigate, does not confront the person concerned, and does not discuss the matter with anyone other than those named above.
- 4.4** Reporting is a duty, not a choice. A worker who knew and did not report is treated as having committed misconduct.

4.5 A concern may be reported by a community member, a parent, a child or a partner through any GELI worker, the safeguarding line, or the channels in Policy 07. All routes lead to the same place.

5. What GELI does with a concern

5.1 The immediate safety of the child or adult at risk comes first, before any consideration of GELI's reputation, its relationship with a partner, or the reputation of the person accused.

5.2 The Safeguarding Focal Point records the concern in the safeguarding log within 24 hours and informs the Executive Director and the Chair.

5.3 Where a worker is the subject of the concern, they are suspended from all contact with children and adults at risk while the matter is looked into. Suspension is a neutral protective step, not a finding of guilt.

5.4 GELI refers the matter to the appropriate authority where a criminal offence may have been committed, and supports the survivor in accessing medical, psychosocial and legal help.

5.5 Where GELI is delivering work for a partner, the partner's safeguarding focal point is notified within the timeframe in the engagement agreement, and in any case within 48 hours.

5.6 Records are kept confidentially, separately from personnel files, and shared strictly on a need-to-know basis in line with Policy 05.

NOTE

Zamfara State assented to the Child's Rights Act in 2022. The exact title and citation of the State law, and the correct referral office for child protection cases in Zamfara, must be confirmed and inserted before this policy is issued externally.

Responsibilities

Who	What they are responsible for
Board of Trustees	Approving this policy; receiving a safeguarding report at every Board meeting; commissioning an independent review after any serious incident.

Who	What they are responsible for
Safeguarding Focal Point	Receiving and logging concerns; advising on immediate action; maintaining the safeguarding log; delivering induction and refresher training.
Executive Director	Ensuring safe recruitment, training and supervision across all programmes; deciding suspension; liaison with partners and authorities.
Managers and supervisors	Modelling safe practice; checking that field sessions meet clause 3; escalating without delay.
Every worker	Following the rules; reporting every concern within 24 hours.

Breach

Breach of any clause in section 1 is gross misconduct and leads to dismissal and referral to the authorities. Breach of any other clause is misconduct and is dealt with under Policy 06. Failure to report a concern is itself a disciplinary matter.

Review

Reviewed every year by the Board, and immediately after any serious incident or any change of law.

Policy 03 - Code of Conduct

Purpose

GELI's only real asset is that people in Zamfara trust it. A community that trusts GELI lets its children into a learning centre, tells an enumerator the truth, and takes a job referral seriously. This code sets the standard of behaviour that keeps that trust, and it applies to everyone equally, from a trustee to a first-week facilitator.

Scope

Applies to trustees, staff, facilitators, enumerators, volunteers, interns, consultants and contractors, whenever they are working for GELI or can reasonably be seen to represent it, including on social media.

The rules

1. How we treat people

- 1.1** Treat every person with courtesy and respect, whatever their ethnicity, language, religion, sex, disability, age, displacement status or political opinion.
- 1.2** Do not discriminate in who receives GELI's services. Selection is by published criteria, applied the same way to everyone.
- 1.3** Harassment, bullying, intimidation and sexual harassment are prohibited, whether directed at a colleague, a beneficiary, a partner's staff or a member of the public.
- 1.4** Respect the customs, dress and religious practice of the communities where you work. Do not preach, campaign or recruit for any religion or political party while representing GELI.
- 1.5** Take particular care in how you speak to and about women, children, people with disabilities and displaced families. Do not speak about a beneficiary in a way you would not say in front of them.

2. Honesty

- 2.1** Report what actually happened. Attendance figures, reach numbers, survey responses and monitoring data are recorded as found, never adjusted to meet a target or to please a partner.
- 2.2** Do not promise a beneficiary anything GELI has not committed to, including a job, a place on a programme, a payment or a government benefit.

- 2.3** Do not misrepresent your role, your qualifications or GELI's status to anyone.
- 2.4** Where you make a mistake, say so promptly to your supervisor. GELI treats a mistake reported early far more leniently than one discovered later.

NEVER

Never falsify a register, a receipt, a survey form, a consent record or a report. Data fabrication ends the employment of the person who did it and can end GELI's relationship with a partner permanently.

3. Money, gifts and favours

- 3.1** Do not ask for or accept money, gifts, hospitality, favours or services from a beneficiary, a job applicant, a supplier, a contractor or anyone seeking a decision from GELI.
- 3.2** A gift of nominal value offered as a courtesy and impossible to refuse without causing offence may be accepted on GELI's behalf, declared to your supervisor within five working days, and recorded in the gifts register.
- 3.3** Do not offer or pay a bribe, a facilitation payment or an inducement to any public official, community leader or partner staff member, in any amount, for any reason.
- 3.4** GELI charges employers, never candidates. No worker may take any payment from a job seeker for any reason, including for transport, forms, registration or "processing".

4. Safety, security and substances

- 4.1** Follow the security instructions given for each location. Do not travel to a location that has been stood down, and do not change a movement plan without telling your supervisor.
- 4.2** Do not carry a weapon, and do not travel in an armed vehicle, while working for GELI, except where a partner's security protocol requires it and the Executive Director has approved it in writing.
- 4.3** Do not work under the influence of alcohol or drugs. Do not bring them onto GELI premises or into a community.
- 4.4** Report every security incident, accident and near miss to your supervisor the same day.

5. Information and public voice

- 5.1** Keep confidential everything you learn about beneficiaries, colleagues, partners and GELI's internal affairs. Confidentiality continues after you leave.

- 5.2** Do not speak to the press or post publicly on GELI's behalf unless authorised by the Executive Director.
- 5.3** On your personal social media, do not post photographs of beneficiaries, details of a location or security incident, or anything that identifies a child.
- 5.4** GELI equipment, data, vehicles and airtime are for GELI work.

6. Duty to speak up

- 6.1** If you see a breach of this code, report it under Policy 07. If it concerns a child or an adult at risk, report it under Policy 02 within 24 hours.
- 6.2** GELI will not retaliate against anyone who reports honestly, even where the concern turns out to be unfounded.

Breach

Breach is a disciplinary matter under Policy 06. Bribery, fraud, data fabrication, sexual harassment and any breach of Policy 02 section 1 are gross misconduct and normally lead to summary dismissal and, where the law requires, referral to the authorities.

Review

Reviewed by the Board every two years.

Policy 04 - Financial Management

Purpose

GELI runs on two kinds of money: funds its own management puts in, and funds entrusted to it by partners and donors. Both must be handled the same way. This policy sets the minimum controls that keep GELI's money safe, its books honest, and its accounts capable of surviving an audit or a donor due diligence review.

Scope

Applies to all GELI income and expenditure, in cash and in kind, on every programme and on core operations.

The rules

1. Bank accounts and cash

- 1.1** All GELI funds are held in bank accounts in GELI's registered name. Accounts are opened and closed only by resolution of the Board.
- 1.2** Every payment requires two authorised signatories. One signatory must be a trustee. No person may authorise a payment to themselves.
- 1.3** Payments are made by bank transfer wherever a transfer is possible. Cash payment is the exception, not the norm.
- 1.4** A petty cash float of not more than [NGN 100,000] is held by a named custodian, reconciled weekly, and counted monthly by someone other than the custodian. Single cash payments above [NGN 50,000] require the Executive Director's written approval in advance.
- 1.5** Field cash advances are issued against a written request, retired with receipts within seven days of return, and no second advance is issued to a person with an unretired first advance.

NEVER

Never hold GELI money in a personal account. Never make a payment on a verbal instruction alone. Never sign a blank cheque or a blank payment voucher. Never pay a supplier without a document showing what was bought.

2. Authorisation limits

Amount (NGN)	Approved by	Documents required
Up to [100,000]	Line manager	Payment voucher, receipt
[100,001] to [1,000,000]	Executive Director	Voucher, receipt, three quotations
[1,000,001] to [5,000,000]	Executive Director and Treasurer	As above plus written contract
Above [5,000,000]	Board resolution	As above plus recorded Board minute

These thresholds are indicative and must be set by the Board to match GELI's actual turnover before this policy is adopted.

3. Procurement

- 3.1** Purchases are made on value for money, not on relationship. Three written quotations are obtained for any purchase above [NGN 100,000].
- 3.2** The person who selects a supplier is not the person who receives the goods and is not the person who pays.
- 3.3** A supplier connected to a trustee or member of staff may be used only where the connection has been declared under Policy 08, the connected person took no part in the decision, and the Board recorded its approval.
- 3.4** Where a partner's procurement rules are stricter than GELI's, the partner's rules apply to that partner's funds.

4. Records and reporting

- 4.1** Every transaction is recorded in the accounting records within five working days, with a supporting document.
- 4.2** Bank accounts are reconciled monthly and the reconciliation is reviewed and signed by someone other than the person who prepared it.
- 4.3** Financial records, vouchers and supporting documents are kept for not less than six years, and for longer where a donor agreement requires it.
- 4.4** The Executive Director presents management accounts to the Board at each meeting, showing budget against actual.
- 4.5** Funds received for a stated purpose are spent only on that purpose and are tracked separately.

5. Statutory compliance

- 5.1** GELI's accounts are audited each year by an independent qualified auditor appointed by the Board. The auditor is not connected to any trustee or member of staff.
- 5.2** Annual returns, with the audited statement of accounts, are filed with the Corporate Affairs Commission within the statutory window each year.
- 5.3** GELI registers with the Special Control Unit Against Money Laundering (SCUML) and files the transaction and activity reports required of designated non-financial institutions.
- 5.4** GELI deducts and remits Pay As You Earn tax and any applicable withholding tax and pension contributions on time.
- 5.5** GELI verifies the source of any donation above [NGN 1,000,000] and of any donation from an unfamiliar source, and declines any funding it cannot trace or that would compromise its independence or its communities.

6. Fraud

- 6.1** GELI has no tolerance for fraud, theft, or the misuse of funds, however small the sum.
- 6.2** Any suspicion of fraud is reported immediately to the Executive Director, or to the Chair where the Executive Director may be involved, and is handled under Policy 07.
- 6.3** A person suspected of fraud is suspended from financial duties while the matter is examined. GELI pursues recovery of lost funds and reports the matter to the police where the evidence supports it.

Responsibilities

Who	What they are responsible for
Board of Trustees	Approving the budget, the accounts and the auditor; setting authorisation limits; approving any connected-party transaction.
Treasurer	Overseeing controls; reviewing monthly reconciliations; presenting the accounts.
Executive Director	Operating within budget and delegated limits; presenting management accounts; approving procurement within limit.
Finance Officer	Recording transactions; preparing reconciliations and reports; safeguarding documents; maintaining the fixed asset register.

Who	What they are responsible for
Budget holders	Spending only what is approved, only on what it was approved for, and retiring advances on time.

Breach

Breach is a disciplinary matter under Policy 06. Fraud, theft and the falsification of financial records are gross misconduct leading to dismissal, recovery action and referral to the police.

Review

Reviewed every year by the Board alongside the audited accounts.

Policy 05 - Data Protection

Purpose

GELI collects a great deal of personal information: children's names and ages, household details of displaced families, survey responses, job applicants' records, and in the planned skills register, thousands of individual profiles. In Zamfara, a list of names in the wrong hands is not an administrative problem. This policy sets out how GELI collects, holds, uses and disposes of personal data, and what rights the people in that data have.

Scope

Applies to all personal data GELI processes, in any form, on paper or digitally, on GELI programmes and on work delivered for partners. It applies to every worker and to any contractor processing data on GELI's behalf.

The rules

1. Principles

GELI applies the principles of the Nigeria Data Protection Act 2023 to all its processing:

- 1.1** Collect personal data fairly, lawfully and transparently. The person must know who is collecting, why, and what will happen to it.
- 1.2** Collect it for a specific stated purpose and do not use it for a different purpose later without going back for permission.
- 1.3** Collect the minimum needed. If the programme does not need a phone number, do not ask for one.
- 1.4** Keep it accurate and up to date.
- 1.5** Keep it only as long as needed, then destroy it securely.
- 1.6** Keep it secure against loss, theft and unauthorised access.
- 1.7** Be able to demonstrate all of the above. Undocumented compliance is not compliance.

2. Consent

- 2.1** Consent is obtained before personal data is collected, in a language the person understands, and is recorded.
- 2.2** Consent must be freely given. Access to a GELI service is never conditional on agreeing to data use that the service does not require.

- 2.3** For a child, consent is given by the parent or guardian, and the child is told in simple words what is happening. Where a displaced child has no identified guardian, the position is recorded and the Safeguarding Focal Point is consulted before the child's data is used beyond the attendance register.
- 2.4** Consent may be withdrawn at any time, and withdrawal must be as easy as giving it.
- 2.5** Hausa-language consent scripts are used where Hausa is the working language, and must be reviewed by a native speaker before field use.

3. Special categories

- 3.1** Extra care applies to data revealing health, disability, religion, ethnicity, political opinion, biometric identifiers, and to all data about children and displaced persons.
- 3.2** Data that could identify a person as displaced, as a survivor of an attack, or as a survivor of abuse is treated as high risk. It is stored separately, encrypted, and accessible only to named individuals.

NEVER

Never share a list of beneficiary names, locations or household details with anyone outside GELI without written authorisation from the Data Protection Focal Point. Never carry unencrypted beneficiary data through a checkpoint or an insecure area. Never send personal data over a personal WhatsApp account or personal email.

4. Security

- 4.1** Devices holding personal data are password-protected and encrypted. Paper records are kept in a locked cabinet in a locked room.
- 4.2** Access is granted on a need-to-know basis and removed the day a person leaves or changes role.
- 4.3** Personal data is transferred only through GELI-approved systems and accounts.
- 4.4** Field data collected on paper is transferred to the secure system and the paper original is stored securely or destroyed, as the retention schedule requires.
- 4.5** Backups are taken [WEEKLY] and stored separately from the working copy.

5. Rights of the people in our data

Any person whose data GELI holds may ask to see it, ask for it to be corrected, ask for it to be deleted, withdraw consent, or object to how it is being used. Requests go to the Data Protection Focal Point and are answered within [30] days. There is no charge.

6. Breaches

- 6.1** A data breach is any loss, theft, unauthorised access to or accidental disclosure of personal data, including a lost phone, a misdirected email or a stolen register.
- 6.2** Report a suspected breach to the Data Protection Focal Point immediately and in any case within 24 hours. Do not wait until you are certain.
- 6.3** The Data Protection Focal Point assesses the risk to the people affected, takes containment action, records the breach in the breach log, and where the breach is likely to cause them harm, notifies the Nigeria Data Protection Commission within 72 hours and informs the people affected.
- 6.4** Where the breach concerns a child or a displaced person, the Safeguarding Focal Point is informed at the same time and the immediate physical safety of those affected is assessed first.

7. Registration and accountability

- 7.1** GELI appoints a named Data Protection Focal Point, [NAME], responsible for this policy.
- 7.2** GELI keeps a record of its processing activities: what data, why, where it is held, who can see it, how long it is kept.
- 7.3** GELI registers with the Nigeria Data Protection Commission as a data controller of major importance, and files the annual compliance audit return where the thresholds apply to it.
- 7.4** Any contractor or partner processing personal data on GELI's behalf does so under a written agreement imposing these standards.

NOTE

The NDPC Guidance Notice of 14 February 2024 treats an organisation that processes the personal data of more than 200 data subjects in six months as a data controller of major importance, which triggers registration. GELI will cross that threshold in a single LGA. Registration is therefore not optional and should be treated as an immediate action, not a future one. Confirm current fees, tier and filing deadlines on the NDPC portal at the time of filing.

Breach

Breach of this policy is a disciplinary matter under Policy 06. Deliberately disclosing beneficiary data outside GELI, or selling or trading personal data, is gross misconduct and may also be a criminal offence.

Review

Reviewed every year, and immediately on any change to the Nigeria Data Protection Act or NDPC guidance.

Policy 06 - Human Resources and Recruitment Ethics

Purpose

GELI exists in part to create dignified employment for the people of Zamfara, and it sells recruitment services to employers. It cannot credibly do either while treating its own people poorly or running an opaque hiring process. This policy covers how GELI recruits and manages its own workforce, and the ethical rules that govern the recruitment services it provides to others.

Scope

Part A applies to everyone employed or engaged by GELI. Part B applies to GELI's Talent Sourcing and Recruitment Support service line and to everyone who works on it.

Part A - GELI as an employer

1. Recruitment into GELI

- 1.1** Every position is advertised, with a written job description, the required qualifications, the location and the terms. Positions are advertised across all fourteen LGAs so that opportunity is not concentrated in Gusau.
- 1.2** Selection is on merit against the published criteria, by a panel of not fewer than two people, with written scores retained.
- 1.3** A panel member who is related to or otherwise connected with a candidate declares it under Policy 08 and withdraws from the panel.
- 1.4** GELI actively seeks women candidates and candidates with disabilities and, where two candidates are equally qualified, may appoint the one from the group under-represented in that team.
- 1.5** Appointments are subject to the safe recruitment checks in Policy 02 section 2 and to a written contract signed before the first day of work.

NEVER

Never accept money, a gift or a favour from a person seeking work with GELI. Never appoint a relative to a GELI position without an open advertisement, a properly constituted panel from which you are absent, and a recorded Board decision.

2. Terms and treatment

- 2.1** Every worker receives a written contract stating role, reporting line, location, pay, hours, leave and notice period, in a language they understand.
- 2.2** Pay is not less than the national minimum wage and is paid in full, on time, to the worker's own bank account. Deductions are only those required by law or agreed in writing.
- 2.3** Statutory leave, including annual leave, sick leave and maternity leave, is granted in accordance with Nigerian law.
- 2.4** GELI does not use forced labour, does not employ children, and does not permit unpaid work described as a volunteer role where the work is in substance a job.
- 2.5** Volunteers and interns receive a written agreement, an induction, a named supervisor, and reimbursement of agreed expenses. They are covered by every policy in this manual.
- 2.6** Workers deployed to insecure locations receive a security briefing before travel, a means of communication, and the right to decline or withdraw from a deployment they judge unsafe without penalty.

3. Managing performance and conduct

- 3.1** Every worker has a named supervisor, an induction within the first week, and a performance conversation at least twice a year.
- 3.2** Where performance falls short, the worker is told plainly, given clear objectives and a reasonable period to improve, and offered support.
- 3.3** Disciplinary matters follow a fair procedure: the allegation in writing; a reasonable time to prepare; a hearing at which the worker may be accompanied; a decision in writing with reasons; and a right of appeal to a person not involved in the original decision.
- 3.4** Sanctions are: verbal warning, written warning, final written warning, dismissal. Gross misconduct may lead to dismissal without prior warnings.
- 3.5** Gross misconduct includes any breach of Policy 02 section 1, fraud, theft, bribery, data fabrication, deliberate disclosure of beneficiary data, violence, and working under the influence of alcohol or drugs.
- 3.6** A grievance about treatment at work is raised with the supervisor, or with the Executive Director where the supervisor is the subject, and is answered in writing within [14] working days.

4. Leaving

- 4.1** On leaving, a worker returns all GELI property, data and records, and their access to GELI systems is removed the same day.
- 4.2** Confidentiality and data protection obligations continue after employment ends.
- 4.3** GELI provides a factual reference. Where GELI has upheld a safeguarding finding against a former worker, that fact is disclosed in response to a safeguarding reference request.

Part B - Recruitment services for employers

5. The candidate never pays

- 5.1** GELI charges the employer. GELI does not charge candidates, and does not accept payment, gifts or favours from a candidate or their family, for any reason, at any stage, including after placement.
- 5.2** Every advertisement and every candidate communication states plainly that GELI's service is free to candidates and that no GELI worker may ask for money.
- 5.3** A worker who solicits or accepts payment from a candidate is dismissed and reported to the authorities where the conduct amounts to an offence.

6. Honest recruitment

- 6.1** GELI advertises only genuine vacancies from identified employers whose existence it has verified.
- 6.2** Advertisements state the employer or, where the employer requires confidentiality, the sector, the location, the pay range and the terms. GELI does not advertise a role whose terms it has not seen.
- 6.3** Shortlisting is on the published criteria alone. Records of screening decisions are kept for [12] months.
- 6.4** GELI verifies certificates and references at source before recommending a candidate, and tells the employer plainly what it was and was not able to verify.
- 6.5** GELI does not promise any candidate a job, a shortlisting or a favourable outcome.
- 6.6** Candidate data is processed under Policy 05, shared only with the employer the candidate applied to, and only with the candidate's consent.

7. Work GELI will not take

- 7.1** GELI declines a recruitment engagement where the role appears unlawful or unsafe; where the employer will not disclose terms; where there are indicators of trafficking, bonded labour or exploitative overseas placement; where a fee would fall on the

candidate; or where the employer requires discrimination on grounds unrelated to the job.

7.2 Concerns of this kind are escalated to the Executive Director, who decides whether to decline and whether to report the employer.

Breach

Breach is a disciplinary matter. Breach of clause 5.1 is gross misconduct without exception.

Review

Reviewed by the Board every two years, or on any change to Nigerian labour or recruitment law.

Policy 07 - Whistleblowing and Complaints

Purpose

Things go wrong in every organisation. What separates a well-run one is that people inside it, and the communities it serves, can say so without fear and be taken seriously. This policy gives two routes: one for workers raising a concern about wrongdoing, and one for beneficiaries and the public making a complaint.

Scope

Part A applies to trustees, staff, volunteers, contractors and partner staff. Part B applies to beneficiaries, their families, community members, partners and any member of the public.

Part A - Whistleblowing

1. What to report

Report anything you honestly believe shows:

- harm or risk of harm to a child or adult at risk;
- sexual exploitation, abuse or harassment;
- fraud, theft, bribery or misuse of GELI or donor funds;
- falsification of data, registers, receipts or reports;
- a breach of the law or of any policy in this manual;
- a danger to the health or safety of any person;
- an attempt to conceal any of the above.

1.1 You do not need proof. You need an honest belief. Investigating is not your job.

1.2 Raising a concern that turns out to be mistaken carries no consequence, provided it was raised honestly. Knowingly making a false allegation is misconduct.

2. How to report

If the concern is about...	Report to
A child or adult at risk	Safeguarding Focal Point, [NAME], [PHONE], safeguarding@geli.org.ng - within 24 hours
Any other matter	Your line manager, or the Executive Director
Your line manager	The Executive Director

If the concern is about...	Report to
The Executive Director, or money	The Chair of the Board of Trustees
The Board, or the founder	The independent trustee

2.1 Reports may be made in writing, by phone, in person, in English or in Hausa.

2.2 You may report anonymously. GELI will act on an anonymous report, but it is harder to look into and impossible to give you feedback on, so giving your name is encouraged.

3. Protection for the person reporting

3.1 GELI does not tolerate retaliation of any kind against a person who raises a concern honestly. Retaliation includes dismissal, demotion, exclusion from deployment, withholding of pay, threat, isolation and pressure from colleagues.

3.2 Retaliation is gross misconduct.

3.3 The identity of the person reporting is kept confidential and disclosed only where the law requires it or where it is unavoidable in a proper process, and then only after telling them.

3.4 Where a person believes they are being retaliated against, they report it directly to the Chair.

NOTE

Retaliation is the single reason people stop reporting. It rarely looks like a formal punishment. It looks like being left off the next deployment list. Managers should be aware that this is how it usually appears.

4. What happens next

4.1 The report is acknowledged within [3] working days and recorded in the concerns register.

4.2 The recipient decides whether the matter is safeguarding (Policy 02), financial (Policy 04), data (Policy 05), conduct (Policy 03) or a combination, and handles it accordingly.

4.3 The person examining the matter has no involvement in it and no relationship with those concerned.

- 4.4** The person who raised the concern is told the outcome in general terms within [30] working days, or told why more time is needed.
- 4.5** A summary of all concerns raised and how they were resolved goes to the Board at every meeting, with identities withheld.

Part B - Complaints from communities and the public

5. The right to complain

- 5.1** Anyone may complain about GELI's work, its staff, its selection decisions or its conduct. Complaining never affects a person's access to GELI services.
- 5.2** At every GELI activity site, the complaints channels are displayed on a poster in Hausa and English, and are explained aloud at the start of any programme.
- 5.3** Complaints may be made in person to any GELI worker, by phone on [COMPLAINTS LINE], by message, by email to info@geli.org.ng, or through a community leader or the LGA focal point.
- 5.4** A worker who receives a complaint records it and passes it to the Executive Director within [3] working days. A worker may not dismiss a complaint themselves, and may not handle a complaint about their own conduct.
- 5.5** A complaint involving a child, or any suggestion of sexual exploitation or abuse, goes straight to the Safeguarding Focal Point within 24 hours and is not handled as a routine complaint.
- 5.6** Complaints are acknowledged within [5] working days and answered within [30] days. The complainant is told what GELI decided and what it will do.
- 5.7** A complainant who is not satisfied may ask the Chair of the Board to review the decision.
- 5.8** Every complaint and its outcome is logged. The log is reviewed by the Board at every meeting to identify patterns.

Breach

Suppressing a concern or complaint, discouraging someone from raising one, or retaliating against someone who did, is gross misconduct.

Review

Reviewed by the Board every two years.

Policy 08 - Conflict of Interest

Purpose

GELI works in a state where almost everyone in a given LGA is connected to almost everyone else. Connection is not the problem, and pretending it does not exist is not the answer. Undeclared connection is the problem. This policy sets out how GELI declares connections and manages them so that decisions are made, and are seen to be made, on merit.

Scope

Applies to trustees, staff, volunteers, consultants and anyone taking part in a GELI selection, recruitment, procurement or funding decision.

Definition

A conflict of interest arises where your personal, family, financial, political, religious or community interest could influence, or could reasonably appear to influence, a decision you take on GELI's behalf. Appearance counts. A decision that was in fact fair but looks bought does the same damage as one that was bought.

The rules

1. Common situations

Declare, at least, where:

- a candidate, beneficiary, supplier or partner is your relative, in-law, close friend or neighbour;
- you, or a relative, have a financial interest in a supplier, contractor or partner GELI deals with;
- you hold office in, or are a candidate for, a political party, or hold a traditional or religious office in a community where GELI works;
- you hold a paid or unpaid role in another organisation GELI works with, funds, or competes with;
- you have been offered a gift, hospitality or a favour by someone seeking a decision from GELI;
- you are asked to select beneficiaries in your own community;
- you would gain personally, directly or indirectly, from a decision you are part of.

2. Declaring

- 2.1** Trustees and senior staff complete the declaration at Annex D on appointment and again every year.
- 2.2** Anyone joining a selection, recruitment or procurement panel declares any interest before the panel begins its work.
- 2.3** A new conflict is declared as soon as it arises, in writing, to your supervisor, or to the Chair where you are a trustee or the Executive Director.
- 2.4** If you are unsure whether something counts, declare it. Declaring is free. Failing to declare is not.
- 2.5** GELI keeps a register of interests. It is reviewed by the Board every year and is open to any donor or auditor who asks.

3. Managing a declared conflict

Once declared, the decision-maker chooses the lightest measure that protects the decision:

Measure	When it is used
Record only	The interest is remote and could not reasonably influence the decision.
Take no part in the discussion	The interest is real but the decision is collective and can be taken without you.
Leave the room and the record	The interest is direct. You withdraw for that item; the minute records that you did.
Hand the decision over	The interest is direct and the decision is yours alone. It passes to someone with no interest.
Decline the transaction	The conflict cannot be managed, or managing it would not be credible to an observer.

- 3.1** A conflicted person does not take part in the decision, does not vote on it, does not sit in the discussion where they have withdrawn, and does not lobby those who do decide.
- 3.2** A transaction with a connected party proceeds only where the connection was declared in advance, the connected person took no part, the terms are demonstrably at market rate, and the Board recorded its approval and its reasons.

NEVER

Never sit on a panel selecting your own relative. Never award GELI work to a business you or your relative owns without a recorded Board approval. Never select beneficiaries for a programme in your own household or extended family.

4. Community selection

- 4.1** Beneficiary selection uses published criteria, is carried out with community representatives and not by a GELI worker alone, and the resulting list is read aloud or displayed in the community.
- 4.2** Where a GELI worker is from the community being selected, a second worker from outside it takes part in the selection.
- 4.3** Anyone who believes a selection was unfair may complain under Policy 07.

Breach

Failing to declare a conflict, or taking part in a decision from which you were required to withdraw, is misconduct. Where the undeclared conflict produced a personal financial benefit, it is gross misconduct and may be treated as fraud under Policy 04.

Review

Reviewed by the Board every two years, and the register of interests reviewed every year.

Annex A - Before This Manual Is Adopted

This manual is drafted from GELI's existing profile, website copy, programme documents and internal briefing material. The following items were not available at drafting and must be settled by the Board before the manual is adopted or shown to any partner. Nothing in this list has been invented or assumed.

Names and appointments

Item	Needed for
CAC registration number	Cover page, all policies, every external document
HQ street address in Gusau	Cover page and contact details
Names and terms of all trustees	Policy 01; register of trustees
Which trustee is the independent trustee	Policy 01 clause 1.2; Policy 07 escalation route
Named Safeguarding Focal Point and their phone number	Policy 02; Policy 07
Named Data Protection Focal Point	Policy 05
Chair's direct phone number for escalation	Policy 07
Dedicated complaints phone line	Policy 07 clause 5.3
Name of the appointed external auditor	Policy 04 clause 5.1

Figures the Board must set

Item	Where it appears
Board approval threshold for accepting a grant or contract	Policy 01 clause 2.1
Petty cash float ceiling and single cash payment ceiling	Policy 04 clause 1.4

Item	Where it appears
The four authorisation limits in the approval table	Policy 04 section 2
Quotation threshold for procurement	Policy 04 clause 3.1
Donation verification threshold	Policy 04 clause 5.5
Response times: governance queries, grievances, complaints, concerns	Policies 01, 05, 06, 07
Backup frequency and candidate record retention period	Policies 05 and 06

Verification required

- The exact title and citation of the Zamfara State child rights law, and the correct child protection referral office in the State, for Policy 02.
- Confirmation of GELI's SCUML registration status and the current reporting format, for Policy 04.
- Confirmation of GELI's NDPC registration status, tier and fee, for Policy 05. GELI will cross the registration threshold in its first LGA of the skills register, so this should be treated as immediate.
- Native-speaker review of the Hausa consent script referred to in Policy 05 clause 2.5, and of the Hausa complaints poster in Policy 07 clause 5.2.
- Review of the whole manual by a qualified Nigerian legal practitioner before it is relied on in any contract or grant agreement.

Annex B - Declaration of Understanding

Every trustee, member of staff, facilitator, enumerator, volunteer, intern, consultant and contractor completes this form before starting work with GELI, and again each year.

To be signed and returned to the Executive Director. A copy is kept on the personnel file.

Full name	
Role	
LGA / location	
Date of induction	

I confirm that:

- I have read, or had read and explained to me in a language I understand, the GELI Code of Conduct (Policy 03), the Safeguarding Policy (Policy 02) and the Data Protection Policy (Policy 05).
- I understand the six absolute prohibitions in Policy 02 section 1 and that breaching any of them will end my engagement with GELI and may be reported to the authorities.
- I understand I must report any safeguarding concern within 24 hours, and that failing to report is itself misconduct.
- I understand I must never ask for or accept money, gifts or favours from a beneficiary, a job applicant or anyone seeking a decision from GELI.
- I understand I must keep beneficiary information confidential, during and after my engagement.
- I know how to raise a concern, and I know I will not be punished for raising one honestly.
- I have never been the subject of an upheld finding of abuse, exploitation or harassment, and I am not the subject of any current investigation of that kind. [Where this is not the case, give details on a separate sheet.]

Signature	
Date	
Received by (name and role)	

Annex C - Concern and Complaint Report Form

Use this form to record a safeguarding concern, a whistleblowing report or a community complaint. Complete it as soon as possible, in your own words. Do not investigate. Do not discuss it with anyone other than the person you are sending it to.

NEVER

Never delay sending this form because it is incomplete. A safeguarding concern goes to the Safeguarding Focal Point within 24 hours, complete or not.

Date and time of report	
Your name and role (or "anonymous")	
Your contact details	
Date, time and place of the incident	
Who is affected (name, age, sex, LGA - if known)	
Who else was present	

What happened. Write what you saw or were told, in the words used. Separate clearly what you observed yourself from what you were told by someone else. Do not add your opinion of whether it is true.

What action, if any, has already been taken:

Signature	
Sent to	
Date and time sent	
Received by / log reference	

Annex D - Declaration of Interests

Completed by every trustee and every member of senior staff on appointment and again each year, and by any panel member before a selection, recruitment or procurement decision. Returned to the Chair of the Board and entered in the register of interests.

Full name	
Role in GELI	
Period covered	

Declare each of the following. Where you have nothing to declare under a heading, write "None".

Interest	Details
Employment or paid work outside GELI	
Directorships, ownership or financial interest in any business	
Role in any other NGO, association or community organisation	
Political party office or candidacy; traditional or religious office	
Relatives or close associates employed by, working with, supplying to or benefiting from GELI	
Relatives or close associates in a partner, donor or government body GELI deals with	
Gifts or hospitality offered to you in connection with GELI in the past year	

Interest	Details
Any other interest that could appear to affect your judgement	

I confirm that the above is complete and accurate, and I undertake to declare any new interest as soon as it arises.

Signature	
Date	
Entered in register by	