



GAMWORKS

GAMBIAN AGENCY FOR THE MANAGEMENT
OF PUBLIC WORKS

FINANCE & ADMINISTRATION MANUAL

FIDUCIARY MANUAL SUITE • VOLUME I



UPDATED WITH THE SUPPORT OF
UNIDO



OCTOBER 2026



Table of Contents

Document Control.....	4
Preface by Management.....	6
List of Acronyms.....	7
List of Tables.....	8
Glossary of Terms.....	II
How to Use this Manual.....	13
PART I: INTRODUCTION AND GOVERNANCE.....	14
1.1 Introduction, Purpose and Scope.....	14
1.2 Governance and Institutional Framework.....	16
PART II: FINANCIAL MANAGEMENT.....	24
2.1 Accounting Policies and Financial Reporting.....	24
2.2 Budgeting and Management Accounting.....	28
2.3 Treasury and Cash Management.....	31
2.4 Internal Controls and Segregation of Duties.....	40
2.5 Development Partner-Financed Project and DMC Financial Management.....	45
2.6 Revenue Management.....	48
PART III: GENERAL ADMINISTRATION, HUMAN RESOURCES AND CAPACITY DEVELOPMENT.	51
3.1 General Administration, Asset Custody, Fleet and Office Operations.....	51
3.2 Human Resources and Payroll Administration.....	59
3.3 Capacity Development, Training and Competency Framework.....	67
3.4 Records Management, Document Retention and Public Disclosure.....	76
PART IV: INTEGRITY, ETHICS AND ANTI-MONEY LAUNDERING.....	80
4.1 Code of Ethics and Conflict of Interest.....	80
4.2 Anti-Money Laundering, Countering the Financing of Terrorism and Sanctions Screening.....	85
4.3 Integrity and Whistleblower Protection Framework.....	89
PART V: SYSTEMS AND OVERSIGHT.....	95
5.1 IT Systems and Financial Software.....	95
5.2 Administrative and Financial Interface with Internal Audit.....	98
5.3 Institutional Risk Management.....	101
5.4 Business Continuity, Cybersecurity and Data Protection.....	102
5.5 Compliance Monitoring and Capacity Building.....	104
PART VI: SCOPE BOUNDARY WITH THE TECHNICAL MANUAL OF PROCEDURES.....	107
6.1 Cross-References to the Technical Manual of Procedures.....	107



ANNEXES..... 109





GAMWORKS

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PART

I

INTRODUCTION & GOVERNANCE



Document Control

Document Title	Finance and Administration Manual
Document Owner	GAMWORKS Finance and Administration Department
Updated With the Support of	UNIDO
Supersedes	Finance and Administration Manual (December 2005)
Approval Authority	GAMWORKS Board of Directors
Classification	Internal
Nature of this Document	This is a GAMWORKS institutional manual. GAMWORKS was established with the support of the World Bank (IDA), and this Manual draws on IDA's fiduciary standards for procurement and financial management as a foundational reference, alongside other international, regional and national standards cited section by section. Reference to any such standard does not constitute a claim of accreditation, certification or endorsement by that standard-setting body.
Structure	One of two GAMWORKS manuals, in line with the AGETIP model: this Manual, and the Technical Manual of Procedures (Project Cycle Management for development partner-financed projects and Delegated Management Contracts (DMCs), project and DMC related procurement, grant award and implementation, and the institutional ESMS, Gender Policy, SEAH Prevention Policy, Prohibited Practices framework and GRM integration points)
Related Documents	Internal Audit Charter; Risk-Based Audit Plan 2026; Technical Manual of Procedures
Document No.	-----
Date	October 2026
Approval Date	-----
Effective Date	-----
Next Review Date	Three years from the Effective Date, per the Review Cycle below
Board Resolution Ref.	-----
Document Custodian	Finance and Administration Director
Controlled Distribution	Issued by the Document Custodian to the roles on the Distribution List below, in electronic or hard copy



Amendment History

Edition	Date	Summary of Change	Approved By
2005	December 2005	Finance and Administration Manual issued in Modules A to I	Board of Directors
2026	2026	Comprehensive revision of financial management, administration, human resources, integrity and oversight procedures, aligned with the GAMWORKS Staff Service Rules and international fiduciary standards	----- —

Distribution List

- GAMWORKS Board of Directors
- Director General
- Technical Director
- Finance and Administration Director
- Head of Internal Audit

Review Cycle

This Manual shall be reviewed at least once every three years, or earlier where required by changes in GAMWORKS' operations, applicable law, or Board direction.



Preface by Management

This Finance and Administration Manual sets out, in one place, how GAMWORKS manages its money, its people, its assets and its integrity obligations. It is the Agency's single institutional reference for these functions, read alongside the Technical Manual of Procedures, the Internal Audit Charter and the Risk-Based Audit Plan.

The Manual is written to be used, not filed away. Every Director, Manager and member of staff is expected to know the sections of this Manual that apply to their role, to follow the procedures and controls it sets out, and to raise any matter it does not clearly address with the Finance and Administration Department. Adherence to this Manual is not optional: it is how GAMWORKS demonstrates, to the Board, to development partners, and to the Ministries, Departments and Agencies with whom it holds Delegated Management Contracts, that public and development partner resources are managed with integrity and sound judgement.

This Manual reflects how GAMWORKS actually operates. Its controls have been built around the Agency's real structure, its real systems, and the practical realities of managing both development partner-financed projects and Delegated Management Contracts alongside institutional own-source activity. Management is committed to keeping it that way through the periodic review set out on the preceding page, so that this Manual remains a living description of GAMWORKS' practice rather than a document that falls out of date.

Management thanks every Department and every member of staff who contributed to its development, and looks to each of them to uphold it.

Signature: _____

Name: Omar Gaye

Title: Director General

Date: _____



List of Acronyms

Acronym	Meaning
AfDB	African Development Bank
AGETIP	Agence d'Exécution des Travaux d'Intérêt Public
AGM	Annual General Meeting
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
BADEA	Arab Bank for Economic Development in Africa
CIPD	Chartered Institute of Personnel and Development
COSO	Committee of Sponsoring Organizations of the Treadway Commission
DG	Director General
DMC	Delegated Management Contract
ESMS	Environmental and Social Management System
FATF	Financial Action Task Force
FIDIC	Fédération Internationale des Ingénieurs-Conseils
GAMWORKS	Gambian Agency for the Management of Public Works
GMD	Gambian Dalasi
GOTG	Government of The Gambia
GPPA	Gambia Public Procurement Authority
GRA	Gambia Revenue Authority
GRM	Grievance Redress Mechanism
HR	Human Resources
IAC	Internal Audit Charter
IDA	International Development Association
IFRS	International Financial Reporting Standards
IIA	Institute of Internal Auditors
IPSAS	International Public Sector Accounting Standards
ISA	International Standards on Auditing
ISO	International Organization for Standardization
IT	Information Technology

Acronym	Meaning
MDA	Ministry, Department or Agency
PAYE	Pay As You Earn
PEFA	Public Expenditure and Financial Accountability
PEP	Politically Exposed Person
PIP	Performance Improvement Plan
PMR	Project Management Report
PPP	Public-Private Partnership
QAIP	Quality Assurance and Improvement Programme
RBAP	Risk-Based Audit Plan
SEAH	Sexual Exploitation, Abuse and Harassment
SSHFC	Social Security and Housing Finance Corporation
TMoP	Technical Manual of Procedures
UN	United Nations
UNIDO	United Nations Industrial Development Organization

List of Tables

Table	Title
Table 1	Visual Convention Guide
Table 2	GAMWORKS Governance Levels and Reporting Lines
Table 3	Recurring Coordination Points
Table 3a	Accounting Bases
Table 4	Audit Finding Escalation Process
Table 5	External Audit Cycle
Table 6	Three-Stage Budget Estimate
Table 7	Management Accounting Reports
Table 8	Opening a Special or Counterpart Account
Table 9	Bank Reconciliation and Review
Table 10	Petty Cash Replenishment

Table	Title
Table 10a	Types of Imprest and Retirement Deadlines
Table 10b	Issue and Retirement of an Imprest
Table 11	Special Account Replenishment
Table 12	Segregation of Duties by Transaction Type
Table 13	Expenditure Approval
Table 14	Procurement Threshold Decision Guide
Table 15	Annual Fixed Asset Verification
Table 16	Development Partner/DMC Financial Report Submission
Table 17	Quarterly Project Account Reconciliation
Table 18	Project/DMC Closure
Table 19	Asset Assignment on Acquisition
Table 20	Institutional Procurement Method Thresholds
Table 21	Institutional Purchase Process
Table 21a	Minimum Procurement File Contents
Table 22	Vehicle Trip Authorisation and Fuel Management
Table 23	Physical Security Measures by Area
Table 24	Asset Labelling on Acquisition
Table 25	Recruitment Approval and Selection Panel Tiers
Table 26	Recruitment and Selection Process
Table 27	Cascading Ownership of Strategic Plan Objectives
Table 28	Annual Performance Management Calendar
Table 29	Performance Management Cycle
Table 30	GAMWORKS Performance Rating Scale
Table 31	Monthly Payroll Processing Cycle
Table 32	Statutory Payroll Remittance
Table 33	Payroll Change Authorisation
Table 34	Monthly Payroll Reconciliation
Table 35a	Roles in Capacity Development

Table	Title
Table 35b	GAMWORKS Competency Framework
Table 35c	Setting Competency Standards
Table 35	Annual Training Cycle
Table 35d	Illustrative Professional Certification Pathways
Table 36	Minimum Retention Periods
Table 37	Records Disposal
Table 38	Conflict of Interest Declaration and Management
Table 39	Gift and Hospitality Thresholds
Table 40	Disciplinary Tiers and Sanctions
Table 41	Counterparty Due Diligence and Sanctions Screening
Table 41a	Beneficial Ownership and PEP Screening
Table 42	Suspicious Transaction Reporting
Table 43	Whistleblower Report Handling
Table 43a	Case Management and Evidence Handling
Table 44	User Access Request and Revocation
Table 45	IT Change Request and Approval
Table 46	Internal Audit Documentation Request Response
Table 47	Consolidated Annual Report Preparation
Table 48	Risk Identification and Assessment
Table 49	Risk Review Frequency
Table 50	Cybersecurity Responsibilities
Table 51	Compliance Review Cycle
Table 52	Boundary with the Technical Manual of Procedures

List of Figures

Figure	Title
Figure 1	GAMWORKS Governance and Organisational Structure
Figure 2	Financial Reporting Approval Chain (Quarterly/Annual)



Figure	Title
Figure 3	Annual Budget Approval



Glossary of Terms

This glossary covers the terms defined throughout this Manual, including the Annexes.

Term	Meaning
Delegated Management Contract (DMC)	An agreement between GAMWORKS and a government Ministry, Department or Agency (MDA) under which GAMWORKS manages the civil works component of that institution's project. Distinct from a development partner-financed project, though the two may coexist within the same undertaking.
Development Partner-Financed Project	A project financed in whole or in part by an external development partner (for example a multilateral or bilateral finance institution) and administered by GAMWORKS.
Own-Source Revenue	Income generated by GAMWORKS from its own operations, distinct from development partner or government financing.
AGETIP Model	The model followed by the AGETIP network of delegated public works agencies in West Africa, to which GAMWORKS belongs, of separating institutional fiduciary policy (this Manual) from technical and project cycle procedures (the Technical Manual of Procedures).
Institutional Procurement	GAMWORKS' own procurement of office supplies, minor equipment and consumables for its administrative operation, governed by this Manual. Distinct from project and DMC related procurement, which is governed by the Technical Manual of Procedures.
Special Account	A bank account opened for a single development partner-financed project or DMC, paying only expenditure eligible under that specific financing agreement (Section 2.3.1).
Government or Beneficiary Counterpart Account	A Gambian Dalasi account holding the Government of The Gambia's or a beneficiary's own contribution to a project or DMC, subject to the same controls as a Special Account (Section 2.3.1).
Ordinary Account	A GAMWORKS bank account holding own-source revenue and institutional funds not subject to project or DMC restrictions (Section 2.3.1).
Withdrawal Application	This Manual's term for a request to a development partner or MDA for the release or replenishment of project or DMC funds, regardless of the term used in the individual agreement (Section 2.3.5).
Delegation of Authority Matrix	The Annex B document setting the specific Gambian Dalasi thresholds for expenditure approval and other delegated authorities referred to throughout this Manual (Sections 1.2.3 and 2.4.2).
Fixed Asset Register	The record of every GAMWORKS asset above a de minimis value, maintained by the Admin Manager and independently verified by physical count (Sections 2.4.4 and 3.1.5).

Term	Meaning
Corrective Action Tracker	The Annex D log of internal and external audit findings, their agreed management response, and their closure status (Sections 1.2.5, 2.1.4 and 2.4.1).
Contracts Committee	The panel GAMWORKS convenes to evaluate and recommend award of a Tier 4 institutional purchase, so that no single individual both evaluates and awards a higher-value purchase (Section 3.1.2).
Selection Panel	The panel convened afresh for each recruitment to shortlist, interview and recommend a candidate; its composition and approval tier depend on the seniority of the position (Section 3.2.4).
Performance Improvement Plan (PIP)	A mandatory, time-bound plan of specific improvement actions triggered by any annual performance rating below the satisfactory threshold, concluding in a documented outcome (Section 3.2.5).
Internal Staff Grievance Mechanism	GAMWORKS' channel for a staff member's grievance about their own employment or a colleague's conduct, entirely separate from the project or community-facing Grievance Redress Mechanism under the Technical Manual of Procedures (Section 4.3.1).
Whistleblower Report	A report of suspected fraud, corruption, AML/CFT violation, SEAH or other integrity breach, which may be made anonymously and is never routed mandatorily through the Director General (Section 4.3.2).
FATF Recommendations	The 40 Recommendations issued by the Financial Action Task Force, the global standard-setting body for anti-money laundering and counter-terrorist financing policy, cited in this Manual as an international benchmark rather than a binding legal requirement on GAMWORKS directly (Section 4.2).
Disciplinary Panel	The panel convened afresh for each Serious or Gross Misconduct disciplinary matter, in the same manner as the Selection Panel and Contracts Committee, rather than a standing body (Section 4.1.5).
Chart of Accounts	GAMWORKS' structured list of accounts and cost centres, aligned to Departments and to individual projects and DMCs, from which all financial and management reporting is drawn (Section 2.1.2).
Cost Centre	A subdivision of the Chart of Accounts representing a Department, project, or DMC, used to track and report income and expenditure separately for that unit (Section 2.1.2).
System of Record	GAMWORKS' accounting software, the single authoritative source for the Chart of Accounts, ledgers and payroll; no parallel spreadsheet or manual ledger substitutes for it (Section 5.1.1).
Legal Hold	A suspension of the normal records retention schedule for any record subject to an ongoing audit, investigation, legal proceeding, or unresolved development partner/DMC query, until the matter concludes (Section 3.4.3).

Term	Meaning
Consolidated Annual Report	The single Board-facing report bringing together GAMWORKS' institutional financial results and every active project's and DMC's results for a financial year (Section 5.2.6).
Politically Exposed Person (PEP)	An individual who holds, or has held, a prominent public function, or a close associate of such a person, carrying a higher inherent risk of corruption or undue influence regardless of whether they appear on a sanctions list (Section 4.2.3).
Corporate Risk Register	GAMWORKS' single consolidated record of institutional risks, their ratings, controls and mitigation actions, maintained at Annex F (Section 5.3.3).
Business Continuity Plan	The plan identifying GAMWORKS' critical functions, the minimum resources needed to continue them through a disruption, and the sequence for restoring full operations (Section 5.4.1).



How to Use this Manual

This Manual is organised into six Parts, numbered Sections (for example 2.1) and Subsections (for example 2.1.1). It is designed as a reference document rather than a text to be read cover to cover: each Section opens with a short introduction and closes with a Key Points box, and coloured callout boxes appear throughout to draw attention to reference standards, control points, and cross-references to the Technical Manual of Procedures.

Wherever a Section describes a multi-step procedure, it is paired with a Process Table (Step, Responsible Role, Action, Timeline, and Output or Deliverable) or a Process Flow diagram, so that staff can follow the procedure directly rather than extracting it from narrative text. Where the Manual requires a specific report or form to be produced, a See Annex box refers to the standard form at Annex C that must be used. These sit alongside, not instead of, the narrative description of why the procedure exists.

The visual conventions used throughout the Manual are consistent across all Parts:

Table 1: Visual Convention Guide

Box Type	What It Means
Reference Standard	The international, regional or national benchmark relevant to this section, cited for comparison only, not as a claim of compliance or accreditation
Internal Control Checkpoint	The specific control point staff must apply at this step
Integrity & AML Alert	A red flag condition tied to ethics, conflict of interest, AML/CFT or whistleblower provisions
Manual Boundary	Where this Manual's scope ends and the Technical Manual of Procedures, or another Section of this Manual, takes over
GAMWORKS Practice Note	A GAMWORKS specific operational example or illustration
Common Pitfall	The most frequent way this goes wrong, and how to avoid it
See Annex	A template or tool in the Annexes that supports this section



PART I: INTRODUCTION AND GOVERNANCE

This Part sets out the purpose, scope and governance foundations of the Manual, including its place within GAMWORKS' two manual fiduciary suite and GAMWORKS' organisational structure.

1.1 Introduction, Purpose and Scope

This section explains why the Manual exists, who and what it applies to, and how it relates to the Technical Manual of Procedures and to GAMWORKS' other governing documents.

MANUAL BOUNDARY *Two Manual Fiduciary Suite*

This Manual and the Technical Manual of Procedures together form GAMWORKS' fiduciary policy suite, consistent with the AGETIP network model.

This Manual covers institutional finance, administration, procurement, human resources, integrity and IT systems.

The Technical Manual of Procedures covers Project Cycle Management for development partner-financed projects and Delegated Management Contracts (DMCs), project and DMC related procurement, institutional grant award and implementation, and the institutional ESMS, Gender Policy, SEAH Prevention Policy, Prohibited Practices framework and GRM integration points.

1.1.1 Purpose of the Manual

This Manual sets out GAMWORKS' policies, procedures and internal controls governing financial management, general administration, human resources, integrity and information systems. It gives GAMWORKS staff, management and the Board a single institutional reference for how these functions are to be conducted, and it gives external parties, including development partners and the Ministries, Departments and Agencies (MDAs) that enter into Delegated Management Contracts (DMCs) with GAMWORKS, a clear statement of GAMWORKS' fiduciary arrangements.

The Manual operates alongside two other governing instruments. The Internal Audit Charter establishes the mandate, independence and reporting lines of the Internal Audit function, and this Manual's control provisions are designed to be consistent with, and auditable against, that Charter. The Risk-Based Audit Plan sets out the areas of highest fiduciary risk that Internal Audit will examine each year, and several of those risk areas, including payroll, treasury and asset management, are the direct subject of Sections 2 to 5 of this Manual. Where the Manual and the Charter or Plan appear to diverge, the Charter and Plan take precedence on matters of audit mandate and scope, and this Manual takes precedence on matters of day to day financial and administrative procedure.

The Manual also operates alongside the Technical Manual of Procedures. The two documents are designed to be read together but not to duplicate one another: Subsection 1.1.3 and Part VI set out the boundary between them in full.



This Manual operates under, and is subordinate to, GAMWORKS' constitutive instrument, its bylaws and applicable Gambian law. It does not purport to override any of these; where a genuine conflict arises, the constitutive instrument, bylaws and applicable law prevail, and the conflict is referred to the Board for resolution and, where the Manual itself requires correction, formal amendment.

1.1.2 Scope of Application

This Manual applies to all GAMWORKS departments, all staff and all Board members in the conduct of their institutional duties. It applies to the financial management of development partner-financed projects or DMCs administered by GAMWORKS, and to GAMWORKS' own-source revenue accounts, on the same basis unless a specific financing agreement or DMC imposes a stricter requirement, in which case the stricter requirement prevails for that project or DMC.

This Manual's core integrity provisions bind, not only staff and Board members, but every consultant, temporary personnel, contractor, supplier, implementing or executing entity, grant recipient and other functionally related party engaged by or through GAMWORKS, through employment terms and contractual clauses. Specifically, Part IV's ethics, conflict-of-interest, prohibited-practices and AML/CFT provisions, and this Manual's records-access, audit-cooperation and reporting obligations, are incorporated as binding contractual terms wherever GAMWORKS engages an external party, not left to apply only by inference.

INTEGRITY & AML ALERT *Anchor Clause for External Parties*

Every contract, grant agreement or engagement letter GAMWORKS issues requires the counterparty to acknowledge these obligations and accept the stated remedies for breach (Section 4.1), including cooperation with audit and investigation and access to relevant records.

Sections 4.1.1 (Code of Ethics), 4.1.2 (Conflict of Interest), 4.2.2 (Counterparty Due Diligence) and 4.3.4 (Protection Against Retaliation) apply this clause rather than separately redefining scope.

INTERNAL CONTROL CHECKPOINT *Scope Trigger*

Where a development partner financing agreement or a DMC sets a requirement that is stricter than this Manual, for example a lower expenditure approval threshold or an additional reporting obligation, that stricter requirement applies for that project or DMC, and Finance is responsible for identifying and documenting the variance before disbursement begins.

This Manual does not apply to matters reserved to the Technical Manual of Procedures, as set out in Subsection 1.1.3.

1.1.3 Structure of the Fiduciary Manual Suite

GAMWORKS maintains two fiduciary manuals, consistent with the model used across the AGETIP network of agencies. This Manual, the Finance and Administration Manual, covers accounting and financial reporting, budgeting, treasury, internal controls, the financial management of development partner-financed projects and DMCs, general administration and asset custody, institutional

procurement, human resources and payroll, capacity development, records management, integrity and anti-money laundering, and IT systems. The Technical Manual of Procedures covers Project Cycle Management for development partner-financed projects and DMCs, project and DMC related procurement, institutional grant award and implementation, and the institutional Environmental and Social Management System, Gender Policy, Sexual Exploitation, Abuse and Harassment (SEAH) Prevention Policy, Prohibited Practices framework and Grievance Redress Mechanism integration points.

MANUAL BOUNDARY *Reading the Two Manuals Together*

A single undertaking, whether a development partner-financed project or a DMC, may touch both manuals: procurement of the works or services follows the Technical Manual of Procedures, while the payment, its recording and its reconciliation follow this Manual.

Part VI sets out this boundary section by section so that staff can identify, for any given task, which Manual governs.

1.1.4 Definitions and Interpretation

In this Manual, “GAMWORKS” or “the Agency” means the Gambian Agency for the Management of Public Works, and “the Board” means the GAMWORKS Board of Directors. Other terms and abbreviations carry the meanings given in the Glossary of Terms and the List of Acronyms at the front of this Manual, unless the context requires otherwise.

A full glossary of technical and financial terms used across the Manual appears in the Glossary of Terms at the front of this Manual.

SECTION 1.1: KEY POINTS

This Manual and the Technical Manual of Procedures together form GAMWORKS' fiduciary suite; this Manual does not duplicate Project Cycle Management, project and DMC related procurement, grant award or ESMS/Gender/GRM content.

It applies to all departments, development partner-financed projects, DMCs and own-source revenue accounts, with stricter external terms prevailing where they exist.

It is designed to be read alongside, and to be auditable against, the Internal Audit Charter and Risk-Based Audit Plan.

1.2 Governance and Institutional Framework

This section presents GAMWORKS' organisational structure in full, covering the General Assembly of Members, the Board of Directors, the Office of the Director General and the two functional Departments, given that this Manual is the natural home for governance, HR and administrative



reporting lines. The Technical Manual of Procedures will reference this same structure rather than repeating it.

1.2.1 Organisational Structure and Reporting Lines

GAMWORKS follows the AGETIP model of governance, structured across four levels. The General Assembly of Members is the apex governance body, convening annually and holding ultimate authority over the Agency's financial accountability, including the approval of audited financial statements. The Board of Directors reports to the General Assembly and provides strategic and fiduciary oversight, including setting policy direction, approving this Manual and the Technical Manual of Procedures, appointing the external auditors, and overseeing institutional risk management. A Board Audit Committee sits within the Board's structure and is the Committee to which Internal Audit reports functionally, as set out in Subsection 1.2.5.

The Director General reports to the Board and provides executive leadership, supported directly by a Corporate Affairs Manager responsible for partnership development, external relations and strategic outreach. The Internal Auditor sits administratively under the Director General but reports functionally and independently to the Board Audit Committee, so that day to day administrative support does not compromise audit independence.

Below the Director General, GAMWORKS operates two functional Departments. The Technical Department is headed by a Technical Director and staffed by Senior Project Managers, Project Managers, Project Engineers and Project Assistants, supported by a Technical Secretary, and is responsible for project and DMC design, construction supervision and quality assurance. The Finance and Administration Department is headed by the Finance and Administration Director and staffed by a Finance Manager supported by a Finance Assistant, an Admin Manager supported by an HR Assistant, a Records Officer, an IT Officer, and administrative and ancillary staff, and is responsible for the functions covered by this Manual.

Figure 1: GAMWORKS Governance and Organisational Structure



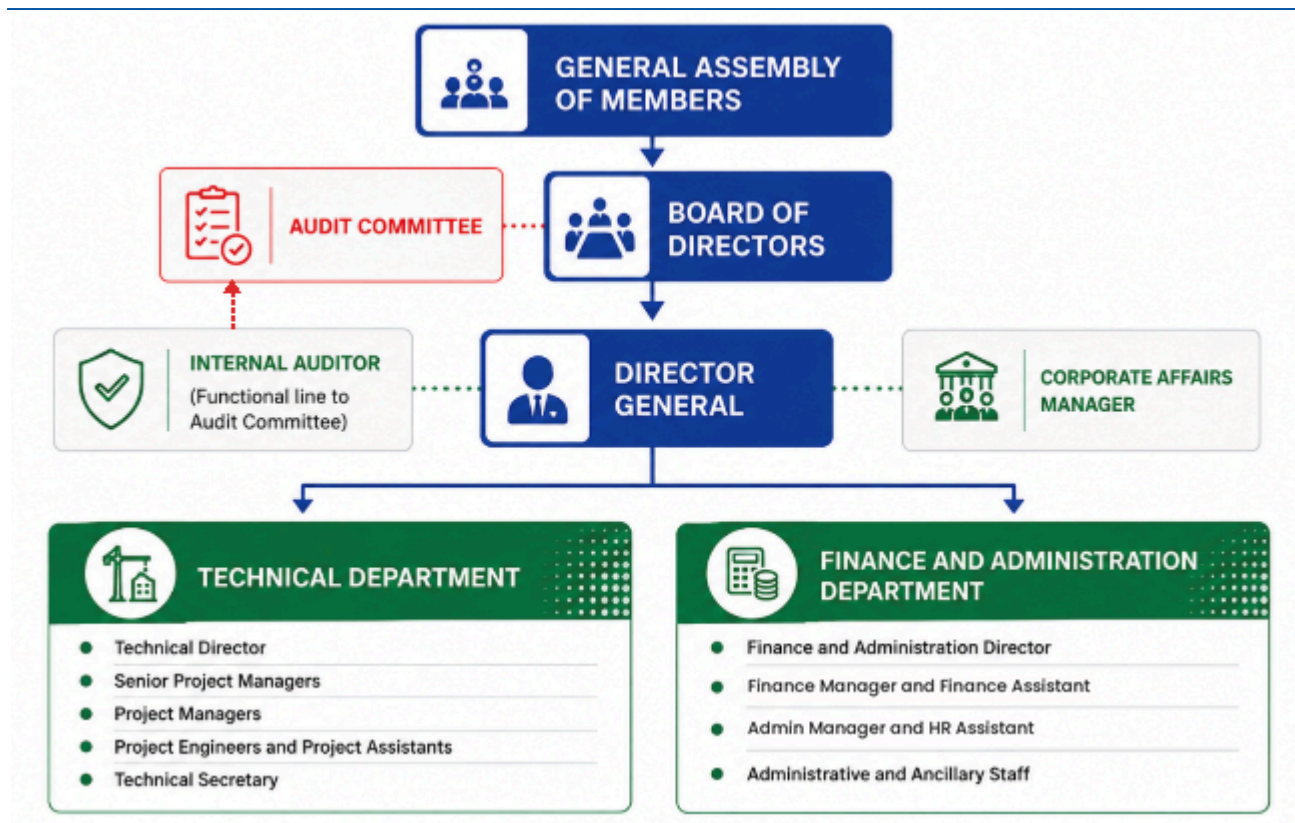


Table 2: GAMWORKS Governance Levels and Reporting Lines

Level	Body or Role	Reports To	Core Responsibility
1	General Assembly of Members	N/A (apex body)	Approves audited financial statements
2	Board of Directors (incl. Audit Committee)	General Assembly	Strategic and fiduciary oversight; approves this Manual and the Technical Manual of Procedures; appoints the external auditors
3	Director General	Board of Directors	Executive leadership; overall strategic coordination
3a	Internal Auditor	Board Audit Committee (functional); Director General (administrative)	Independent audit assurance across the Agency
3b	Corporate Affairs Manager	Director General	Partnership development, external relations, strategic outreach
4	Technical Director	Director General	Project and DMC design, construction supervision, quality assurance

Level	Body or Role	Reports To	Core Responsibility
4	Finance and Administration Director	Director General	Finance, administration, human resources, and the controls set out in this Manual

1.2.2 Roles and Responsibilities

The following role descriptions set out the core responsibilities of the positions referred to in Subsection 1.2.1. They establish accountability for the purposes of this Manual; conditions of service are governed by the GAMWORKS Staff Service Rules (2021), and Section 3.2 of this Manual sets out the related administrative, payroll and control procedures.

Role	Reports To	Core Fiduciary Responsibilities
Finance and Administration Director	Director General	Overall accountability for GAMWORKS' finance, administration and human resources functions and for the integrity of the controls set out in this Manual; certifies quarterly and annual financial reports before submission to the Director General; owns the Delegation of Authority Matrix (Annex B).
Finance Manager	Finance and Administration Director	Day to day accounting, treasury and financial reporting operations; preparation of monthly management accounts and annual financial statements; maintenance of the Chart of Accounts (Annex A).
Admin Manager	Finance and Administration Director	Human resources administration, personnel records, recruitment coordination and payroll input; general administration, asset custody and institutional procurement (Section 3.1).
Technical Director	Director General	Project and DMC design, construction supervision and quality assurance; coordinates with the Finance and Administration Department on asset labelling and on the procurement threshold interface at Section 2.4.3.
Corporate Affairs Manager	Director General	Partnership development, external relations and strategic outreach; supports the Director General on Board and Board Secretariat matters as set out at Subsection 1.2.4.
Internal Auditor	Director General (administrative); Board	Independent audit assurance across the Agency, including assurance testing of management's compliance controls; escalation of findings to the Audit Committee; supports the

Role	Reports To	Core Fiduciary Responsibilities
	Audit Committee (functional)	Audit Committee directly on its Secretariat needs as set out at Subsection 1.2.5. Recuses from auditing any control or process the Internal Auditor has personally designed, implemented or operated, applying Subsection 1.2.6.

1.2.3 Delegation of Authority Matrix

The Delegation of Authority Matrix, at Annex B, sets out the specific financial and administrative approval thresholds delegated to each role referred to in Subsection 1.2.2, and is cross-referenced from the expenditure approval provisions at Section 2.4.

1.2.4 Interface with the Office of the Director General and Departments

The Finance and Administration Department coordinates with the Office of the Director General on institutional budgeting and resource mobilisation reporting, and with the Technical Department on the financial management of development partner-financed projects and DMCs, asset labelling, and procurement thresholds where institutional and project or DMC related procurement intersect. Board Secretariat support is coordinated through the Office of the Director General, as set out at Subsection 1.2.5, and is not a Finance and Administration function.

Table 3: Recurring Coordination Points

Coordination Point	Counterpart	Typical Output
Institutional budgeting	Office of the Director General	Approved annual budget (Section 2.2.2)
Resource mobilisation reporting	Office of the Director General	Quarterly resource mobilisation report
Development partner/DMC financial management	Technical Department	Project/DMC financial reports (Section 2.5)
Asset labelling	Technical Department	Updated Fixed Asset Register (Section 3.1.5)
Procurement threshold interface	Technical Department	Confirmed threshold applicable to a given purchase (Section 2.4.3)

1.2.5 Interface with the Board and Audit Committee

INTEGRITY & AML ALERT *Independence of the Audit Function*

The Internal Auditor reports administratively to the Director General for day to day support, but functionally and independently to the Board Audit Committee on all matters of audit scope, findings and escalation.

This dual reporting line exists so that audit findings and corrective action tracking (Annex D) reach the Audit Committee directly, without Management filtering their substance.

Board Secretariat support sits with the Office of the Director General: the Corporate Affairs Manager provides administrative support to the Board of Directors generally, including scheduling and document preparation, while the Internal Auditor provides direct Secretariat support to the Audit Committee, including the corrective action tracker at Annex D. The Finance and Administration Department contributes financial and administrative reports for Board and Audit Committee consideration but does not hold Secretariat responsibility for either body. Section 5.2 sets out the operational detail of this interface.

This interface operates against the approved Audit Committee Charter/Terms of Reference, which specifies: Committee independence, membership and competence criteria; appointment and removal procedures; authority and access; quorum and meeting frequency; the right to hold private sessions with internal and external auditors; conflict-of-interest rules for Committee members; and minute-taking and reporting requirements.

REFERENCE STANDARD *Audit Committee Oversight and Authority*

The Audit Committee oversees internal audit, external audit, financial reporting and follow-up on outstanding findings across both this Manual and the Technical Manual of Procedures.

The Audit Committee holds authority over the appointment, removal, performance evaluation, resourcing and remuneration of the Head of Internal Audit, exercised independently of the Director General's own line management of that role.

Table 4: Audit Finding Escalation Process

Step	Responsible	Action	Timeline	Output / Deliverable
1	Internal Auditor	Identifies a finding during audit fieldwork and records it in the audit working papers.	During fieldwork	Draft finding, with risk rating
2	Internal Auditor	Issues the finding to the responsible Department for management response, on a fixed timeline.	Within 5 working days of fieldwork completion	Draft management letter point

Step	Responsible	Action	Timeline	Output / Deliverable
3	Responsible Department	Provides a written management response and, where accepted, a target closure date.	Within 10 working days of receipt	Management response
4	Internal Auditor	Finalises the finding with the management response attached, and logs it in the Corrective Action Tracker.	Within 5 working days of receiving the response	Corrective Action Tracker entry (Annex D)
5	Internal Auditor	Reports open and closed findings to the Audit Committee at each scheduled meeting, without Management pre-clearing content.	At each scheduled Committee meeting (at least quarterly)	Audit Committee report
6	Audit Committee	Reviews status, escalates any finding open beyond its target date to the Board.	Immediately on identifying an overdue finding	Board escalation, where required

1.2.6 Institutional Control Model: Three Lines of Defence

Several controls in this Manual require independent challenge of a decision from the function that made it, rather than that function reviewing itself. This Manual adopts one proportionate three-lines-of-defence model, applied consistently across Parts II to V and cross-referenced at the specific points it governs, rather than repeating a bespoke independence arrangement at every affected clause.

Line	Function	Role
First line	Finance Manager, Admin Manager, Technical Director and other operational role-holders named throughout this Manual	Own the transaction or activity, take the operational decision, and hold day to day accountability for the controls in Parts II and III
Second line	Finance and Administration Director	Management-side compliance oversight: conflict-of-interest determinations, the AML/CFT compliance programme, and quarterly first-line compliance testing
Third line	Internal Auditor, reporting functionally to the Board Audit Committee	Independent assurance over the design and operation of both first- and second-line controls; also receives whistleblower reports, conducts investigations, and independently reviews the Finance and

Line	Function	Role
		Administration Director's own risk ratings and compliance testing

Because the second-line role sits with the Finance and Administration Director, the Internal Auditor independently reviews and may challenge the Director's own fiduciary risk ratings and compliance testing, and reports the results to the Audit Committee. Whistleblower reports and investigations sit with the Internal Auditor, outside the Finance and Administration reporting line.

INTEGRITY & AML ALERT *Recusal and Escalation*

The Internal Auditor recuses from auditing any control, process or investigation the Internal Auditor has personally designed, implemented or operated.

Where the Internal Auditor is implicated in, or too close to, a specific case, that case is escalated to the Audit Committee Chair, who may appoint an external investigator where internal independence, expertise or capacity is insufficient (Section 4.3.3).

The Internal Auditor does not investigate its own prior work, and reports findings to the Audit Committee directly, without management filtering their substance.

SECTION 1.2: KEY POINTS

GAMWORKS follows the AGETIP model: General Assembly, Board of Directors (with an Audit Committee), Director General, and two Departments (Technical; Finance and Administration).

The Internal Auditor reports administratively to the Director General but functionally and independently to the Board Audit Committee.

The Corporate Affairs Manager supports the Director General on external relations and partnerships.

The Finance and Administration Director holds the second-line compliance role (conflict of interest, AML/CFT compliance and compliance testing), while the Internal Auditor provides third-line assurance, receives whistleblower reports and reviews the Director's own risk ratings (Subsection 1.2.6).

The Delegation of Authority Matrix (Annex B) operationalises the roles set out here against specific approval thresholds.





GAMWORKS

GAMBIAN AGENCY FOR THE MANAGEMENT
OF PUBLIC WORKS

PART

II

FINANCIAL MANAGEMENT



PART II: FINANCIAL MANAGEMENT

This Part covers GAMWORKS' core financial management functions: accounting and reporting, budgeting, treasury, internal controls, and the financial management of development partner-financed projects and DMCs.

2.1 Accounting Policies and Financial Reporting

This section covers the accounting basis, chart of accounts, financial reporting formats and the external audit interface.

REFERENCE STANDARD *Benchmarks for this Section*

International Financial Reporting Standards (IFRS), for the Agency's own financial statements; and the reporting requirements of each financing agreement or DMC, for project and DMC reporting.

The Gambia Public Finance Act and associated Financial Regulations, as the binding national legal framework.

2.1.1 Basis of Accounting

GAMWORKS applies two accounting bases, one for the Agency's own accounts and one for the projects and DMCs it manages, as it has done since its 2005 Manual.

The Agency's own institutional accounts are kept on the accrual basis, and its annual financial statements are prepared in accordance with International Financial Reporting Standards (IFRS). Income is recognised when earned and expenditure when incurred; property, plant and equipment are depreciated over their useful lives; and receivables, payables and accruals are recorded at each reporting date.

Development partner-financed projects and DMCs are accounted for and reported in the format and on the basis that each financing agreement or DMC requires, which is usually the cash basis (receipts and payments, with interim financial reports and statements of expenditure). Funds received for a project or DMC belong to that project or DMC and are not Agency revenue; only the management or agency fee earned by GAMWORKS is recognised as Agency income.

Table 3a: Accounting Bases

Item	Agency institutional accounts	Projects and DMCs
Basis	Accrual	As the financing agreement or DMC requires, usually cash basis
Standard	International Financial Reporting Standards (IFRS)	The financier's reporting requirements (for example, IPSAS Cash Basis or the financier's own formats)

Item	Agency institutional accounts	Projects and DMCs
Statements	Statement of Financial Position; Statement of Profit or Loss and Other Comprehensive Income; Statement of Changes in Equity; Statement of Cash Flows; Notes (Form C3)	Sources and uses of funds; uses by component; Special Account statement; statement of expenditure (Form C13)
Period	GAMWORKS financial year	As set by the agreement (usually quarterly or semi-annual, and annual)
Audit	Annual external audit of the Agency (Section 2.I.4)	Audit as required by the agreement, by the Agency auditor or the financier's appointed auditor
Prepared by / reviewed by	Finance Manager / Finance and Administration Director	Finance Manager / Finance and Administration Director

INTERNAL CONTROL CHECKPOINT

One Ledger, Two Reports

Project and DMC transactions are recorded in the same accounting system as the Agency's own transactions, under their own cost centres (Section 2.I.2). Project and DMC reports are drawn from those cost centres on the basis the

Item	Agency institutional accounts	Projects and DMCs
agreement requires, and the Finance Manager reconciles them to the general ledger and bank each reporting period. Funds held for projects and DMCs are shown as a liability in the Agency's accounts (funds held on behalf of financiers), not as Agency income.		

2.1.2 Chart of Accounts and Cost Centre Structure

GAMWORKS maintains a Chart of Accounts, at Annex A, structured by natural account classification and by cost centre, with cost centres aligned to Departments and to individual development partner-financed projects or DMCs, so that institutional and project or DMC related costs can be distinguished and reported separately at all times.

GAMWORKS' cost centre structure has historically been built to satisfy development partner reporting formats, in particular the World Bank's Project Management Report (PMR) Cash Model, which requires expenditure to be analysable by source of funds, by disbursement category, by activity and sub-activity, by contract, and by procurement method. This Manual retains that reporting capability but consolidates it: rather than maintaining separate parallel analyses for each development partner's preferred format, the Chart of Accounts is structured so that a single, consistent cost centre hierarchy can answer any development partner's reporting requirement, reducing the risk of the Chart of Accounts becoming, in practice, unreadable through over-segmentation.



INTERNAL CONTROL CHECKPOINT *Cost Centre Discipline*

New cost centres are opened only on the written instruction of the Finance and Administration Director, and only after confirming the reporting requirement they are meant to satisfy, so that the Chart of Accounts does not accumulate cost centres that no development partner or internal report actually uses.

2.1.3 Financial Reporting Formats and Approval Chain

Monthly management accounts, quarterly financial reports to the Board, and annual financial statements each follow standard formats set out in Annex C. Each report is prepared by the Finance Manager, reviewed by the Finance and Administration Director, and, for quarterly and annual reports, submitted to the Director General ahead of Board or Audit Committee presentation.

Figure 2: Financial Reporting Approval Chain (Quarterly/Annual)



SEE ANNEX *Form C1: Monthly Management Accounts*

Complete the form at Annex C: Standard Forms (Form C1), which sets out the required fields, signatures and approvals for this procedure.

SEE ANNEX *Form C2: Quarterly Financial Report*

Complete the form at Annex C: Standard Forms (Form C2), which sets out the required fields, signatures and approvals for this procedure.

2.1.4 External Audit Interface and Management Letter Follow-Up

GAMWORKS' annual financial statements are audited by an external auditor appointed by the Board of Directors. The Finance and Administration Department is responsible for coordinating the audit,

responding to audit queries, and tracking the closure of management letter points through the Corrective Action Tracker at Annex D, in coordination with Internal Audit as set out at Section 5.2.

REFERENCE STANDARD *External Audit Requirements*

The external auditor is demonstrably independent and appointed under transparent, documented criteria (rotation, no conflicting non-audit services, no undue influence from management).

Audits are conducted to International Standards on Auditing (ISA) or an equivalent recognised standard.

The annual audit opinion covers both GAMWORKS' institutional statements and development partner-financed project resources; a separate opinion or an extended scope paragraph is obtained where the institutional audit does not automatically cover the latter.

The audit opinion and financial statements are proactively published, not released only on request, subject only to lawful redaction.

The Audit Committee reviews the audit plan, auditor independence, the audit opinion and the management letter at least annually, and escalates any overdue management letter point to the Board.

Table 5: External Audit Cycle

Step	Responsible	Action	Timeline	Output / Deliverable
1	Board of Directors	Appoints the external auditor for the financial year.	Annually, before the start of the audit	Audit engagement letter
2	Finance and Administration Department	Prepares audit-ready financial statements and supporting schedules.	Within 6 weeks of financial year end (or as set in the external audit engagement letter)	Draft annual financial statements
3	External Auditor	Conducts fieldwork, raises queries, and issues the management letter.	Per the engagement letter, typically 8 to 12 weeks from year end	Audit opinion and management letter
4	Finance and Administration Department	Responds to each management letter point and logs it in the Corrective Action Tracker.	Within 15 working days of receiving the management letter	Corrective Action Tracker entry (Annex D)

Step	Responsible	Action	Timeline	Output / Deliverable
5	Internal Audit	Monitors closure of management letter points alongside its own findings.	Ongoing; reported at least quarterly	Consolidated tracker reported to Audit Committee

SEE ANNEX Form D1: Corrective Action Tracker (Annex D)

Complete the form at Annex D (Form D1), which sets out the required fields, signatures and approvals for this procedure.

SECTION 2.1: KEY POINTS

GAMWORKS keeps its own accounts on the accrual basis under IFRS; projects and DMCs are reported on the basis their agreements require, usually cash basis, from cost centres in the same ledger.

The Chart of Accounts (Annex A) separates institutional and project/DMC related costs by cost centre, consolidated into a single hierarchy that can satisfy any development partner's reporting format.

Reporting follows a fixed review chain: Finance Manager prepares, Finance and Administration Director reviews, Director General receives quarterly and annual reports ahead of Board presentation.

External audit management letter points are tracked to closure through Annex D, coordinated with Internal Audit.

2.2 Budgeting and Management Accounting

This section covers budget preparation through to variance reporting, and the use of management accounts in decision making.

REFERENCE STANDARD *Benchmarks for this Section*

PEFA (Public Expenditure and Financial Accountability) framework, as a benchmark for budget credibility and monitoring practice.

The Gambia Public Finance Act, budgeting provisions, as the binding national legal framework.

2.2.1 Budget Preparation, Monitoring and Variance Reporting

GAMWORKS prepares its annual budget estimates in three linked stages, a structure the Agency has followed since its 2005 Manual and which this Manual retains because it correctly separates two cash flows that behave very differently. The first stage estimates the cash flow generated by ongoing development partner-financed projects and DMCs: monthly programming of expected credits (disbursements and replenishments) and withdrawals (payments), built up from each project's or DMC's approved budget and its outstanding commitments. The second stage estimates the cash flow generated by GAMWORKS' recurring, non-project institutional operations: staff costs, institutional procurement, and other administrative expenditure funded from own-source revenue and any institutional allocation. The third stage consolidates the first two into a single financial and budget estimate, calculating the Agency's total net cash position at the start and end of each period and identifying any short-term financing or investment action needed to keep that position within safe limits.

INTERNAL CONTROL CHECKPOINT *Monitoring Discipline*

Actual expenditure against budget, for both project/DMC and institutional cash flows, is reviewed monthly by the Finance Manager and reported to the Finance and Administration Director, with a variance threshold defined by both value (the greater of 5% or an amount referenced in the Delegation of Authority Matrix, Annex B) and percentage; the Finance Manager is the named responsible analyst, escalation to the Director General occurs within 5 working days of a threshold breach being identified, and a required corrective action is recorded, not only noted.

A budget revision is not the same as a variance: recurring variances against an unrevised budget are a control signal and should trigger a formal budget revision rather than being carried silently period after period.

The annual budget and rolling projections are prepared with explicit reference to, and cross-checked against, the Board-approved GAMWORKS Strategic Plan 2025-2035 and the corporate/annual management plan derived from it: institutional objectives, indicators, baselines, annual and multi-year targets, required resources, dependencies and review frequency. Where a budget line does not trace to a Strategic Plan objective or an approved institutional priority, the Finance and Administration Director records the basis for it before submission.

INTERNAL CONTROL CHECKPOINT *Evidence of Periodic Review*

Evidence of each periodic budget-performance review (the reviewer, the date and any resulting action) is retained in the monthly management accounts file, not only referred to in narrative.

Table 6: Three-Stage Budget Estimate



Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Builds Stage 1: monthly credits and withdrawals for each development partner-financed project and DMC, from approved budgets and outstanding commitments.	Monthly, by the 5th working day of the preceding month	Stage 1 project/DMC cash flow estimate
2	Finance Manager	Builds Stage 2: monthly cash flow for recurring institutional operations (staff costs, institutional procurement, administration).	Same monthly cycle as Stage 1	Stage 2 institutional cash flow estimate
3	Finance Manager	Consolidates Stage 1 and Stage 2 into a single net cash position for the start and end of each period.	Within 3 working days of completing Stages 1 and 2	Stage 3 consolidated financial and budget estimate
4	Finance and Administration Director	Reviews the consolidated estimate and identifies any short-term financing or investment action needed.	Within 5 working days of receiving the consolidated estimate	Reviewed estimate, with financing/investment recommendation

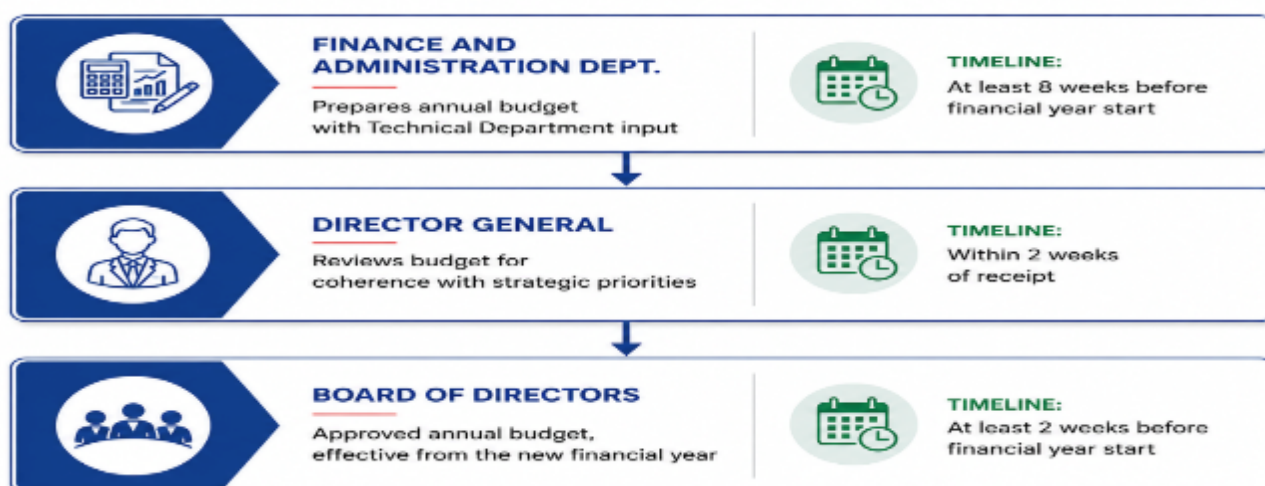
2.2.2 Budget Approval Chain and Revision Procedures

The annual budget is prepared by the Finance and Administration Department in consultation with the Technical Department for project and DMC related estimates, reviewed by the Director General, and approved by the Board before the start of the financial year. Any in-year revision or reallocation within the approved budget is prepared by Finance and approved by the Director General before it takes effect.

Figure 3: Annual Budget Approval



ANNUAL BUDGET APPROVAL PROCESS



SEE ANNEX Form C4: Annual Budget Submission

Complete the form at Annex C: Standard Forms (Form C4), which sets out the required fields, signatures and approvals for this procedure.

2.2.3 Management Accounting Reports and Their Use in Decision-Making

GAMWORKS' accounting software serves as a single source for both financial accounting (the audited statements described at Section 2.1) and management accounting (the internal reports used for day-to-day decision-making), rather than maintaining separate systems for the two purposes. This dual use, a principle carried forward from the 2005 Manual, means that management accounts are only as reliable as the underlying transaction postings: Finance staff should treat every entry as one that will ultimately feed both an external financial statement and an internal management decision.

Table 7: Management Accounting Reports

Report	Frequency	Audience	Decision it Supports
Cost centre variance report	Monthly	Finance and Administration Director	Whether spending authority for a cost centre should be adjusted or paused
Cash position summary	Monthly	Director General	Whether short-term financing or investment action is needed
Consolidated budget vs. actual	Quarterly	Director General	Whether an in-year budget revision or reallocation should be approved

SEE ANNEX Form C5: Cost Centre Variance Report

Complete the form at Annex C: Standard Forms (Form C5), which sets out the required fields, signatures and approvals for this procedure.

SEE ANNEX *Form C6: Cash Position Summary*

Complete the form at Annex C: Standard Forms (Form C6), which sets out the required fields, signatures and approvals for this procedure.

Monthly management accounts compare actual expenditure to budget by cost centre and are used by the Finance and Administration Director and Director General to decide whether spending authority should be adjusted or paused, ahead of the formal quarterly reporting cycle described at Section 2.1.3.

SECTION 2.2: KEY POINTS

Budgeting runs in three linked stages: project/DMC cash flow, recurring institutional cash flow, and a consolidated estimate that identifies any short-term financing or investment need.

The Board approves the annual budget; Finance prepares it and the Director General reviews it before submission. In-year revisions and reallocations are approved by the Director General.

Management accounts and financial accounts are drawn from the same system; a recurring unaddressed variance should trigger a formal budget revision, not be carried silently.

2.3 Treasury and Cash Management

This section covers the Special Accounts structure, bank and cash reconciliation, and the channels through which GAMWORKS makes and receives payments, including digital payment systems.

REFERENCE STANDARD *Benchmarks for this Section*

Central Bank of The Gambia guidelines on treasury operations and payment systems.

Development partner guidelines on Special/Designated Accounts (World Bank, AfDB, BADEA), as benchmarks for account structure and replenishment discipline.

2.3.1 Special Accounts Structure

GAMWORKS operates three types of bank account, a structure the Agency has maintained since its 2005 Manual. A Special Account is opened for each development partner-financed project or DMC, is typically held in a convertible currency where the financing agreement requires it, and pays only expenditure eligible under that specific financing agreement. A Government or Beneficiary Counterpart Account holds the Government of The Gambia's or a beneficiary's own contribution to a project or DMC, is always denominated in Gambian Dalasi, and is subject to the same controls as the

Special Account. An Ordinary Account holds GAMWORKS' own-source revenue and institutional funds not subject to project or DMC restrictions.

MANUAL BOUNDARY *Where Sales Proceeds Are Banked*

Proceeds from the sale of bidding documents under the Technical Manual of Procedures are banked to an Ordinary Account, not a Special or Counterpart Account, and are held in the office cashbox for no more than three working days before banking.

Table 8: Opening a Special or Counterpart Account

Step	Responsible	Action	Timeline	Output / Deliverable
1	Director General	Authorises opening of the account at a commercial bank, ahead of the financing agreement or DMC taking effect.	Before the agreement enters into force	Signed authorisation
2	Finance and Administration Director	Provides the bank with the information required to open the account.	Immediately following authorisation	Account opening instructions to the bank
3	Finance and Administration Director	Receives the bank's confirmation letter and specimen signatory details, and instructs the Finance Manager accordingly.	On receipt from the bank	Confirmation letter and accounting instructions
4	Finance Manager	Sets up the account in the Chart of Accounts and cost centre structure (Section 2.1.2).	Within 5 working days of instruction	Account live in the accounting system
5	Finance Manager	Reconciles the account monthly, reviewed by the Finance and Administration Director.	Monthly	Monthly bank reconciliation (Section 2.3.3)

2.3.2 Treatment of Interest on Project Funds and Own-Source Accounts

Interest earned on a Special or Counterpart Account is treated according to the terms of the relevant financing agreement or DMC: where the agreement is silent, GAMWORKS applies the interest to the project or DMC it was earned on, rather than treating it as institutional income. Interest earned on Ordinary Accounts is GAMWORKS' own-source revenue.

INTERNAL CONTROL CHECKPOINT *Confirming Treatment*

The Finance Manager confirms the interest treatment stated in each financing agreement or DMC before the first interest credit is posted, and records that treatment against the account in the Chart of Accounts, so the correct treatment is not left to individual judgement each time interest is credited.

2.3.3 Bank Reconciliation Procedures

Table 9: Bank Reconciliation and Review

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Prepares the bank reconciliation statement for each account.	Monthly	Draft bank reconciliation
2	Finance and Administration Director	Reviews, re-performs on a selective basis, and signs off the reconciliation.	Within 5 working days of the draft	Approved bank reconciliation
3	Internal Auditor	Reviews controls over Special Accounts and reports findings.	Quarterly	Internal audit control report
4	External Auditor	Verifies reconciliation statements as part of the annual audit.	Annually	Audit confirmation (Section 2.1.4)

INTERNAL CONTROL CHECKPOINT *Reconciling Items and Segregation*

Every reconciling item is aged, investigated and cleared within a defined period; an item outstanding beyond that period is escalated to the Finance and Administration Director, not carried forward silently.

Unsupported write-offs of reconciling items are prohibited; any write-off requires documented justification and the approval level set in the Delegation of Authority Matrix (Annex B).

The preparer and reviewer both date their sign-off on the reconciliation.

The reconciliation preparer holds no incompatible bank payment initiation, cash custody or bank master-data amendment rights, confirmed annually as part of the access review at Section 5.1.

Internal Audit's quarterly review of Special Account controls, applying its own risk-based audit plan (Section 5.2), is independent assurance over the control; it is not a substitute for the Finance and Administration Director's own monthly reconciliation review, which continues regardless of the audit cycle.

2.3.4 Petty Cash Management

GAMWORKS maintains a petty cash imprest for frequent, minor cash expenses. The Finance and Administration Director sets the opening float and the minimum balance that triggers replenishment; use of petty cash for personal advances to staff is prohibited.

Table 10: Petty Cash Replenishment

Step	Responsible	Action	Timeline	Output / Deliverable
1	Petty Cash Custodian (a role distinct from, and not reporting to, whoever posts the ledger)	Disburses cash against supporting documents within authorisation limits, using pre-numbered vouchers issued in sequence, and records each payment in the petty cash register.	Daily, as needed	Signed cash payment voucher
2	Petty Cash Custodian	Balances the till daily and checks it against the petty cash book.	Daily	Daily till balance
3	Finance Manager	Prepares a replenishment request once the float reaches the minimum balance.	As triggered by the minimum balance	Replenishment request
4	Finance and Administration Director	Verifies and signs the replenishment request and cheque.	Within 2 working days of the request	Approved replenishment
5	Internal Auditor	Carries out a spot check of the till and issues a cash control report.	At least monthly	Cash control report

INTEGRITY & AML ALERT *Independent Surprise Counts and Shortage Recovery*

An independent surprise count of the petty cash float is carried out at least monthly, by someone other than the Petty Cash Custodian and other than the Internal Auditor performing the routine quarterly check above (Section 1.2.6), so the surprise count and the audit assurance function remain separate controls.

Imprests are retired within the deadlines at Subsection 2.3.4.1; an imprest not retired by its deadline is escalated as set out there and, if unresolved, treated as a shortage.

A shortage is escalated immediately, investigated, and recovered from the responsible individual where established; recovery and escalation steps are recorded in the Corrective Action Tracker (Annex D).

SEE ANNEX Form C7: Petty Cash Voucher; Form C8: Petty Cash Reconciliation

Complete the forms at Annex C: Standard Forms (Form C7, Form C8), which set out the required fields, signatures and approvals for this procedure.

SEE ANNEX Form C9: Imprest Request and Retirement

Complete the form at Annex C: Standard Forms (Form C9), which sets out the required fields, signatures and approvals for this procedure.

2.3.4.1 Imprests and Travel Advances

An imprest is a cash advance to a named staff member for a specific, approved activity, which the staff member accounts for afterwards. Imprests are recorded as staff advances (Annex A, account 1300) when issued; the expenditure is recognised only when the imprest is retired with supporting documents. Per diem and travel allowances paid under the GAMWORKS Staff Service Rules are lump sums and are not retired, but they are subject to the conditions below.

Table 10a: Types of Imprest and Retirement Deadlines

Type	Who may receive it, and limit	Retirement deadline
Operational imprest (field missions, workshops, site visits, urgent purchases)	Any staff member, for a specific approved activity; amount as approved by the Director General	Within 5 working days after the activity ends
Local travelling imprest	The Director General, under Staff Service Rule 816; D2,500 to D10,000	Within 14 days of return
Overseas travelling imprest	The Director General, under Staff Service Rule 816; US\$1,000 to US\$3,000 depending on duration and location	Within 14 days of return, to the Finance and Administration Director
Per diem and travel allowances (local and overseas)	Staff on official mission, at the rates in Staff Service Rules 810 to 815	Not retired; evidence of travel submitted within 5 working days of return, and any unused allowance refunded

Table 10b: Issue and Retirement of an Imprest

Step	Responsible	Action	Timeline	Output / Deliverable
1	Staff member	Submits Form C9 (Part A) with the purpose, budget line, amount and, for travel, the approved travel authorisation.	Before the activity	Imprest request
2	Finance Manager	Confirms budget availability and that the staff member has no imprest outstanding.	Within 1 working day	Budget confirmation
3	Director General	Approves the imprest, after review by the Finance and Administration Director.	Before payment	Approved imprest
4	Finance Assistant	Pays the imprest, records it in the imprest register and the staff advances account, and notes the retirement deadline. For overseas travel, records the currency and the exchange rate used.	On approval	Payment voucher; register entry
5	Staff member	Retires the imprest on Form C9 (Part B) with original receipts and, for travel, the boarding passes or tickets and a short mission report; refunds any unspent balance in the currency advanced, or its Dalasi equivalent at the issue rate.	Within the deadline at Table 10a	Retirement form; refund receipt
6	Finance Assistant	Checks the receipts against the approved purpose and amount, posts the expenditure to the correct budget line and cost centre, and clears the advance.	Within 3 working days of submission	Cleared advance
7	Finance Manager	Reviews the retirement and approves it; reports the imprest register with ageing to the Finance and Administration Director monthly.	Within 2 working days; monthly report	Approved retirement; ageing report

I
N

Step	Responsible	Action	Timeline	Output / Deliverable
TERMINAL CONTROL CHECKPOINT OVERVIEW				
Only one				



Step	Responsible	Action	Timeline	Output / Deliverable
i m p r e s t m a y b e o u t s t a n d i n g p e r s t a f f m e m b e r, a n d n o n e				



Step	Responsible	Action	Timeline	Output / Deliverable
with im p r e st is is s u e d u n ti l t h e p r e vi o u s o n e is r et ir e d. A n				



Step	Responsible	Action	Timeline	Output / Deliverable
i m p r e st n ot r et ir e d b y it s d e a dl i n e is r e p o rt e d b y t h e Fi				



Step	Responsible	Action	Timeline	Output / Deliverable
n a n c e M a n a g e r to t h e Fi n a n c e a n d A d m i n is tr at io n D ir e				



Step	Responsible	Action	Timeline	Output / Deliverable
ct o r; if it r e m ai n s u n r et ir e d I o w o r ki n g d a y s af te r t h e d e				



Step	Responsible	Action	Timeline	Output / Deliverable
additionally, it is requested to the Director General and the				



Step	Responsible	Action	Timeline	Output / Deliverable
ts ta n di n g a m o u n t is r e c o v e r e d fr o m t h e st af f m e m b e r' s				



Step	Responsible	Action	Timeline	Output / Deliverable
n e xt s al a r y, a s a c k n o w le d g e d i n w ri ti n g o n F o r m C 9 w h				

Step	Responsible	Action	Timeline	Output / Deliverable
e n t h e i m p r e st w a s is s u e d. E x p e n di t u r e w it h o u t a v al				



Step	Responsible	Action	Timeline	Output / Deliverable
identified				



Step	Responsible	Action	Timeline	Output / Deliverable
and certify identified by the staff member and appropriate				



Step	Responsible	Action	Timeline	Output / Deliverable
e Fi n a n c e M a n a g e r. T h e D ir e ct o r G e n e r al 's o w n i m p r e				



Step	Responsible	Action	Timeline	Output / Deliverable
st s a r e r et ir e d to , a n d c e rt if ie d b y, t h e Fi n a n c e a n d A d m				



Step	Responsible	Action	Timeline	Output / Deliverable
i n is tr at io n D ir e ct o r. I N T E R N A L C O N T R O L C H E C K P O I N T				



Step	Responsible	Action	Timeline	Output / Deliverable
T Fo rei gn C ur re nc y on O ve rs ea s Tr av el O v e rs e a s i m p r e st s a r e p ai d				



Step	Responsible	Action	Timeline	Output / Deliverable
and retrieve documents through the system currently where records are possible.				



Step	Responsible	Action	Timeline	Output / Deliverable
Recipients identified at the current review date				



Step	Responsible	Action	Timeline	Output / Deliverable
e o n t h e r e c ei p t o r t h e b a n k r at e o n t h e d at e of t h e e x				



Step	Responsible	Action	Timeline	Output / Deliverable
p e n s e, a n d a n y e x c h a n g e di ff e r e n c e is r e c o r d e d s e				



Step	Responsible	Action	Timeline	Output / Deliverable
p a r at el y. A ll o w a n c e s fo r tr a v el c a n c el le d o r c u t s h o rt a				



Step	Responsible	Action	Timeline	Output / Deliverable
r e r ef u n d e d, a s t h e S ta ff S e r vi c e R ul e s r e q ui r e (R ul e 8				



Step	Responsible	Action	Timeline	Output / Deliverable
I O).				

2.3.5 Withdrawal Application Procedures

Where a financing agreement or DMC requires GAMWORKS to apply for the release or replenishment of funds, this Manual refers to that request as a Withdrawal Application, regardless of the term used in the individual agreement (for example, a replenishment request). This generalises the terminology of the 2005 Manual, which named these requests after each development partner's own usage; the underlying process below is retained. The applicable procedure follows the individual financing agreement; in its absence, GAMWORKS applies the standard process below.

Table 11: Special Account Replenishment

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Prepares the Withdrawal Application from expenditure incurred since the last replenishment.	At least monthly	Draft Withdrawal Application
2	Finance and Administration Director	Verifies the Withdrawal Application and supporting documents.	Within 3 working days	Verified Withdrawal Application
3	Director General	Signs the routing slip and forwards to the authorised signatory.	Within 2 working days	Signed routing slip
4	Authorised Signatory	Approves the Withdrawal Application.	Per the financing agreement's terms	Approved Withdrawal Application
5	Finance and Administration Director	Submits the Withdrawal Application to the development partner and notifies the Finance Manager.	Within 2 working days of approval	Submitted Withdrawal Application
6	Finance Manager	Posts the disbursement on receipt of the development partner's credit advice, and reconciles against the notice.	On receipt	Special Account credited and reconciled

SEE ANNEX Form C10: Withdrawal Application Package Checklist

Complete the form at Annex C: Standard Forms (Form C10), which sets out the required fields, signatures and approvals for this procedure.

Where funds are found to be ineligible, unused, misapplied or unduly paid, the Finance and Administration Director records the amount, recovers it from the responsible party where applicable, and returns it to the development partner as required by the financing agreement. Any suspected prohibited practice identified in the course of this process is escalated immediately to the Internal Auditor (Section 4.3), without waiting for the recovery process to conclude.

2.3.6 Digital Payment Systems and Channels

GAMWORKS makes and receives payments through bank transfer, cheque, and mobile money channels, in addition to cash for petty cash transactions. Controls over the IT systems supporting digital payment channels, including access control and change management, are set out at Section 5.1, which this Subsection cross-references rather than repeats.

2.3.7 Cash Flow Forecasting, Liquidity Management and Investment of Surplus Funds

GAMWORKS maintains a rolling cash flow forecast, covering both development partner/DMC and institutional cash flows, to identify liquidity needs and any surplus available for short-term investment ahead of time, rather than reacting to a cash shortfall or an idle balance after the fact.

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Prepares a rolling 3-month cash flow forecast, building on the Stage 3 consolidated budget estimate (Section 2.2.1) and known upcoming receipts and payments.	Monthly, updated on a rolling basis	Rolling Cash Flow Forecast
2	Finance and Administration Director	Reviews the forecast, identifies any projected liquidity shortfall requiring action, and identifies any surplus available for short-term investment.	Within 5 working days of the forecast	Reviewed Forecast with Liquidity/Investment Recommendation

Step	Responsible	Action	Timeline	Output / Deliverable
3	Finance and Administration Director	Where a surplus is identified on Ordinary Account (own-source) funds only, recommends a short-term investment (e.g. a fixed deposit) consistent with the liquidity needs identified and the investment policy approved by the Director General.	As triggered by an identified surplus	Investment Recommendation
4	Director General	Approves the investment recommendation, within the limits set in the Delegation of Authority Matrix (Annex B).	Within 5 working days of the recommendation	Approved Investment

INTERNAL CONTROL CHECKPOINT *What Cannot Be Invested*

Special Account and Government/Beneficiary Counterpart Account funds are never placed in short-term investment; only genuine institutional (Ordinary Account) surplus, confirmed as not needed to meet a forecast liquidity need, is eligible.

Any investment is placed only with a licensed financial institution and reported to the Audit Committee at its next scheduled meeting.

INTEGRITY & AML ALERT *Digital Payment Alert*

Every digital payment channel used by GAMWORKS must have a named Finance Manager or Finance and Administration Director as the sole initiator and a separate approver before funds move, mirroring the segregation of duties required for cheque payments; a channel that cannot support this separation should not be adopted for institutional use.

SECTION 2.3: KEY POINTS

GAMWORKS operates three account types: Special Accounts (single development partner/DMC), Government or Beneficiary Counterpart Accounts (Gambian Dalasi, GOTG or beneficiary contribution), and Ordinary Accounts (own-source and institutional funds).

Interest on Special/Counterpart Accounts follows the financing agreement or DMC; where silent, it is applied to that project or DMC rather than treated as institutional income.

Bank reconciliation is monthly (Finance Manager, reviewed by the Finance and Administration Director), with quarterly Internal Audit review and annual External Audit verification.

Petty cash and Withdrawal Applications each follow a fixed process with a standard form (Forms C8 and C10 at Annex C).

Digital payment channels are governed by the same segregation of duties as cheque payments, and by the IT controls at Section 5.1.

2.4 Internal Controls and Segregation of Duties

This section covers segregation of duties, expenditure approval thresholds, and the interface between this Manual's approval thresholds and procurement thresholds. GAMWORKS' own procurement of goods and services sits within this Manual; project and DMC related procurement sits within the Technical Manual of Procedures.

REFERENCE STANDARD *Benchmarks for this Section*

COSO Internal Control Integrated Framework, as a benchmark for segregation of duties and control design.

The Gambia Public Procurement Act 2022 and its regulations, as in force from time to time, for the institutional procurement threshold cross-reference at Subsection 2.4.3.

2.4.1 Segregation of Duties: Initiation, Review and Approval

No single role initiates, reviews, approves and has custody of the same transaction. This Manual splits every financial transaction across at least three of the roles set out at Section 1.2.2, so that one person's error or misconduct cannot pass through the Agency's books unchecked.

Table 12: Segregation of Duties by Transaction Type

Transaction Type	Initiates	Reviews / Verifies	Approves
Payment voucher	Finance Manager	Finance and Administration Director	Director General
Bank reconciliation	Finance Manager	Finance and Administration Director	Finance and Administration Director (Section 2.3.3)
Payroll change	Admin Manager	Finance Manager	Finance and Administration Director (Section 3.2.9)
Asset disposal	Admin Manager	Finance and Administration Director	Director General, per the Delegation of Authority Matrix (Annex B)

Asset disposal is initiated by the Admin Manager alone, consistent with the asset custody responsibility assigned at Section 1.2.2, rather than by the Technical Department. For technical or

project-related equipment, the Technical Department provides a technical condition assessment to inform the Admin Manager's initiation, but does not initiate the disposal transaction itself, so that custody and initiation are not split across two roles for the same asset.

INTERNAL CONTROL CHECKPOINT *No Combined Roles*

A role that has physical custody of cash, cheques or assets does not also record the related transaction in the accounting system, and does not approve its own initiation. Where GAMWORKS' small staff numbers make full separation difficult for a specific transaction, the Finance and Administration Director documents a compensating control (for example, a second-person review) rather than allowing the combination to pass unaddressed.

2.4.1.1 End-to-End Role Map for Institutional Procurement-to-Pay

The table below maps every role touching a single procurement-to-pay transaction, from requisition through to master-data maintenance, so segregation can be verified end to end rather than transaction type by transaction type.

Stage	Role
Requisition	Requesting staff member / Department
Commitment (budget check)	Finance Manager
Procurement (institutional)	Admin Manager, per Section 3.1
Receipt / goods or service verification	An independent requesting or technical representative, not the Admin Manager who placed the order (Section 3.1.2)
Invoice verification	Finance Manager
Posting to the ledger	Finance Assistant, reviewed by the Finance Manager
Payment initiation	Finance Assistant prepares the payment voucher; Finance Manager checks it
Payment approval	Director General (Table 13); petty cash within the limit by the Finance Manager
Bank release	Authorised bank signatory, per the bank mandate
Custody (cash/cheques/assets)	Petty Cash Custodian (cash, Section 2.3.4) or Admin Manager (assets, Section 3.1)
Reconciliation	Finance Manager, reviewed by the Finance and Administration Director (Section 2.3.3)

Stage	Role
Vendor/customer master-data maintenance	Finance Manager creates or amends; Finance and Administration Director independently confirms any change to existing bank or contact details before the next payment to that vendor is released

2.4.2 Expenditure Approval

The Director General approves all expenditure. Every payment voucher is prepared by the Finance Assistant, checked by the Finance Manager and reviewed by the Finance and Administration Director before it is presented to the Director General for approval. The only exception is a petty cash payment within the single-payment limit in Annex B, which the Finance Manager authorises (Section 2.3.4). In the Director General's absence, approval is exercised by the officer designated in writing under an acting arrangement, for the period of that arrangement only.

Table 13: Expenditure Approval

Tier	Approving Role	Threshold (GMD)	Notes
1	Finance Manager	Petty cash payments within the single-payment limit (Annex B)	Routine petty cash only (Section 2.3.4)
2	Director General	All other expenditure, whatever the amount	Reviewed first by the Finance and Administration Director; includes any expenditure outside the approved budget, with written justification

SEE ANNEX *Form C12: Payment Voucher*

Complete the form at Annex C: Standard Forms (Form C12), which sets out the required fields, signatures and approvals for this procedure.

2.4.2.1 Mandatory Checks and Prohibited Practices

INTERNAL CONTROL CHECKPOINT *Four Separate Mandatory Checks*

Every expenditure approval confirms, as four separate checks, not one combined judgement: budget availability; procurement compliance; evidence of receipt of the goods, works or services; and that the approver holds delegated financial approval authority for the amount and category.

A contract variation is approved by the Director General on the basis of the cumulative revised contract value, not the original value. Emergency expenditure follows the exceptional-procurement

grounds and post-hoc ratification process at the Technical Manual of Procedures' procurement provisions, applied here for institutional purchases; it is not a route around the approval requirements above. Where a claim involves foreign currency, the exchange rate applied is the rate on the date of the underlying transaction, not the date of approval or payment. An officer acting in a higher role during an absence holds that role's approval authority only for the duration of the acting arrangement, which is documented in writing.

INTEGRITY & AML ALERT *Prohibited Practices*

No individual approves their own expenditure, reimburses their own advance, or approves a payment to themselves or a related party; the Director General's own claims and imprests are certified by the Finance and Administration Director and reported to the Audit Committee.

Splitting a single procurement or payment into smaller transactions to stay within, or avoid, a procurement bracket or competition requirement is prohibited without exception.

2.4.3 Interface with Agency Procurement Thresholds

MANUAL BOUNDARY *Which Threshold Applies*

This Manual's expenditure approval thresholds (Table 13) govern financial sign-off for any payment, regardless of funding source.

A separate procurement threshold governs how a purchase is sourced: institutional procurement of office supplies, minor equipment and consumables follows this Manual's Section 3.1 and, where applicable, the Gambia Public Procurement Act; project and DMC related procurement follows the Technical Manual of Procedures.

The determining factor is the funding source of the purchase, not the amount or the requesting Department: a Technical Department request funded from a development partner project follows the Technical Manual of Procedures even if it is small, and a Finance Department request funded institutionally follows Section 3.1 even if it is large.

Table 14: Procurement Threshold Decision Guide

Funding Source	Procurement Governed By	Financial Sign-Off Governed By
Institutional / own-source	This Manual, Section 3.1	This Manual, Table 13
Development partner-financed project	Technical Manual of Procedures	This Manual, Table 13
Delegated Management Contract (DMC)	Technical Manual of Procedures	This Manual, Table 13

2.4.4 Fixed Asset Register Verification Controls

The Fixed Asset Register itself, and the day to day custodial responsibilities over GAMWORKS' physical assets, are set out at Section 3.1.5. This Subsection sets out the control that verifies the Register remains accurate: an independent physical count reconciled back to it.

Table 15: Annual Fixed Asset Verification

Step	Responsible	Action	Timeline	Output / Deliverable
1	Admin Manager	Maintains the Fixed Asset Register as assets are acquired, transferred or disposed of.	Ongoing	Up to date Fixed Asset Register
2	Finance Manager	Conducts an independent physical count of assets against the Register.	Annually, ahead of the annual financial statements	Physical count schedule
3	Finance Manager	Reconciles the physical count to the Register and reports discrepancies.	Within 10 working days of the count	Asset verification report
4	Finance and Administration Director	Reviews discrepancies and directs correction of the Register or investigation of missing assets.	Within 5 working days of the report	Approved Register corrections or investigation referral

INTERNAL CONTROL CHECKPOINT *Independence of the Count*

The person who conducts the physical asset count is never the person who maintains the Fixed Asset Register, so that the count is a genuine check on the Register rather than a restatement of it.

SECTION 2.4: KEY POINTS

Every financial transaction is split across at least three roles: initiation, review, and approval, with custody held separately from recording.

The Director General approves all expenditure after review by the Finance and Administration Director; the Finance Manager authorises only petty cash within the limit in Annex B.

Procurement threshold and financial sign-off are separate questions: which Manual governs procurement depends on funding source, while this Manual's approval thresholds govern financial sign-off regardless of funding source.

The Fixed Asset Register (Section 3.1.5) is verified annually by physical count, performed by someone other than the person who maintains it.

2.5 Development Partner-Financed Project and DMC Financial Management

This section covers development partner and DMC reporting obligations, the interface between Special Accounts and project cost centres, reconciliation of project accounts, and closure procedures once a project or DMC is complete.

Every requirement in this section, financial management, accounting, reporting, audit interface and closure, applies equally and identically to development partner-financed projects and to Delegated Management Contracts; the term “project or DMC” used throughout is not a lesser standard for DMCs, and no step below is skipped or simplified because a given undertaking is a DMC rather than a donor-financed project.

REFERENCE STANDARD *Benchmarks for this Section*

World Bank, AfDB and BADEA project financial management and reporting guidelines, as benchmarks for reporting content and closure practice.

Development partner fiduciary and reporting requirements, where a specific financing agreement makes them applicable.

2.5.1 Development Partner and DMC Reporting Obligations

Each financing agreement or DMC sets its own reporting calendar and format. The Finance and Administration Department maintains a single consolidated reporting calendar covering every active project and DMC, so that no obligation is tracked only in one individual's memory.

Table 16: Development Partner/DMC Financial Report Submission

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Prepares the financial report against the individual agreement's required format.	Per the agreement's reporting calendar	Draft project/DMC financial report
2	Finance and Administration Director	Reviews the report against the underlying cost centre records.	Within 5 working days of the draft	Reviewed report

Step	Responsible	Action	Timeline	Output / Deliverable
3	Director General	Signs where the agreement requires Director General certification.	Within 3 working days of review	Certified report, where required
4	Finance and Administration Department	Submits the report to the development partner or MDA counterpart.	By the agreement's due date	Submitted report; entry updated in the consolidated reporting calendar

SEE ANNEX *Form C13: Development Partner and DMC Interim Financial Report*

Complete the form at Annex C: Standard Forms (Form C13), which sets out the required fields, signatures and approvals for this procedure.

Each standard form is version-controlled: the version and date of the form used is recorded on the report itself, so a report can always be matched to the format in force at the time. The Finance and Administration Director's review under Step 2 is evidenced in writing, not assumed from sign-off alone. Where a development partner or MDA identifies an error after submission, the correction is made and the report resubmitted within 5 working days, and the correction is noted in the consolidated reporting calendar. Source records supporting every report are retained per the schedule at Section 3.4.

2.5.2 Interface Between Special Accounts and Project Cost Centres

Each Special or Counterpart Account (Section 2.3.1) maps to one or more project or DMC cost centres in the Chart of Accounts (Section 2.1.2). The Finance Manager reconciles each account's cash balance to the sum of its linked cost centres' unspent budget monthly, alongside the bank reconciliation at Section 2.3.3.

INTERNAL CONTROL CHECKPOINT *No Overdraw*

No expenditure is posted to a project or DMC cost centre without a corresponding available balance in its linked Special or Counterpart Account. Where a genuine timing gap exists between incurring eligible expenditure and receiving replenishment, the Finance and Administration Director authorises the specific transaction in writing rather than allowing the system to post it by default.

2.5.3 Reconciliation of Development Partner/DMC Project Accounts

GAMWORKS reconciles its own project and DMC accounting records against the development partner's or MDA's own statement of the account, a discipline the Agency has maintained since its

2005 Manual. Where a development partner issues a periodic transaction notice or statement, the Finance Manager reconciles GAMWORKS' records to it as soon as it is received, rather than waiting for the next scheduled reconciliation cycle.

Table 17: Quarterly Project Account Reconciliation

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Reconciles GAMWORKS' project/DMC records against the development partner's or MDA's statement.	Quarterly, and on receipt of any interim statement	Draft reconciliation
2	Finance and Administration Director	Reviews the reconciliation and any discrepancies identified.	Within 5 working days	Reviewed reconciliation
3	Finance and Administration Director	Escalates any discrepancy beyond the threshold set at Section 2.2.1 to the Director General.	Immediately on identifying an escalation-worthy discrepancy	Director General notified, where applicable

2.5.4 Closure Procedures for Completed Projects

On completion of a development partner-financed project or DMC, GAMWORKS closes out its financial records before closing the associated Special or Counterpart Account. The treatment of any unspent balance follows the individual financing agreement or DMC; where the agreement is silent, the Finance and Administration Director confirms the required treatment with the development partner or MDA in writing before disbursing or returning any residual funds.

Table 18: Project/DMC Closure

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Prepares the final expenditure reconciliation and a draft closure statement.	Within 30 days of project or DMC completion	Draft closure statement
2	Finance and Administration Director	Reviews the closure statement and confirms treatment of any unspent balance.	Within 10 working days	Reviewed closure statement
3	Director General	Certifies the final closure statement for submission.	Within 5 working days	Certified closure statement

Step	Responsible	Action	Timeline	Output / Deliverable
4	Finance and Administration Department	Submits the closure statement, settles any unspent balance per the agreement, and closes the Special or Counterpart Account with the bank.	Within 15 working days of certification	Submitted closure statement; account closed
5	Admin Manager	Archives project or DMC records per the retention schedule.	Following account closure	Archived records (Section 3.4)

SEE ANNEX *Form CI4: Project and DMC Closure Statement*

Complete the form at Annex C: Standard Forms (Form CI4), which sets out the required fields, signatures and approvals for this procedure.

A GAMWORKS Consolidated Annual Report, bringing institutional and every project/DMC result together for the Board in a single document, is addressed at Section 5.2 (Administrative and Financial Interface with Internal Audit and the Board), rather than here, since it is fundamentally a Board oversight product rather than a project financial management output.

SECTION 2.5: KEY POINTS

The Finance and Administration Department maintains one consolidated reporting calendar across all active development partner-financed projects and DMCs, rather than tracking each agreement's obligations separately.

Special/Counterpart Accounts and project or DMC cost centres are reconciled to each other monthly; no cost centre is overdrawn against its linked account without written authorisation.

GAMWORKS' own project/DMC records are reconciled against the development partner's or MDA's own statement quarterly, and on receipt of any interim statement.

Closure follows a fixed sequence: final reconciliation, confirmed treatment of any unspent balance, certification, submission and account closure, then archiving.

2.6 Revenue Management

This section covers GAMWORKS' own-source revenue: institutional income distinct from development partner or DMC financing, from invoicing through to collection and recognition in the financial statements.

2.6.1 Revenue Sources

GAMWORKS' own-source revenue arises principally from the sale of bidding documents (Section 3.1.1's boundary note), institutional service fees where GAMWORKS charges for a service on a cost-recovery basis, and any rental or other income from institutional assets. Each revenue source is mapped to its own cost centre in the Chart of Accounts (Section 2.1.2), so revenue performance can be tracked source by source, not only as a single aggregate figure.

2.6.2 Invoicing and Receivables Management

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Raises an invoice against the agreed price or fee schedule, with a unique invoice number.	Within 3 working days of the revenue event	Invoice
2	Finance Manager	Records the invoice as a receivable and monitors it against its payment terms.	Ongoing	Receivables Ledger entry
3	Finance and Administration Director	Reviews the receivables ageing report and directs collection action on any invoice overdue beyond the payment terms.	Monthly	Reviewed Ageing Report

2.6.3 Collections

INTERNAL CONTROL CHECKPOINT *Escalating Overdue Receivables*

An invoice overdue by more than 30 days triggers a formal collection notice; an invoice overdue by more than 90 days is escalated to the Director General with a recommendation (continued pursuit, negotiated settlement, or write-off), applying the same write-off approval standard as Section 2.4.

No receivable is written off without the Finance and Administration Director's documented justification and approval at the level set in the Delegation of Authority Matrix (Annex B).

2.6.4 Revenue Recognition

Revenue is recognised in the period the underlying service is delivered or the sale completed, not when cash is received, consistent with the accrual basis and IFRS adopted at Section 2.1.1. Funds

received for projects and DMCs are not Agency revenue; only the management or agency fee earned is recognised as income.

SECTION 2.6: KEY POINTS

Own-source revenue is managed source by source, through invoicing, receivables monitoring and collection, and recognised on the same accrual basis as the rest of GAMWORKS' accounts.

Overdue receivables escalate on a fixed timeline; no write-off happens without documented justification and approval at the correct Delegation of Authority level.



GAMBIAN AGENCY FOR THE MANAGEMENT
OF PUBLIC WORKS

PART

III

**GENERAL ADMINISTRATION,
HUMAN RESOURCES &
CAPACITY DEVELOPMENT**



PART III: GENERAL ADMINISTRATION, HUMAN RESOURCES AND CAPACITY DEVELOPMENT

This Part covers general administration and asset custody, human resources and payroll, capacity development and training, and records management.

3.1 General Administration, Asset Custody, Fleet and Office Operations

This section covers custodial responsibility for GAMWORKS' physical assets, vehicles and premises, and the Administration facing procurement of office supplies and consumables, distinct from project and DMC related procurement under the Technical Manual of Procedures.

REFERENCE STANDARD *Benchmarks for this Section*

The Gambia Public Procurement Act 2022 and its regulations, as in force from time to time, for institutional procurement and asset disposal provisions.

Public sector asset management guidance, as a benchmark for custodial and verification practice.

3.1.1 Custodial Responsibility for Physical Assets, Vehicles and Premises

The Admin Manager holds registry and custodial responsibility for GAMWORKS' physical assets, consistent with the asset disposal role confirmed at Section 2.4.1. Day to day use of an asset is separately assigned to a named custodian, the staff member who uses it, so that the Admin Manager's registry role and the individual user's responsibility for day to day care are not held by the same person for the same asset.

Table 19: Asset Assignment on Acquisition

Step	Responsible	Action	Timeline	Output / Deliverable
1	Admin Manager	Records the new asset in the Fixed Asset Register with a unique asset identifier.	Within 3 working days of receipt	Register entry (Section 3.1.5)
2	Admin Manager	Assigns the asset to a named custodian and issues the asset with an acknowledgment form.	At the point of issue	Signed Asset Assignment Form
3	Named Custodian	Confirms receipt and condition, and reports any loss or damage promptly.	On receipt; ongoing	Custodian's signed acknowledgment

SEE ANNEX *Form C16: Asset Assignment and Acknowledgment*

Complete the form at Annex C: Standard Forms (Form C16), which sets out the required fields, signatures and approvals for this procedure.

3.1.2 Procurement of Office Supplies, Minor Equipment and Consumables

GAMWORKS' own procurement of office supplies, minor equipment and consumables for its institutional operation follows this Subsection. Project and DMC related procurement, regardless of value, follows the Technical Manual of Procedures, per the funding-source test at Section 2.4.3.

REFERENCE STANDARD *Boundary with the Technical Manual of Procedures*

This Subsection is deliberately limited to institutional procurement of office supplies, minor equipment and consumables. The fuller procurement policy covering works, goods, services and consultants, including planning, market analysis, method selection, published criteria, evaluation, award, standstill and complaints, contract management, variations, emergency/single-source controls, conflicts, debarment and sanctions checks, anti-collusion, disclosure and records, sits in the Technical Manual of Procedures and governs project and DMC related procurement regardless of value, per Section 2.4.3.

The institutional thresholds in this Subsection are set by GAMWORKS, with the Gambia Public Procurement Act 2022 and its Regulations used as a reference.

Institutional procurement decisions also give reasonable weight to sustainability where cost and quality are comparable: energy efficiency, durability and environmental impact of the goods or equipment purchased, and, where practicable, opportunities to support local and women-owned suppliers, applying this consideration at Table 20's evaluation stage rather than as a separate process.

Table 20: Institutional Procurement Method Thresholds

Tier	Value (GMD)	Procurement Method	Assessment / Award
1	Annex B, Bracket 1	Local shopping against a single verbal or written quotation	Admin Manager confirms reasonableness of the quotation
2	Annex B, Bracket 2	At least three suppliers consulted; verbal quotations recorded	Admin Manager compares quotations; Director General approves the selection
3	Annex B, Bracket 3	At least three formal written quotations	Admin Manager compares quotations; Finance Manager confirms budget
4	Annex B, Bracket 4	Open tender, with the Gambia Public Procurement Act 2022 used as a reference	Contracts Committee evaluates and recommends award (Table 21)

INTERNAL CONTROL CHECKPOINT *Contracts Committee for Tier 4 Purchases*

A Tier 4 purchase is not evaluated or awarded by one individual. GAMWORKS convenes a Contracts Committee, comprising at minimum the Finance and Administration Director, the Admin Manager, and a Technical Department nominee where the purchase has a technical specification, to evaluate competitive quotations or tenders and recommend an award before the approving officer signs off per Table 13.

Table 21: Institutional Purchase Process

Step	Responsible	Action	Timeline	Output / Deliverable
1	Requesting Department	Identifies the need and submits a purchase requisition.	As needed	Purchase requisition
2	Admin Manager	Sources quotations, or convenes the Contracts Committee for a Tier 4 purchase, per Table 20.	Within 10 working days of the requisition	Quotations or Contracts Committee recommendation
3	Finance Manager	Confirms budget availability against the relevant cost centre.	Within 2 working days	Budget confirmation
4	Director General	Approves the purchase, after review by the Finance and Administration Director (Table 13).	Within 2 working days of budget confirmation	Approved purchase order
5	Admin Manager; an independent requesting or technical representative	Admin Manager places the order; receipt and verification of the goods against the order is performed or witnessed by an independent requesting or technical representative who did not place the order.	On delivery	Goods received note
6	Finance Manager	Processes payment per the controls at Section 2.4.1.	Per the agreed payment terms	Payment voucher (Section 2.4.2)

INTEGRITY & AML ALERT *Contracts Committee and Award Integrity*

Step	Responsible	Action	Timeline	Output / Deliverable
Every Contracts Committee member signs a conflict-of-interest declaration before evaluating quotations or tenders for that specific purchase. Evaluation is scored against criteria disclosed in the request for quotations or tender, not applied after the fact. The recommended awardee is screened for sanctions and, for Tier 4 purchases, basic due diligence (legal status, ownership) before the award is finalised, applying Section 4.2.2. For a direct award or single-source purchase, the Finance and Administration Director's written justification (above) includes evidence of price/cost reasonableness, not only the grounds for exception.				

Contract-performance records, any complaint and its outcome, and the eventual award publication (Section 3.4.4) are retained in the procurement file (Table 21a). The Finance and Administration Director's quarterly quality review of procurement files (above) is a management control; it is distinct from, and does not substitute for, Internal Audit's own independent testing of institutional procurement under its risk-based plan (Section 5.2).

SEE ANNEX *Form C17: Purchase Requisition; Form C18: Local Purchase Order; Form C19: Goods and Services Received*
Note

Complete the forms at Annex C: Standard Forms (Form C17, Form C18, Form C19), which set out the required fields, signatures and approvals for this procedure.

Every institutional purchase under this Subsection is supported by a complete procurement file, retained per Section 3.4.1, so that any purchase can be reconstructed from its records alone without relying on staff memory of how the decision was made.

Table 21a: Minimum Procurement File Contents

Document	Required For
Purchase requisition, stating the need and estimated value	Every purchase
Quotations obtained, per the tier at Table 20	Tier 2, Tier 3 and Tier 4 purchases
Contracts Committee recommendation (above)	Tier 4 purchases
Written justification, approved by the Finance and Administration Director	Any direct award or single-source purchase outside the normal tiered process

Document	Required For
Purchase order, goods received note, and payment voucher	Every purchase

INTERNAL CONTROL CHECKPOINT *Direct Award Is the Exception, Not a Shortcut*

A direct award or single-source purchase, made without the quotations or competitive process Table 20 would otherwise require, is permitted only for a genuine emergency, a sole supplier of a specific item, or a documented continuation of an existing contract, and requires the Finance and Administration Director's written justification before the purchase proceeds, not after. A direct award used to avoid the time or paperwork of the normal process is a control breach, not a legitimate exception.

The Finance and Administration Director reviews a sample of procurement files each quarter for completeness against Table 21a, independently of any specific purchase under query, so that gaps are found through routine quality assurance rather than only when an external audit raises them.

3.1.3 Vehicle Allocation, Logging and Fuel Management

Every GAMWORKS vehicle is logged for each trip, and fuel is issued against that log rather than on request alone. Personal use of GAMWORKS vehicles outside authorised official duty is prohibited.

Table 22: Vehicle Trip Authorisation and Fuel Management

Step	Responsible	Action	Timeline	Output / Deliverable
1	Requesting Staff Member	Requests vehicle allocation for official duty, stating purpose and destination.	Ahead of the trip	Vehicle request
2	Admin Manager	Allocates the vehicle and driver, and issues the vehicle log sheet.	On approval of the request	Vehicle log sheet issued
3	Driver	Records mileage, destination and fuel issued for each trip in the log sheet.	For each trip	Completed log sheet
4	Admin Manager	Reconciles fuel issued against mileage logged monthly.	Monthly	Fuel reconciliation report

SEE ANNEX Form C20: Vehicle Log Sheet

Complete the form at Annex C: Standard Forms (Form C20), which sets out the required fields, signatures and approvals for this procedure.

3.1.4 Physical Access and Security of Premises, Records and Assets

Access to GAMWORKS premises and to areas holding cash, records or high-value assets is restricted and logged, with the level of restriction matched to what is held in each area.

Table 23: Physical Security Measures by Area

Area	Security Measure	Responsible Role
Petty cash till and cheques	Locked safe; key holders limited to the Finance Manager and Finance and Administration Director	Finance and Administration Director
Server and IT equipment room	Restricted access; access log maintained	Admin Manager
Records archive	Locked storage; sign-out register for file removal	Admin Manager
General office premises	Visitor log at reception; after-hours access requires authorisation	Admin Manager

3.1.5 Fixed Asset Register and Periodic Verification

The Fixed Asset Register records every GAMWORKS asset above a de minimis value set by the Finance and Administration Director. Its periodic physical verification, and the segregation between the person who maintains it and the person who counts against it, are set out at Section 2.4.4 and are not repeated here.

SEE ANNEX Form C21: Fixed Asset Register

Complete the form at Annex C: Standard Forms (Form C21), which sets out the required fields, signatures and approvals for this procedure.

3.1.6 Coordination with Finance on Asset Labelling

Every asset is physically labelled with the same unique identifier used in the Fixed Asset Register, so that a label on an asset and a line in the Register can always be matched to each other without ambiguity.

Table 24: Asset Labelling on Acquisition



Step	Responsible	Action	Timeline	Output / Deliverable
1	Admin Manager	Assigns the asset's unique identifier at the point of Register entry (Section 3.1.1).	Within 3 working days of receipt	Asset identifier assigned
2	Admin Manager	Physically labels the asset with the identifier.	Before the asset is issued to a custodian	Labelled asset
3	Finance Manager	Confirms the identifier matches the cost centre coding in the Chart of Accounts (Section 2.1.2).	Within 5 working days of labelling	Confirmed cost centre match

3.1.7 Asset Maintenance and Transfer

Acquisition, registration and custody are addressed above; maintenance and transfer complete the asset lifecycle through to disposal (Section 2.4.1).

Step	Responsible	Action	Output / Deliverable
1	Named Custodian	Reports maintenance needs or a fault to the Admin Manager promptly, rather than continuing to use a defective asset.	Maintenance Request
2	Admin Manager	Arranges maintenance or repair, within the budget confirmed by the Finance Manager, and logs the maintenance history against the asset's Fixed Asset Register entry.	Updated Maintenance History
3	Admin Manager	On a transfer of an asset between custodians, Departments, or project/DMC cost centres, updates the Fixed Asset Register entry and obtains a new signed Asset Assignment Form from the receiving custodian.	Updated Register Entry; New Assignment Form

INTERNAL CONTROL CHECKPOINT *No Transfer Without a Paper Trail*

An asset is not physically moved between custodians, Departments or cost centres without the Register being updated to match; the periodic verification at Section 2.4.4 tests for this specifically.

3.1.8 Asset Disposal

Assets that are obsolete, beyond economic repair, surplus to requirements or lost are disposed of transparently and for the best value reasonably obtainable. Assets financed by a development partner or under a DMC are disposed of only as the financing agreement or DMC allows, and the proceeds are applied as it requires.

Step	Responsible	Action	Timeline	Output / Deliverable
1	Admin Manager	Identifies assets for disposal from the annual verification or a custodian's report, and prepares a disposal list with the asset identifiers and condition.	At the annual verification, or as needed	Disposal list
2	Independent professional valuer	Values each vehicle, building, item of plant or other asset at or above the Fixed Asset Register threshold in Annex B, and provides a written valuation report. The valuer has no interest in the assets or the likely buyers.	Within the period set in the engagement	Valuation report
3	Finance and Administration Director	Reviews the list and valuation, and recommends the method of disposal (public auction, sealed bids, trade-in, transfer to a public body, or scrapping for items of no value) and the reserve price.	Within 10 working days of the valuation	Disposal recommendation
4	Director General	Approves the disposal, its method and the reserve price.	Within 5 working days	Approved disposal
5	Admin Manager	Carries out the disposal by the approved method; no staff member involved in the disposal may buy the asset.	As approved	Sale or scrap record
6	Finance Manager	Banks the proceeds, removes the asset from the ledger, records any gain or loss, and updates the Fixed Asset Register with the date, method and proceeds.	Within 5 working days of the sale	Updated ledger and Register

Step	Responsible	Action	Timeline	Output / Deliverable
INTERNAL CONTROL CHECKPOINT Valuation Before Disposal				



Step	Responsible	Action	Timeline	Output / Deliverable
1 Nov e h ic le , b ui ld i n g o r ot h e r a ss et at o r a b o v e t h e Fi				



Step	Responsible	Action	Timeline	Output / Deliverable
x e d A ss et R e gi st e r t h r e s h ol d is s ol d, tr a d e d i n o r w ri tt e n				



Step	Responsible	Action	Timeline	Output / Deliverable
of f w it h o u t a c u rr e n t w ri tt e n v al u at io n b y a n i n d e p e n d				



Step	Responsible	Action	Timeline	Output / Deliverable
e n t p r of e ss io n al v al u e r. A s al e b el o w t h e r e s e r v e p ri c e				



Step	Responsible	Action	Timeline	Output / Deliverable
r e q u i r e s t h e D ir e ct o r G e n e r al 's f u r t h e r w ri tt e n a p p r				



Step	Responsible	Action	Timeline	Output / Deliverable
o v a l w i t h t h e r e a s o n s r e c o r d e d.				
S E E A N N E X F o r m C 22				



Step	Responsible	Action	Timeline	Output / Deliverable
: A ss et M ai nt en a nc e, Tr a ns fe r a n d D is po sa l R ec or d C o m pl et e th e fo r m				



Step	Responsible	Action	Timeline	Output / Deliverable
at A n n e x C: St a n d ar d F or m s (F or m C 2 2) , w hi c h se ts o ut th e re q ui re d fi el d s, si				



Step	Responsible	Action	Timeline	Output / Deliverable
g n at u re s a n d a p p ro v al s fo r th is p ro ce d u re .				
S E C T I O N 3. I: K E Y				



Step	Responsible	Action	Timeline	Output / Deliverable
POINTS The Adm in Man a n a g e r h ol d s r e g i s t r y a n d c u s t				



Step	Responsible	Action	Timeline	Output / Deliverable
o di al r e s p o n si bi li t y fo r p h y si c al a ss et s; d a y to d a y u s e is s				



Step	Responsible	Action	Timeline	Output / Deliverable
e p a r a t e l y a s s i g n e d t o a n a m e d c u s t o d i a n f o r e a c h a s s e t .				



Step	Responsible	Action	Timeline	Output / Deliverable
I n s t i t u t i o n a l p r o c u r e m e n t f o l l o w s a t i e r e d m e t h o d (d ir				



Step	Responsible	Action	Timeline	Output / Deliverable
e ct p u rc h a s e, q u ot at io n s, c o m p et it iv e te n d e r) ; t h e r e q u e				



Step	Responsible	Action	Timeline	Output / Deliverable
st i n g D e p a rt m e n t id e n ti fi e s t h e n e e d, a n d a C o n tr a ct s				



Step	Responsible	Action	Timeline	Output / Deliverable
Committee, not one individual, evaluate assets and recommend				



Step	Responsible	Action	Timeline	Output / Deliverable
d s a w a r d fo r Ti e r 4 p u rc h a s e s. E v e r y p u rc h a s e h a s a				



Step	Responsible	Action	Timeline	Output / Deliverable
complete project (Table 2.1a); directorate				



Step	Responsible	Action	Timeline	Output / Deliverable
q u i r e s t h e F i n a n c e a n d A d m i n i s t r a t i o n D i r e c t o r' s w r i t t e				



Step	Responsible	Action	Timeline	Output / Deliverable
n ju st if ic at io n i n a d v a n c e, fo r a g e n ui n e e x c e p ti o n o n ly ,				



Step	Responsible	Action	Timeline	Output / Deliverable
and file sales representative sample quarterly for completion.				



Step	Responsible	Action	Timeline	Output / Deliverable
r y v e h ic le tr ip is lo g g e d a n d f u el is s u e d a g ai n st t h at lo g; p e				



Step	Responsible	Action	Timeline	Output / Deliverable
rs o n al u s e is p r o h ib it e d. p h y si c al s e c u ri t y m e a s u r e s				



Step	Responsible	Action	Timeline	Output / Deliverable
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Step	Responsible	Action	Timeline	Output / Deliverable
heredcor ds arc hiv e. The Fixed Asset Register and its ph				



Step	Responsible	Action	Timeline	Output / Deliverable
y si c al la b el li n g u s e t h e s a m e u n iq u e id e n ti fi e r, a n d it s a				



Step	Responsible	Action	Timeline	Output / Deliverable
n n u al v e ri fi c at io n is g o v e r n e d b y S e ct io n 2. 4. 4.				

3.2 Human Resources and Payroll Administration

This section covers HR administration, personnel records, recruitment and performance management, and the payroll process and its controls.

REFERENCE STANDARD *Benchmarks for this Section*

The Gambia Labour Act, as the binding national legal framework for employment matters.

Corporate governance standards for state-owned and public enterprises, as a benchmark for Board involvement in senior appointments.

Chartered Institute of Personnel and Development (CIPD) standards, as a benchmark for recruitment, performance management and personnel administration practice.

3.2.1 HR Administration Structure and Staffing

The Admin Manager leads HR administration, supported by the HR Assistant, and reports to the Finance and Administration Director. Staffing levels follow the staffing list approved by the Board as part of the annual budget (Section 2.2.2); a position outside the approved staffing list is not filled except as provided in the GAMWORKS Staff Service Rules. Recruitment of the Director General and the Directors (Category I under the Staff Service Rules) involves the Board directly, as set out at Subsection 3.2.4.

Where GAMWORKS' HR information system supports it, personnel records, leave requests, payroll change requests (Section 3.2.8) and performance agreements (Section 3.2.5) are administered digitally rather than on paper, provided the same approval chain, segregation of duties and access controls apply as to the paper-based process it replaces; a digital workflow changes the medium, not the control.

3.2.2 HR Policy Provisions

GAMWORKS' personnel policy is set out in the GAMWORKS Staff Service Rules (2021), which govern appointments and promotions, probation, conduct, discipline, leave, salaries and allowances, and separation. This Section does not repeat the Rules; it sets out the administrative, payroll and control procedures that apply them, and cross-refers to the Rules wherever a condition of service is concerned. Where this Manual and the Staff Service Rules differ on a condition of service, the Staff Service Rules prevail.

This Section's provisions cover: job descriptions and the scheme of service (Annex E); leave entitlements, which follow the Gambia Labour Act as a statutory minimum, with any GAMWORKS-specific entitlement as set out in the GAMWORKS Staff Service Rules; the Code of Conduct, set out in full at Section 4.1; the disciplinary process, which interfaces with the sanctions provisions set out in full at Part IV; and the recruitment and performance management provisions at Subsections 3.2.4 and 3.2.5.

SEE ANNEX *Form C23: Job Description*

Complete the form at Annex C: Standard Forms (Form C23), which sets out the required fields, signatures and approvals for this procedure.

3.2.3 Personnel Records Maintenance and Access Control

Personnel files are maintained by the Admin Manager and held under the same physical security standard as other confidential records (Section 3.1.4). Access is limited to the Admin Manager, the Finance and Administration Director, and the Director General; any other access requires the Finance and Administration Director's written authorisation.

3.2.4 Recruitment and Selection Procedures

Recruitment approval and the composition of the Selection Panel both differ by seniority, since a Selection Panel is convened afresh for each recruitment rather than standing permanently. In every case, the Admin Manager prepares the requisition and recommendation, and the Finance and Administration Director reviews and endorses it before it reaches the approving authority, consistent with the Admin Manager's reporting line at Section 3.2.1; the Admin Manager does not submit recruitment matters to the Director General directly. For Management, Professional and Support staff (Categories II, III and IV under the Staff Service Rules), the Director General approves the requisition and the final selection, and the ad hoc Selection Panel comprises the relevant Director, the Admin Manager, and one further Manager independent of the recruiting Department. For the Director General and the Directors (Category I), appointment is by the Board in accordance with the Staff Service Rules, following an interview by a panel of the Board.

Table 25: Recruitment Approval and Selection Panel Tiers

Position Level	Requisition Approval Chain	Selection Panel	Final Selection Approval Chain
Categories II to IV	Admin Manager prepares; Finance and Administration Director endorses; Director General approves	Relevant Director, Admin Manager, and one independent Manager	Same chain: Admin Manager recommends; Finance and Administration Director endorses; Director General approves
Category I (DG and Directors)	Board of Directors, in accordance with the Staff Service Rules	Interview panel of the Board of Directors	Board of Directors appoints

Table 26: Recruitment and Selection Process

Step	Responsible	Action	Timeline	Output / Deliverable
I	Admin Manager	Confirms the vacancy is within the approved	On a position becoming vacant or newly approved	Draft recruitment requisition

Step	Responsible	Action	Timeline	Output / Deliverable
		staffing list and prepares the recruitment requisition.		
2	Finance and Administration Director	Reviews and endorses the requisition before it proceeds to the approving authority.	Within 3 working days	Endorsed requisition
3	Approving Authority	Approves the requisition before advertisement, per the tier at Table 25.	Within 5 working days (Categories II to IV) or at the next scheduled Board meeting (Category I)	Approved requisition
4	Admin Manager	Advertises the position and receives applications.	At least 14 calendar days	Applicant pool
5	Selection Panel	Shortlists, interviews and recommends a candidate, per the panel composition at Table 25.	Within the recruitment timeline set by the Admin Manager	Selection panel recommendation
6	Finance and Administration Director	Reviews and endorses the Selection Panel's recommendation.	Within 3 working days	Endorsed recommendation
7	Approving Authority	Approves the selection and the offer terms, per the tier at Table 25.	Within 5 working days of the endorsement (Categories II to IV) or at the next scheduled Board meeting (Category I)	Approved offer

SEE ANNEX *Form C24: Recruitment Requisition and Approval*

Complete the form at Annex C: Standard Forms (Form C24), which sets out the required fields, signatures and approvals for this procedure.

3.2.5 Performance Management System

GAMWORKS operates an integrated performance management system that cascades the objectives of its approved Strategic Plan from institutional level down to individual level, rather than a standalone

annual appraisal exercise disconnected from strategy. Every individual's annual objectives can be traced back to a specific Departmental objective, and every Departmental objective to a specific Strategic Plan objective.

Table 27: Cascading Ownership of Strategic Plan Objectives

Strategic Plan Objective	Owning Role	Department
Ensure Financial Sustainability	Finance and Administration Director	Finance and Administration
Develop and Sustain Human Capital	Every Director, for their own Department	All Departments
Improve Governance, Institutional Efficiency and Project Delivery Standards	Technical Director (delivery); Finance and Administration Director (governance and efficiency)	Technical; Finance and Administration
Strengthen Institutional Visibility, Stakeholder Engagement and Public Trust	Corporate Affairs Manager	Office of the Director General

3.2.5.1 The Corporate Objective-Setting Process

Table 27 shows who owns each Strategic Plan objective; the annual management plan derived from the Strategic Plan defines, for each objective, the specific indicators, baselines, annual and multi-year targets, resources required, dependencies on other objectives or external factors, and the frequency at which progress is reviewed. The Director General consolidates the annual management plan from each Director's input and presents it to the Board alongside the annual budget (Section 2.2.2), so the two are agreed together, not separately.

Step	Responsible	Action	Output / Deliverable
1	Directors	Define indicators, baselines, annual/multi-year targets, required resources and dependencies for each owned objective, feeding into the annual management plan.	Objective-Level Plan Inputs
2	Director General	Consolidates institutional achievement against the annual management plan quarterly, distinct from the individual staff appraisal cycle at Table 28.	Quarterly Institutional Performance Report

Step	Responsible	Action	Output / Deliverable
3	Director General	Reports institutional achievement against the Strategic Plan and annual management plan to the Board annually, with corrective action proposed for any objective materially off track.	Annual Board Report on Strategic Plan Achievement

Table 28: Annual Performance Management Calendar

Period	Activity	Responsible
Q1 (start of financial year)	Departmental objectives cascaded from the Strategic Plan (Table 27); individual Performance Agreements agreed and signed	Directors, with the Admin Manager coordinating
Q1, Q2, Q3 (each quarter)	Quarterly check-in between each staff member and their supervisor	All supervisors
Q2 (mid-year)	Formal mid-year review, with any revision to objectives agreed and documented	All supervisors, consolidated by the Admin Manager
Q4 (year end)	Annual appraisal completed and rated	All supervisors
Q4 to Q1 transition	Performance Improvement Plans initiated for any rating below the satisfactory threshold; next year's objective-setting begins	Admin Manager and the relevant Director

Table 29: Performance Management Cycle

Step	Responsible	Action	Timeline	Output / Deliverable
1	Directors	Cascade Departmental objectives from the Strategic Plan (Table 27) to each individual.	Q1, within 4 weeks of financial year start	Individual Performance Agreements
2	Supervisor and Staff Member	Hold a quarterly check-in against the agreed objectives.	Once each quarter (Q1, Q2, Q3)	Quarterly Check-in Note



Step	Responsible	Action	Timeline	Output / Deliverable
3	Supervisor and Staff Member	Conduct a formal mid-year review, revising objectives where circumstances have genuinely changed.	Q2	Mid-year review record
4	Supervisor	Completes the annual appraisal and assigns a rating.	Q4	Annual Performance Appraisal Form
5	Admin Manager	Initiates a Performance Improvement Plan for any staff member rated below the satisfactory threshold.	Within 10 working days of the rating	Performance Improvement Plan

Table 30: GAMWORKS Performance Rating Scale

Rating	Definition	Consequence
Outstanding	Consistently and substantially exceeds agreed objectives	Eligible for recognition and consideration for accelerated development, per the HR provisions at Section 3.2.2
Exceeds Expectations	Regularly surpasses agreed objectives	Eligible for consideration in promotion and development planning
Meets Expectations (Satisfactory)	Fully achieves agreed objectives	No further action required beyond the normal cycle
Needs Improvement	Falls short of agreed objectives in one or more areas	Mandatory Performance Improvement Plan (below)
Unsatisfactory	Falls substantially short of agreed objectives	Mandatory Performance Improvement Plan (below), with closer supervisory involvement

INTERNAL CONTROL CHECKPOINT *Performance Improvement Plans Are Not Optional*

Where an annual rating falls below the satisfactory threshold, a Performance Improvement Plan is mandatory, not discretionary. It sets specific improvement actions, a defined review period of 60 to 90 days, and any support or training to be provided, and concludes with a documented outcome: continued employment, an extended plan, or referral to the disciplinary process.

SEE ANNEX Form C25: Individual Performance Agreement

Complete the form at Annex C: Standard Forms (Form C25), which sets out the required fields, signatures and approvals for this procedure.

SEE ANNEX Form C26: Quarterly Check-in Note

Complete the form at Annex C: Standard Forms (Form C26), which sets out the required fields, signatures and approvals for this procedure.

SEE ANNEX Form C27: Annual Performance Appraisal

Complete the form at Annex C: Standard Forms (Form C27), which sets out the required fields, signatures and approvals for this procedure.

SEE ANNEX Form C28: Performance Improvement Plan

Complete the form at Annex C: Standard Forms (Form C28), which sets out the required fields, signatures and approvals for this procedure.

3.2.6 Payroll Processing, Review and Approval Chain

Table 31: Monthly Payroll Processing Cycle

Step	Responsible	Action	Timeline	Output / Deliverable
1	HR Assistant, verified by the Admin Manager	Compiles payroll input for the month, including any approved changes (Section 3.2.9).	By a fixed date each month, set by the Finance and Administration Director	Payroll input schedule
2	Finance Manager	Processes the payroll run from the input schedule, calculating statutory and other deductions.	Within 3 working days of receiving the schedule	Draft payroll
3	Finance and Administration Director	Reviews and approves the payroll before payment.	Within 2 working days	Approved payroll

Step	Responsible	Action	Timeline	Output / Deliverable
4	Finance Manager	Processes payment, issues payslips, and reconciles against the approved staffing list (Section 3.2.9).	On the agreed pay date	Payroll paid; payslips issued; reconciliation report

Gross pay for each staff member is subject to statutory deductions before net pay is calculated: Social Security and Housing Finance Corporation (SSHFC) contributions, at the rate prescribed under the SSHFC Act, and Pay As You Earn (PAYE) income tax, at the rate prescribed by the Gambia Revenue Authority (GRA). GAMWORKS remits both its own employer contribution and the amounts withheld from staff to SSHFC and GRA respectively by their statutory deadlines, and issues every staff member a payslip itemising gross pay, each deduction, and net pay.

Table 32: Statutory Payroll Remittance

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Calculates SSHFC and PAYE deductions as part of the monthly payroll run (Table 31).	Same cycle as Table 31	Statutory deduction schedule
2	Finance Manager	Remits employee and employer SSHFC contributions to SSHFC.	By SSHFC's statutory deadline	SSHFC remittance receipt
3	Finance Manager	Remits PAYE withheld to the Gambia Revenue Authority.	By GRA's statutory deadline	GRA remittance receipt
4	Finance and Administration Director	Reviews both remittance confirmations against the payroll run.	Within 5 working days	Reviewed remittance file

SEE ANNEX *Form C29: Payslip*

Complete the form at Annex C: Standard Forms (Form C29), which sets out the required fields, signatures and approvals for this procedure.

3.2.7 Segregation of Duties Between HR and Finance

INTERNAL CONTROL CHECKPOINT *HR Data, Finance Payment*

The Admin Manager maintains personnel and payroll input data; the Finance Manager processes payment from that data. Neither role holds both, consistent with the segregation of duties principle at Section 2.4.I, so that no single person can both create a payroll change and pay it.

3.2.8 Payroll Change Control and Authorisation

Table 33: Payroll Change Authorisation

Step	Responsible	Action	Timeline	Output / Deliverable
1	Admin Manager	Submits a payroll change request (new hire, exit, salary change, promotion).	As the change arises	Payroll change request
2	Finance and Administration Director	Verifies the change against the approved staffing list and the terms of service under the Staff Service Rules, and authorises it.	Within 5 working days	Authorised payroll change
3	Finance Manager	Applies the change in the payroll system ahead of the next processing cycle.	Before the next Table 31 cycle	Payroll system updated

SEE ANNEX *Form C30: Payroll Change Request*

Complete the form at Annex C: Standard Forms (Form C30), which sets out the required fields, signatures and approvals for this procedure.

3.2.9 Payroll Reconciliation Against the Approved Staffing List

Table 34: Monthly Payroll Reconciliation

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Reconciles the paid headcount and cost against the Board-approved staffing list and budget (Section 2.2.2).	Monthly, following payment	Payroll reconciliation report

Step	Responsible	Action	Timeline	Output / Deliverable
2	Finance and Administration Director	Reviews any variance against the approved staffing list.	Within 5 working days	Reviewed reconciliation

SECTION 3.2: KEY POINTS

HR administration sits with the Admin Manager under the Finance and Administration Director; staffing follows the Board-approved staffing list.

Conditions of service, leave and discipline are governed by the GAMWORKS Staff Service Rules (2021); this Manual sets out the procedures that apply them.

Recruitment of Management, Professional and Support staff is approved by the Director General; the Director General and the Directors (Category I) are appointed by the Board, in accordance with the Staff Service Rules.

Performance management cascades Strategic Plan objectives through Departments to individuals, on a fixed quarterly and annual calendar, against a five-point rating scale (Table 30), with mandatory Performance Improvement Plans below the satisfactory threshold.

Payroll runs on a fixed monthly cycle with statutory SSHFC and PAYE remittance, HR/Finance segregation of duties, controlled changes, and reconciliation against the approved staffing list.

3.3 Capacity Development, Training and Competency Framework

This section is GAMWORKS' single framework for capacity development, covering every member of staff, technical and administrative. It sets out the competency framework, competency standards by role, training needs assessment, the annual training and capacity development plan, delivery and records, mentoring and knowledge transfer, succession for key positions, professional certification, and the evaluation of learning outcomes.

Capacity development is a human resources function. The Technical Director manages capacity development for technical staff, in consultation with the Finance and Administration Director; the Finance and Administration Director manages it for finance and administration staff; and the Admin Manager, supported by the HR Assistant, coordinates the annual plan, its budget, logistics and training records for the whole Agency. The Technical Manual of Procedures refers to this section and does not repeat it.

REFERENCE STANDARD *Benchmarks for this Section*

Chartered Institute of Personnel and Development (CIPD) standards, as a benchmark for training needs assessment and evaluation practice. The GAMWORKS Staff Service Rules, for training entitlements, study leave and related conditions of service.

3.3.1 Roles in Capacity Development

Table 35a: Roles in Capacity Development

Role	Responsibility	Reference
Director General	Approves the competency framework, competency standards by role, and the annual training and capacity development plan within the approved budget; reviews succession coverage for key positions.	3.3.2, 3.3.3, 3.3.5, 3.3.8
Technical Director	Leads competency standards, needs assessment, mentoring, certification and learning evaluation for technical staff, in consultation with the Finance and Administration Director.	3.3.2 to 3.3.10
Finance and Administration Director	Leads the same functions for finance and administration staff; consolidates the Agency-wide plan with the Technical Director before submission to the Director General.	3.3.2 to 3.3.10
Admin Manager	Coordinates the needs assessment, prepares and costs the consolidated plan, organises delivery, and maintains training records and Individual Learning Records, supported by the HR Assistant.	3.3.4 to 3.3.7
Supervisors	Provide evidence for the needs assessment, act as mentors, and confirm whether training has improved performance.	3.3.4, 3.3.7, 3.3.10
Staff member	Completes a self-assessment against the role standard, takes part in agreed training, and keeps their Individual Learning Record up to date.	3.3.4, 3.3.6

3.3.2 GAMWORKS Competency Framework

Every competency the two Manuals assume staff hold is named in one framework and mapped to the Part of the Manual that governs it in practice, so capacity development has a clear reference point rather than a generic list of skills. Technical domains are led by the Technical Director; finance and administration domains by the Finance and Administration Director.

Table 35b: GAMWORKS Competency Framework



Competency Domain	Lead	Governed By
Project cycle management	Technical Director	Technical Manual, Part 2
Procurement of works, goods and consultancy services	Technical Director	Technical Manual, Part 3
Contract management and supervision	Technical Director	Technical Manual, Section 3.7
Project risk management	Technical Director	Technical Manual, Section 2.7
Grant management	Technical Director	Technical Manual, Part 4
Environmental and social safeguards (ESMS)	Technical Director	Technical Manual, Part 5
Gender, social inclusion and SEAH	Technical Director	Technical Manual, Part 6
Grievance redress	Technical Director	Technical Manual, Part 7
Monitoring, evaluation and learning	Technical Director	Technical Manual, Part 8
Stakeholder engagement	Technical Director	Technical Manual, Section 5.6
Quality assurance	Technical Director	Technical Manual, Part 9
Child safeguarding	Technical Director	Technical Manual, Part 10
Financial management, accounting and reporting	Finance and Administration Director	This Manual, Part II
Treasury, payments and cash management	Finance and Administration Director	This Manual, Section 2.3
Institutional procurement and asset management	Finance and Administration Director	This Manual, Section 3.1
Human resources and payroll administration	Finance and Administration Director	This Manual, Section 3.2
Integrity, AML/CFT and conflict of interest	Finance and Administration Director	This Manual, Part IV
IT systems and records management	Finance and Administration Director	This Manual, Section 3.4 and Part V

REFERENCE STANDARD *The GAMWORKS Competency Level Scale*

Competency Domain	Lead	Governed By
Level 1, Awareness: knows the domain exists and where to find the governing procedures. Level 2, Working Knowledge: follows the procedures under supervision. Level 3, Practitioner: runs the procedures independently, to the standard the Manuals set. Level 4, Expert: runs the procedures independently and trains or reviews the work of others. Level 5, Institutional Lead: sets and updates GAMWORKS' own standard for the domain and represents it externally. The same scale applies to every domain, so a role's requirement is always stated as one of these five levels.		

SEE ANNEX *Form C45: Competency Framework Matrix*

Complete the form at Annex C: Standard Forms (Form C45), which sets out the required fields, signatures and approvals for this procedure.

3.3.3 Competency Standards by Role

Each position on the approved staffing list carries a defined competency standard: the level expected in each relevant domain, stated against the five-level scale. Standards are recorded with the job description for the position (Annex E) and reviewed against the certification pathways at Subsection 3.3.9.

Table 35c: Setting Competency Standards

Step	Responsible	Action	Timeline	Output / Deliverable
I	Technical Director and Finance and Administration Director	Define the competency standard for each position in their Departments, against the domains at Table 35b.	Within the first quarter of each financial year, or on creation of a new position	Draft role competency standards



Step	Responsible	Action	Timeline	Output / Deliverable
2	Admin Manager	Consolidates the standards and checks them against the job descriptions at Annex E and the Staff Service Rules.	Within 10 working days	Consolidated standards
3	Director General	Approves the role competency standards.	Within 10 working days	Approved standards

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e v el 3) i n p r oj e ct c y cl e m a n a g e m e n t, p r o c u r e m e n t a n				



Step	Responsible	Action	Timeline	Output / Deliverable
d c o n tr a ct m a n a g e m e n t. S af e g u a r d s fo c al p oi n ts : P r a ct				



Step	Responsible	Action	Timeline	Output / Deliverable
it io n e r (L e v el 3) i n E S M S, g e n d e r, s o ci al i n cl u si o n a n d S E				



Step	Responsible	Action	Timeline	Output / Deliverable
A H . Fi n a n c e M a n a g e r: E x p e rt (L e v el 4) i n fi n a n ci al m a n				



Step	Responsible	Action	Timeline	Output / Deliverable
a g e m e n t a n d tr e a s u r y. A d m i n M a n a g e r: P r a ct it io n e r				



Step	Responsible	Action	Timeline	Output / Deliverable
(Level 3) information resource and payroll rolldadmissionistratio				



Step	Responsible	Action	Timeline	Output / Deliverable
n a n d i n i n st it u ti o n al p r o c u r e m e n t. D ir e ct o rs : E x p e rt				



Step	Responsible	Action	Timeline	Output / Deliverable
(L e v el 4) a cr o ss t h e d o m ai n s t h ei r D e p a rt m e n t le a d s.				



Step	Responsible	Action	Timeline	Output / Deliverable
INTERNAL CONTROL CHECKPOINT o m pe te nc y R eq ui re m en				



Step	Responsible	Action	Timeline	Output / Deliverable
t fo r C o m m itt ee M e m be rs hi p M e m b e rs hi p of t h e T e c h n ic al R e vi				



Step	Responsible	Action	Timeline	Output / Deliverable
e w C o m m it te e a n d t h e G r a n t R e vi e w C o m m it te e u n d e r t				



Step	Responsible	Action	Timeline	Output / Deliverable
h e T e c h n ic al M a n u al of P r o c e d u r e s, a n d of t h e C o n t r a c t				



Step	Responsible	Action	Timeline	Output / Deliverable
s C o m m it te e u n d e r S e ct io n 3. I. 2, r e q ui r e s P r a ct it io n e r (L				



Step	Responsible	Action	Timeline	Output / Deliverable
e v el 3) o r h ig h e r i n t h e r el e v a n t d o m ai n. T h e D ir e ct o r w				



Step	Responsible	Action	Timeline	Output / Deliverable
h o a p p oi n ts t h e m e m b e r v e ri fi e s t h e le v el a g ai n st t h e m				



Step	Responsible	Action	Timeline	Output / Deliverable
e m b e r' s I n di vi d u al L e a r n i n g R e c o r d (S u b s e ct io n 3. 3. 6)				



Step	Responsible	Action	Timeline	Output / Deliverable
b ef o r e a p p oi n t m e n t.				

SEE ANNEX *Form C46: Role Competency Assessment*

Complete the form at Annex C: Standard Forms (Form C46), which sets out the required fields, signatures and approvals for this procedure.

3.3.4 Training Needs Assessment

Training needs are identified once a year, against the role standards at Subsection 3.3.3, from four sources: each staff member's self-assessment; the development needs recorded in the Individual Performance Agreement and Annual Performance Appraisal (Section 3.2.5); capability gaps a Director identifies against the Department's Strategic Plan objectives (Table 27); and lessons learned under the Technical Manual of Procedures and from audit findings. The Technical Director assesses technical staff and the Finance and Administration Director assesses finance and administration staff; the Admin Manager consolidates the results into one Agency-wide training needs assessment.

Self-assessment is supplemented, not replaced, by evidence from supervisors, observed performance, file reviews, audit or evaluation findings, and stakeholder feedback, recorded in the evidence column of Form C47.

INTERNAL CONTROL CHECKPOINT *Critical Competency Gaps*

A gap in a critical fiduciary or safeguards competency (financial management, procurement, grant management, environmental and social safeguards, SEAH) is given time-bound priority for closure and is not queued behind routine development needs. Until the gap closes, the responsible Director records in writing who may perform the affected control in the interim, and on what basis.

SEE ANNEX *Form C47: Training Needs Assessment*

Complete the form at Annex C: Standard Forms (Form C47), which sets out the required fields, signatures and approvals for this procedure.

3.3.5 Annual Training and Capacity Development Plan and Budget

The consolidated needs assessment is turned into one funded Annual Training and Capacity Development Plan for the Agency, costed and submitted as part of the annual budget (Section 2.2.2). The plan distinguishes mandatory compliance training, required of every staff member, from technical and professional development training, and includes budgeted support for professional certification (Subsection 3.3.9).

INTERNAL CONTROL CHECKPOINT *Mandatory Compliance Training*

Every staff member completes training on gender equality, Sexual Exploitation, Abuse and Harassment (SEAH), integrity and whistleblower protection, Prohibited Practices, conflicts of interest, sanctions screening and suspicious-activity escalation at induction and at a minimum refresh frequency set by the Finance and Administration Director, on the Admin Manager's recommendation. Contractors and implementing entities complete the same training wherever their role gives them a reasonable likelihood of exposure to these risks, applying the scope clause at Section 1.1.2. The substantive policies are set out at Part IV and are not repeated here.

Table 35: Annual Training Cycle

Step	Responsible	Action	Timeline	Output / Deliverable
I	Admin Manager	Consolidates the training needs assessment from the Technical Director and the Finance and Administration Director.	Q4, ahead of annual budget preparation	Agency-wide training needs assessment

Step	Responsible	Action	Timeline	Output / Deliverable
2	Admin Manager	Prepares and costs the Annual Training and Capacity Development Plan, distinguishing mandatory compliance training from development training.	As part of the annual budget cycle (Section 2.2.2)	Draft plan
3	Technical Director and Finance and Administration Director	Review the plan for their Departments and endorse it jointly.	Within 5 working days	Endorsed plan
4	Director General	Approves the plan within the annual budget.	Per Section 2.2.2's approval chain	Approved plan
5	Admin Manager	Schedules and coordinates delivery, tracking completion by staff member.	Throughout the financial year	Training Completion Register

SEE ANNEX *Form C51: Annual Training and Capacity Development Plan*

Complete the form at Annex C: Standard Forms (Form C51), which sets out the required fields, signatures and approvals for this procedure.

3.3.6 Training Delivery and Individual Learning Records

The Admin Manager organises delivery of the approved plan, internally or through external providers, in liaison with the Technical Director for technical training. Every staff member's training, certification and mentoring history is held in a single Individual Learning Record, maintained by the HR Assistant under the Admin Manager and filed with the personnel record (Section 3.2.3). The staff member reviews the record at least once a year, and the records inform the next needs assessment. Curricula, attendance records, assessments and certificates are retained under the retention schedule at Section 3.4.1.

SEE ANNEX *Form C31: Training Completion Register; Form C49: Individual Learning Record*

Complete the forms at Annex C: Standard Forms (Form C31, Form C49), which set out the required fields, signatures and approvals for this procedure.

3.3.7 Mentoring, Knowledge Transfer and Communities of Practice

Competency is also transferred person to person, particularly for roles that depend on judgement built up over time. The Technical Director and the Finance and Administration Director each pair less experienced staff with experienced mentors in their Departments, particularly ahead of committee membership, and mentors record sessions and agreed follow-up actions.

INTERNAL CONTROL CHECKPOINT *Knowledge Transfer Before Departure*

Before a staff member in a procurement, safeguards, grievance redress, treasury or payroll role leaves or changes role, the responsible Director ensures a documented handover and knowledge transfer to the successor or an identified colleague, so that the Agency does not lose that judgement suddenly.

The Technical Director convenes Communities of Practice at least quarterly for procurement, safeguards (ESMS, gender and SEAH), and monitoring and evaluation, open to all staff working in those domains. Significant points raised feed into the lessons learned process under the Technical Manual of Procedures and into the next needs assessment.

SEE ANNEX *Form C48: Mentoring and Knowledge Transfer Record*

Complete the form at Annex C: Standard Forms (Form C48), which sets out the required fields, signatures and approvals for this procedure.

3.3.8 Succession and Continuity for Key Positions

The Director General identifies the positions that would carry institutional risk if vacated unexpectedly, at minimum the Directors, the Finance Manager, the Admin Manager, the Internal Auditor, safeguards focal points and grant coordinators. For each, the responsible Director records the minimum competency required, the current gap if any, and a continuity measure (a deputy, a cross-trained colleague, or a documented handover procedure), and agrees a development plan with one or more potential successors, built into the Annual Training and Capacity Development Plan. The Director General reviews succession coverage at least once a year.

MANUAL BOUNDARY *Development, Not a Guarantee of Appointment*

A succession development plan prepares a potential successor to compete for a key position when it becomes vacant. It does not guarantee the appointment, which follows the recruitment procedure at Section 3.2.4 and the GAMWORKS Staff Service Rules.

3.3.9 Professional Certification

Certification gives GAMWORKS' own competency standards an external benchmark and gives staff a recognised qualification. The lead Director identifies the relevant pathway for each domain; support for certification is a budgeted line in the Annual Training and Capacity Development Plan, granted in line with the Staff Service Rules, and certifications held are recorded in the Individual Learning Record.

Table 35d: Illustrative Professional Certification Pathways

Competency Domain	Illustrative Certification	Lead
Project cycle management	PMP or PRINCE2	Technical Director
Procurement and contract management	A recognised procurement or contract management certification	Technical Director
Environmental and social safeguards	A recognised environmental and social safeguards certification	Technical Director
Gender, social inclusion and SEAH	A recognised gender and safeguarding certification	Technical Director
Monitoring and evaluation	A recognised monitoring and evaluation certification	Technical Director
Financial management and accounting	A recognised professional accountancy qualification	Finance and Administration Director
Human resources administration	A recognised human resources qualification	Finance and Administration Director
Internal audit	A recognised internal audit certification	Director General

3.3.10 Evaluation of Learning Outcomes

Training is judged by whether it changed performance, not by whether it was attended. The lead Director evaluates significant training against pre- and post-training assessment or on-the-job performance indicators and reports the findings to the Director General, who uses them to adjust the next needs assessment and plan. The Admin Manager reports training completion rates to the Finance and Administration Director at least quarterly, with particular attention to mandatory compliance training, and the Finance and Administration Director escalates any material gap to the Director General.



INTERNAL CONTROL CHECKPOINT *Measuring Competence, Not Attendance*

Mandatory compliance training is assessed by a short test or practical exercise, not by attendance alone, and a staff member who does not reach the pass standard repeats the training. Completion and results are recorded in the Training Completion Register and the Individual Learning Record.

SEE ANNEX *Form C50: Learning Outcome Evaluation*

Complete the form at Annex C: Standard Forms (Form C50), which sets out the required fields, signatures and approvals for this procedure.

SECTION 3.3: KEY POINTS

There is one capacity development framework for the whole Agency. The Technical Director leads it for technical staff, in consultation with the Finance and Administration Director, who leads it for finance and administration staff; the Admin Manager coordinates the plan, budget and records.

Eighteen competency domains, each mapped to the procedures that govern them, are assessed on one five-level scale, with a defined standard for every position.

Training needs are assessed annually from self-assessment, supervisor evidence, appraisals, Strategic Plan gaps and lessons learned; critical fiduciary and safeguards gaps are closed first.

One Annual Training and Capacity Development Plan, approved by the Director General within the budget, covers mandatory compliance training, development training and certification support.

Mentoring, knowledge transfer before departure, succession planning for key positions and evaluation of learning outcomes close the loop back to the next needs assessment.

3.4 Records Management, Document Retention and Public Disclosure

This section covers how GAMWORKS classifies, stores and retains its records, and what it discloses publicly, completing Part III.

REFERENCE STANDARD *Benchmarks for this Section*

The Gambia Access to Information Act, for public disclosure obligations.

ISO 15489 (Records Management), as a benchmark for retention and disposal practice.

3.4.1 Records Classification and Retention Schedule

Records are classified by type (financial, project/DMC, personnel, procurement, governance) and held for a minimum retention period before disposal is considered. The Admin Manager maintains the retention schedule; the Finance and Administration Director approves any disposal ahead of the retention period's expiry.

Table 36: Minimum Retention Periods

Record Type	Minimum Retention Period	Basis
Financial records and supporting documents (Sections 2.1 to 2.5)	10 years from the financial year end	External audit and development partner/DMC audit rights
Personnel records (Section 3.2.3)	7 years from the end of employment	Labour Act limitation periods
Governance records (Board and Audit Committee minutes, Sections 1.2.5 and 5.2)	Permanent	Institutional record
Procurement records (Sections 2.4.3 and 3.1.2)	10 years from contract completion	Gambia Public Procurement Act 2022
Due diligence, sanctions and beneficial-ownership records (Section 4.2.2)	5 years from the end of the relationship, or the longest applicable law/financing-agreement period if longer	AML/CFT and financing-agreement requirements
Grant and project appraisal files (Technical Manual of Procedures)	10 years from project or DMC closure	Development partner/DMC audit rights
Monitoring and evaluation data	10 years from project or DMC closure	Development partner reporting requirements
Complaints, whistleblower and investigation files (Section 4.3)	10 years from case closure, held under the confidentiality standard at Section 4.3.2	Legal hold and institutional record
Training records (Section 3.3)	7 years from the training date, or the end of employment if longer	Competency evidence
System access logs (Section 5.1)	3 years	IT security review

Record Type	Minimum Retention Period	Basis
Development partner correspondence	10 years from the end of the financing relationship	Development partner audit rights

Where a record type is subject to more than one of the periods above, the applicable law, the financing agreement, an active audit, investigation or legal hold, and the schedule in Table 36, GAMWORKS retains it for the longest of these, not the shortest.

REFERENCE STANDARD *Minimum Fields for Every Record Category*

Owner (the role responsible for the record); format (physical, electronic, or both); indexing method; access restriction; required retrieval time; secure transfer method where the record moves between locations or custodians; and evidence retained of destruction once the retention period expires and no hold applies.

3.4.2 Physical and Electronic Storage

Physical records are held under the security standard at Section 3.1.4. Electronic records are held on GAMWORKS' IT systems under the access controls at Section 5.1, with a backup regime sufficient to reconstruct financial records in the event of loss.

3.4.3 Document Disposal Procedures

Table 37: Records Disposal

Step	Responsible	Action	Timeline	Output / Deliverable
1	Records Officer	Identifies records that have passed their minimum retention period and prepares a disposal schedule.	Annually	Draft disposal schedule
2	Finance and Administration Director	Reviews the schedule, confirming no record is subject to an open audit, legal hold, or ongoing development partner/DMC query.	Within 10 working days	Approved disposal schedule
3	Admin Manager	Disposes of the records by secure destruction and logs the disposal.	Following approval	Disposal log

INTERNAL CONTROL CHECKPOINT *Legal Hold Overrides Retention Schedule*

A record subject to an ongoing audit, investigation, legal proceeding, or unresolved development partner/DMC query is never disposed of on schedule; the Finance and Administration Director places it under a legal hold until the matter concludes, regardless of how long that extends its retention beyond Table 36.

3.4.4 Public Disclosure of Institutional Information

GAMWORKS proactively publishes institutional information rather than disclosing only on request. The Corporate Affairs Manager owns this publication regime, maintains the institutional website as the primary publication location, and confirms the format, language and publication deadline for each category of information. At minimum, GAMWORKS publishes its audited annual financial statements and audit opinion within a reasonable, fixed period of the Board receiving them, applying Section 2.1.4. This Manual's own provisions are internal; nothing in this Subsection requires disclosure of the Manual itself, the Delegation of Authority Matrix (Annex B), or other internal control documents, unless the Board specifically decides otherwise.

Information Published	Owner	Deadline
Audited annual financial statements and audit opinion	Corporate Affairs Manager, with Finance	Within 30 days of Board receipt
Procurement opportunities and awards (institutional and, per the Technical Manual of Procedures, project/DMC)	Admin Manager (institutional); Technical Department (project/DMC)	At the point of publication/award
Grant beneficiaries and results, per the Technical Manual of Procedures	Technical Department	Per the Technical Manual of Procedures' own cycle
Investigation function terms of reference and case-processing guidelines (not case-level detail)	Internal Auditor	Kept current; republished on any material change
Whistleblower reporting channels	Internal Auditor	Kept current
Evaluation reports and project-level disclosures, per the Technical Manual of Procedures	Technical Department	Per the Technical Manual of Procedures' own cycle

Publication is subject only to lawful exceptions: information whose disclosure is restricted by law, by a financing agreement's confidentiality terms, or by the survivor-centred confidentiality standard at Section 4.3 for any whistleblower or investigation matter.

SECTION 3.4: KEY POINTS

Records are classified by type with minimum retention periods (Table 36) ranging from 7 years (personnel) to permanent (governance records).

A legal hold on a record subject to audit, investigation, or unresolved query overrides the normal retention schedule.

Disposal is a controlled process: Admin Manager identifies, Finance and Administration Director approves, disposal is logged.

Public disclosure follows the Gambia Access to Information Act; this Manual and its internal control annexes are not, by default, public documents.



GAMBIAN AGENCY FOR THE MANAGEMENT
OF PUBLIC WORKS

PART

IV

PART IV: INTEGRITY, ETHICS AND ANTI-MONEY LAUNDERING

This Part covers GAMWORKS' Code of Conduct and conflict of interest management, anti-money laundering and sanctions screening, and the internal, staff-facing integrity and whistleblower protection framework.

This Part covers GAMWORKS' internal, staff-facing grievance and integrity mechanism. It is distinct from the project or community-facing Grievance Redress Mechanism under the institutional Environmental and Social Management System, which remains governed by the Technical Manual of Procedures per the boundary set at Subsection 1.1.3; the two mechanisms are not the same and are not interchangeable.

4.1 Code of Ethics and Conflict of Interest

This section sets out the standards of conduct expected of every GAMWORKS staff member and Board member, how conflicts of interest are declared and managed, and the disciplinary framework that applies when those standards are not met.

REFERENCE STANDARD *Benchmarks for this Section*

The Gambia Public Service Code of Conduct, as a benchmark for public sector integrity standards.

FATF guidance and COSO's Internal Control Integrated Framework, as benchmarks for the AML/CFT provisions at Section 4.2.

4.1.1 Code of Conduct Principles

Every GAMWORKS staff member and Board member is expected to act with integrity, objectivity, and impartiality in every GAMWORKS transaction, to treat public and development partner resources as a trust rather than as GAMWORKS' own, and to avoid any conduct that would embarrass the Agency or undermine confidence in its fiduciary standing. The Code of Conduct applies equally regardless of seniority; the Director General and the Board are held to it as fully as the most junior member of staff.

The Code of Conduct's binding scope extends, through the anchor clause at Section 1.1.2, to every consultant, expert, contractor and other functionally related party engaged by or through GAMWORKS. Each completes induction on the Code before starting work, acknowledges it periodically (at minimum annually, and on any material contract renewal), and accepts it as an incorporated contractual term, not a document provided for information only.

REFERENCE STANDARD *Ethics Function*

The Finance and Administration Director serves as GAMWORKS' ethics focal point, providing an advice channel for staff uncertain how the Code applies to a specific situation; the Internal Auditor reports ethics matters to the Audit Committee.

This advice role is kept separate from the disciplinary and whistleblower tracks: seeking advice before acting is never itself treated as an admission requiring disciplinary referral.

4.1.2 Conflict of Interest Declaration and Management

A conflict of interest arises whenever a staff member's or Board member's personal, family or financial interest could reasonably be seen to influence a GAMWORKS decision, most often in procurement, recruitment, or the award of a DMC or development partner-financed contract. GAMWORKS manages conflicts by declaration and recusal rather than by informal management, so that a declared conflict is a matter of record rather than a private arrangement between individuals.

INTERNAL CONTROL CHECKPOINT *Declaration Is Continuous, Not Only Annual*

Every staff member and Board member also completes an annual conflict of interest declaration, whether or not any conflict has arisen that year, so that a nil return is itself a matter of record. An annual declaration does not replace the requirement to declare a specific conflict as soon as it arises, at Table 38 below; the two obligations are separate and both apply.

This declaration and recusal obligation extends to consultants, evaluation/selection/Contracts Committee members, investigators, and grant decision-makers, not only staff and Board members, applying Section I.I.2.

REFERENCE STANDARD *Defining a Conflict*

An actual conflict exists now; a potential conflict could reasonably arise from a known interest; a perceived or apparent conflict would reasonably appear to a third party to compromise objectivity, whether or not it actually does. All three are declared; GAMWORKS does not wait to confirm an actual conflict before requiring disclosure.

Certain financial interests (for example, an ownership stake in a current or prospective GAMWORKS contractor or grantee) are prohibited outright for staff in a position to influence the relevant decision, not merely declarable.

Declarations are made pre-appointment, annually, and immediately on any event that creates a new conflict, not only at the two fixed points above. A determination under Table 38 is recorded in the register and may be reviewed by the Director General on request. The register is accessible to the Audit Committee and, on request, to Internal Audit; a recusal is recorded in the minutes of the meeting or decision it applied to, and failure to disclose a conflict is itself a disciplinary matter under Section 4.I.5. Where the official who would normally determine a conflict is themselves conflicted, the determination passes to the next most senior uninvolved officer (or, for a conflicted Director General, the Board Chair).

Table 38: Conflict of Interest Declaration and Management



Step	Responsible	Action	Timeline	Output / Deliverable
1	Staff Member or Board Member	Declares a potential conflict as soon as it is identified, before participating in the relevant decision.	Before the decision, not after	Conflict of Interest Declaration
2	Finance and Administration Director assesses and recommends; Director General determines (staff); Board Chair determines (Board members)	Assesses the declared conflict and determines whether it requires recusal, restriction, or no action.	Within 5 working days	Documented determination
3	Admin Manager records the determination in the Conflict of Interest Register, which the Internal Auditor reports to the Audit Committee.	At each scheduled Audit Committee meeting	Conflict of Interest Register	

SEE ANNEX Form C32: Conflict of Interest Declaration

Complete the form at Annex C: Standard Forms (Form C32), which sets out the required fields, signatures and approvals for this procedure.

4.1.3 Gifts, Hospitality and Outside Interests

Gifts and hospitality connected to a GAMWORKS role are declared in the same register as conflicts of interest, whether or not they are accepted. Cash or cash-equivalent gifts are never accepted in any circumstance.

Table 39: Gift and Hospitality Thresholds

Value	Treatment
Below a nominal threshold set by the Director General (e.g., a token item of negligible value)	May be accepted without declaration, at the recipient's discretion
Above the nominal threshold, up to a moderate threshold set by the Director General	Must be declared in the register; the Finance and Administration Director determines whether it may be retained or must be surrendered to GAMWORKS

Value	Treatment
Above the moderate threshold, or any cash or cash-equivalent gift	Never accepted, regardless of the circumstances or relationship

4.1.4 Gender Equality and SEAH Policy

GAMWORKS does not tolerate discrimination on the basis of gender, and does not tolerate Sexual Exploitation, Abuse and Harassment (SEAH) in any form, whether between staff members, or between staff and any contractor, beneficiary, or member of the public GAMWORKS interacts with in the course of its work. Every allegation is treated as a disciplinary matter under Subsection 4.1.5 and, depending on its nature, may also be a matter for referral to law enforcement; the two are not mutually exclusive, and a disciplinary process does not wait on the outcome of a criminal process to begin.

INTEGRITY & AML ALERT *Reporting Channel*

An allegation of gender discrimination or SEAH is reported through the whistleblower channels at Section 4.3.2, not informally to a supervisor, so that it is recorded and independently handled regardless of the alleged offender's seniority.

4.1.5 Disciplinary Framework and Sanctions

Disciplinary matters are tiered by severity, with the tier determining who hears the matter and what sanctions are available, so that a minor infraction and a serious integrity breach are never processed through the same track.

INTEGRITY & AML ALERT *Zero-Tolerance Statement*

GAMWORKS has zero tolerance for fraudulent, corrupt, coercive, collusive and obstructive practices, abuse, retaliation, and money laundering or terrorist financing, defined consistently with the definitions used by GAMWORKS' development partners.

Fraudulent: any act or omission intended to deceive for financial or other benefit. Corrupt: offering, giving, receiving or soliciting anything of value to improperly influence a decision.

Coercive: impairing or harming a party to influence its actions. Collusive: an arrangement between two or more parties to achieve an improper purpose. Obstructive: destroying, falsifying or withholding evidence, or materially impeding an investigation.

Employment discipline (Table 40) is one remedy track among several, not the only one. Depending on the conduct, GAMWORKS also pursues, in parallel and not sequentially: contractual remedies (suspension, termination, recovery); civil remedies; administrative remedies (debarment, referral to a regulator); and criminal remedies (referral to law enforcement). Pursuing one track does not require completing another first.

INTEGRITY & AML ALERT *Protective Action Is Not Delayed by Due Process*

Due process and proportionality govern every disciplinary and remedial track, but an interim protective measure, suspension from duties, restricted system access, evidence preservation, is taken immediately where risk requires it, without waiting for the full process to conclude.

Table 40: Disciplinary Tiers and Sanctions

Tier	Nature of Conduct	Heard By	Available Sanctions
Minor	First instance of a policy or procedural breach with no financial loss or integrity dimension	Direct supervisor, with Admin Manager advice	Verbal or written warning
Serious	Repeated breaches, a breach causing financial loss, or a conflict of interest violation	Finance and Administration Director, with a disciplinary panel (below)	Written warning, suspension, or a Performance Improvement Plan under Section 3.2.5
Gross Misconduct	Fraud, theft, SEAH, or any AML/CFT violation	Director General, on the disciplinary panel's recommendation	Summary dismissal, and referral to law enforcement where the conduct may be criminal

Disciplinary Panel Composition. The disciplinary panel referred to in Table 40 is convened afresh for each Serious or Gross Misconduct matter, in the same manner as the Selection Panel (Section 3.2.4) and the Contracts Committee (Section 3.1.2), rather than standing permanently. It comprises the Finance and Administration Director (chair, or the Director General where the Finance and Administration Director is implicated in the matter), the Admin Manager, and one further Manager independent of the accused staff member's Department. Where the matter concerns a Director, the Director General chairs in place of the Finance and Administration Director, and a second Director sits on the panel in place of the independent Manager.

SEE ANNEX *Form C33: Disciplinary Case Record*

Complete the form at Annex C: Standard Forms (Form C33), which sets out the required fields, signatures and approvals for this procedure.

SECTION 4.1: KEY POINTS

The Code of Conduct applies equally regardless of seniority; conflicts of interest are managed by declaration and recusal, recorded in a register maintained by the Admin Manager and reviewed by the Internal Auditor.

Gifts and hospitality above a nominal threshold are declared; cash or cash-equivalent gifts are never accepted.

Gender discrimination and SEAH are zero-tolerance, reported through whistleblower channels rather than informally, and do not wait on a criminal process to trigger disciplinary action.

Discipline is tiered (Table 40): minor matters stay with the supervisor, serious matters go to the Finance and Administration Director and a panel, and gross misconduct goes to the Director General.

4.2 Anti-Money Laundering, Countering the Financing of Terrorism and Sanctions Screening

This section covers GAMWORKS' AML/CFT policy, how it screens counterparties, how it identifies and reports suspicious activity, and how it keeps AML/CFT records.

REFERENCE STANDARD *Benchmarks for this Section*

FATF (Financial Action Task Force) recommendations, as the international benchmark for AML/CFT practice.

The Gambia Anti-Money Laundering and Combating of Terrorist Financing Act 2012, as amended, as the binding national legal framework.

4.2.1 AML/CFT Policy Statement

GAMWORKS does not knowingly transact with any individual or entity engaged in money laundering or the financing of terrorism, and applies a risk-based approach to screening its counterparties: contractors, suppliers, and any other party GAMWORKS makes a payment to or receives funds from, proportionate to the value and nature of the transaction rather than uniformly onerous for every payment GAMWORKS makes.

INTEGRITY & AML ALERT *Legal Citation Confirmation Required*

The Finance and Administration Director is GAMWORKS' designated AML/CFT Compliance Officer, with the Finance Manager as the named alternate for periods of absence. The Director has the authority and system access needed to perform this role, and leads GAMWORKS' periodic institutional AML/CFT risk assessment (at least every two years, or sooner following a material

change in GAMWORKS' operations or counterparty profile), from which risk-based controls, ongoing monitoring, and staff advice and training needs are derived. Breaches of this policy are reported to the Finance and Administration Director and the Internal Auditor, who reports them to the Audit Committee; Internal Audit provides independent assurance over the design and operation of the AML/CFT programme as a whole, applying Section 1.2.6.

INTEGRITY & AML ALERT *Proportionality Has Limits*

A risk-based, proportionate approach adjusts the intensity of a check to the risk presented; it never permits omitting a check that law or a financing agreement makes mandatory, regardless of the transaction's size or apparent risk.

4.2.2 Counterparty Due Diligence and Sanctions Screening

Table 41: Counterparty Due Diligence and Sanctions Screening

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Screens a new counterparty, whether a supplier, consultant, contractor, grant recipient, implementing entity, project sponsor, key personnel or beneficial owner, against current sanctions lists (including the UN Security Council Consolidated List and applicable national/contractual lists) before engagement, selection or contract signature, not merely before the first payment.	Before engagement, selection or contract signature	Sanctions screening record
2	Finance Manager	Re-screens an existing counterparty at a minimum annual frequency, or immediately on any adverse information coming to GAMWORKS' attention.	Annually, or immediately on adverse information	Updated screening record
3	Finance and Administration Director	Reviews any screening match or adverse finding before any payment proceeds.	Before engagement, selection, contract signature or payment release, whichever is first	Documented clearance or escalation

SEE ANNEX *Form C34: Counterparty Due Diligence Checklist; Form C35: Beneficial Ownership and PEP Screening Record*

Complete the forms at Annex C: Standard Forms (Form C34, Form C35), which set out the required fields, signatures and approvals for this procedure.

Decline or termination of a counterparty relationship is required where: a sanctions match is confirmed; beneficial ownership cannot be established despite reasonable efforts and the Director General does not authorise proceeding (Section 4.2.3); or the due diligence outcome otherwise indicates a risk GAMWORKS cannot manage.

4.2.3 Beneficial Ownership Verification and Politically Exposed Persons

Sanctions screening alone does not identify who ultimately owns or controls a counterparty, or whether that counterparty is connected to a Politically Exposed Person (PEP), a role that carries a higher inherent risk of corruption or undue influence regardless of whether the counterparty itself appears on a sanctions list. GAMWORKS obtains beneficial ownership information for any counterparty above a threshold set by the Finance and Administration Director, and screens for PEP status as part of the same due diligence exercise.

Table 41a: Beneficial Ownership and PEP Screening

Trigger	Required Action
Any new counterparty above the Finance and Administration Director's threshold	Obtain beneficial ownership declaration and screen the named individuals for PEP status
Counterparty identified as, or connected to, a PEP	Finance and Administration Director's enhanced review before any payment; Director General informed
Beneficial ownership cannot be established despite reasonable efforts	Finance and Administration Director determines whether to proceed, decline, or seek Director General input; the transaction does not default to proceeding

4.2.4 Suspicious Transaction Identification and Reporting

INTEGRITY & AML ALERT *Red Flags*

Indicators that warrant closer review include a counterparty structuring payments to fall just under an approval threshold, a request for payment to an account in a name that does not match the counterparty, or a transaction with no clear commercial or project rationale. Any Finance or

Admin staff member identifying such an indicator raises it with the Finance and Administration Director immediately, rather than proceeding with the transaction pending clarification.

Table 42: Suspicious Transaction Reporting

Step	Responsible	Action	Timeline	Output / Deliverable
1	Any Staff Member	Identifies a suspicious indicator and raises it with the Finance and Administration Director.	Immediately, before the transaction proceeds	Internal suspicious activity note
2	Finance and Administration Director	Reviews the note and determines whether to pause the transaction and escalate.	Within 1 working day	Determination; transaction paused where warranted
3	Director General	Applies the mandatory reporting test at Section 4.2.4.1: where the test is met, submits the report to the Gambia Financial Intelligence Unit within the statutory deadline; where the Director General is implicated, the Finance and Administration Director applies the test and reports instead.	Within 2 working days of escalation	External report, where required

4.2.4.1 Mandatory Reporting Test and Confidentiality

A report to the Gambia Financial Intelligence Unit is mandatory, not discretionary, where GAMWORKS knows, suspects, or has reasonable grounds to suspect that funds are the proceeds of a predicate offence or are linked to terrorist financing; the Director General does not weigh commercial or reputational considerations against this test. This reflects legal advice on the applicable reporting threshold under the Act cited at Section 4.2.1.

INTEGRITY & AML ALERT *Confidentiality and No Tipping Off*

The fact that a suspicious activity note has been raised, escalated, or reported is shared only with those who need to know to progress it; the counterparty concerned is never informed, directly or indirectly, that it is or may be the subject of a report.

Records supporting the report are retained per Section 4.2.5 and protected from routine disposal.

Internal escalation (Table 42), a regulatory suspicious transaction report, a whistleblower report (Section 4.3.2), and notification to a development partner under the terms of a financing agreement are four distinct tracks; a matter may trigger more than one, and satisfying one does not discharge the others.

4.2.5 AML/CFT Record Keeping and Due Diligence Documentation

Sanctions screening records, beneficial ownership and PEP screening results, and any suspicious transaction note are retained for the same minimum period as financial records at Section 3.4.1, and are never disposed of while any related matter remains open, per the legal hold principle at Section 3.4.3.

SECTION 4.2: KEY POINTS

GAMWORKS applies a risk-based, not uniform, approach to screening counterparties against sanctions lists, before first payment and at least annually thereafter.

A screening match or adverse finding requires the Finance and Administration Director's clearance before any payment proceeds.

Beneficial ownership is obtained and PEP status screened for counterparties above a set threshold; a PEP connection triggers enhanced review, not automatic decline.

Any staff member identifying a suspicious transaction indicator pauses and escalates immediately rather than proceeding pending clarification.

AML/CFT records, including due diligence and screening results, follow the same retention and legal hold rules as financial records generally (Section 3.4).

4.3 Integrity and Whistleblower Protection Framework

This section covers GAMWORKS' internal, staff-facing grievance mechanism, whistleblower protection, and how integrity reports are investigated and escalated to the Board Audit Committee.

4.3.1 Internal Staff Grievance Mechanism

MANUAL BOUNDARY *Internal Grievance, Not Project-Level GRM*

This Subsection governs a staff member's grievance about their own employment, treatment, or a colleague's conduct. It is entirely separate from the project or community-facing Grievance Redress Mechanism under the institutional Environmental and Social Management System, which remains governed by the Technical Manual of Procedures. A grievance from a member of the public or a project beneficiary is never routed through this Subsection.



A staff member raises a grievance with their direct supervisor in the first instance; where the grievance concerns that supervisor, or is not resolved informally, it is raised with the Admin Manager, and, for a grievance concerning the Admin Manager or a Director, directly with the Director General.

4.3.2 Whistleblower Protection Principles and Reporting Channels

A whistleblower report differs from a grievance in that it concerns suspected fraud, corruption, AML/CFT violation, SEAH, or other integrity breach, rather than a personal employment grievance, and it may be made anonymously. GAMWORKS provides a reporting channel independent of the normal management chain, so that a report about the Director General or a Director can be made without going through that person.

INTEGRITY & AML ALERT *Independent Reporting Channel*

Whistleblower reports are made directly to the Internal Auditor, who reports functionally to the Board Audit Committee (Section 1.2.5), or, where the report concerns the Internal Auditor, directly to the Audit Committee Chair. No whistleblower report is routed through the Director General as a mandatory first step, so that a report implicating senior management cannot be filtered before it reaches independent oversight.

SEE ANNEX *Form C37: Whistleblower Report Intake Form*

Complete the form at Annex C: Standard Forms (Form C37), which sets out the required fields, signatures and approvals for this procedure.

4.3.2.1 Public and External Access to Reporting Channels

These reporting channels are named and published, not held internally only: a dedicated email address, a web form, a postal address, and a telephone or in-person option, each with current contact details maintained by the Internal Auditor. The channels are open to contractors, implementing entities, beneficiaries and any other external person, not only staff, and are published in the same accessible formats and languages as the Code of Conduct training at Section 3.3.5.

INTEGRITY & AML ALERT *Routes for Senior-Level Concerns*

A report is made directly to the Audit Committee Chair where it concerns the Internal Auditor, and directly to the Board Chair where it concerns the Audit Committee Chair or another member of Board leadership, so no report is filtered through the person it concerns.

A reporter, whether identified or anonymous, receives acknowledgement of receipt within 3 working days and, where they have provided a means of contact, periodic status updates until the matter closes, within the confidentiality limits at Section 4.3.3.

4.3.3 Investigation Procedures

Table 43: Whistleblower Report Handling



Step	Responsible	Action	Timeline	Output / Deliverable
1	Internal Auditor	Logs the report and conducts an initial risk assessment.	Within 3 working days of receipt	Whistleblower Report Intake Form
2	Internal Auditor	Investigates, applying the Investigation Terms of Reference (Section 4.3.3.1), or engages an independent or external investigator where the report concerns senior management, the Internal Auditor's own conduct, or exceeds GAMWORKS' internal capacity or independence.	Risk-based service standard (Section 4.3.3.1), reported to the Audit Committee	Investigation findings
3	Audit Committee	Reviews findings and directs referral to the disciplinary process (Section 4.1.5), law enforcement, or closure.	At the next scheduled meeting, or sooner for urgent matters	Audit Committee decision

Every investigation is a documented case, not an informal inquiry: it opens with a case file, preserves evidence so its origin and handling can be accounted for, and closes with a recorded outcome, so the same standard of rigour applies whether the matter is resolved quickly or takes months to conclude.

Table 43a: Case Management and Evidence Handling

Stage	Requirement
Case opening	A unique case reference is assigned on logging; the case file is held under the same security standard as personnel records (Section 3.1.4)
Evidence handling	Original documents and electronic evidence are preserved unaltered; the Internal Auditor records who collected each item, when, and from where (chain of custody)
Interim measures	Where the matter concerns an active risk (for example, ongoing access to funds or vulnerable individuals), the Internal Auditor recommends interim measures to the Director General pending the investigation's outcome, rather than waiting for closure to act
Case closure	Closure requires the Audit Committee's decision (Table 43) and a closure summary recording the outcome and any measures taken; a case is not closed by the passage of time alone

4.3.3.1 Investigation Terms of Reference and Service Standards

GAMWORKS adopts and publishes an Investigation Terms of Reference and case-processing guideline, approved by the Audit Committee, covering: the Internal Auditor's investigative mandate and jurisdiction over Prohibited Practices allegations; functional independence; appointment and removal; competence requirements; resourcing; access powers; intake and triage; conflict handling; evidence standards; confidentiality; witness protection; due process; the standard of proof applied; review of findings; referral routes; records; and reporting.

Case Severity	Target Timeline (Intake to Initial Determination)
Low (isolated, limited exposure)	20 working days
Medium (repeated pattern, moderate exposure, or SEAH)	30 working days
High (senior management, AML/CFT, or significant financial exposure)	45 working days, with interim measures considered from intake (Table 43a)

A target timeline is extended only with the Audit Committee's knowledge and a documented reason; it is not extended silently. An external independent investigator is engaged where the matter concerns senior management or the Internal Auditor's own conduct, where the required expertise (for example, forensic accounting) is not available internally, or where the caseload exceeds the Internal Auditor's capacity to meet the standards above.

4.3.3.2 Case-Trend Reporting

Separately from individual case files, the Internal Auditor prepares a periodic anonymised case-trend report for the Audit Committee, senior management, and relevant functions: volumes by category, root causes, control lessons, case ageing, and corrective actions taken as a result, without identifying any reporter, witness or subject.

INTEGRITY & AML ALERT *Aggregate Trends, Never Case Detail*

This case-trend report, not the individual case files, is what feeds the Corrective Action Tracker (Annex D) and the Consolidated Annual Report (Section 5.2.6); substantiated cases are never combined with general audit findings in a way that could expose confidential reporter or witness information.

Criteria for reopening a closed case, appeal or review of a finding, and secure access to case files, are set out in the Investigation Terms of Reference (Section 4.3.3.1). Notification of outcomes to the original reporter is made within the lawful and confidentiality limits at Section 4.3.3.

4.3.4 Protection Against Retaliation

INTERNAL CONTROL CHECKPOINT *No Retaliation*

No staff member, consultant, contractor, beneficiary, witness, or relative or associate of any of them is disciplined, demoted, denied a benefit, threatened, or otherwise disadvantaged for raising, or cooperating in good faith with the handling of, a grievance or whistleblower report, whether or not it is ultimately substantiated. Retaliation is defined broadly: any adverse action, direct or indirect, taken because of the report or cooperation, not only formal disciplinary action. A finding that retaliation has occurred is itself treated as gross misconduct under Table 40, regardless of the seniority of the person responsible, and, for a non-staff reporter, as a ground for the remedies at Section 4.1.5's parallel tracks.

REFERENCE STANDARD *Retaliation Protection Mechanics*

A confidential risk assessment is completed at intake (Table 43a) to identify whether interim protective measures are warranted before the substantive investigation concludes.

A person who believes they have suffered retaliation has an independent complaint and appeal route through the Audit Committee, separate from the original case.

Remedies include restoration (reinstatement, reversal of the adverse action) where applicable, in addition to the sanctions against the person responsible.

Retaliation complaints and their outcomes are monitored for pattern and recorded under the same standard as Table 43a.

4.3.5 Interface with Internal Audit and the Board Audit Committee

The Internal Auditor's independent reporting line to the Board Audit Committee, established at Section 1.2.5, is the same line through which whistleblower reports, conflict of interest registers (Section 4.1.2), and disciplinary matters escalated under Table 40 all reach independent oversight. The Corrective Action Tracker at Annex D consolidates outstanding matters from all three sources for the Audit Committee's ongoing review.

SECTION 4.3: KEY POINTS

The internal staff grievance mechanism is entirely separate from the project/community-facing GRM under the Technical Manual of Procedures.

Whistleblower reports go directly to the Internal Auditor, or to the Audit Committee Chair where the Internal Auditor is implicated, never mandatorily through the Director General.

Retaliation against a good faith reporter is itself gross misconduct, regardless of whether the underlying report is substantiated.

Whistleblower reports, conflict of interest declarations, and escalated disciplinary matters all reach the Audit Committee through the same independent line, consolidated in the Corrective Action Tracker (Annex D).





GAMWORKS

GAMBIAN AGENCY FOR THE MANAGEMENT
OF PUBLIC WORKS

PART

V

SYSTEMS & OVERSIGHT



PART V: SYSTEMS AND OVERSIGHT

This Part covers the IT systems supporting GAMWORKS' financial and administrative operations, and the interface between the Finance and Administration Department and Internal Audit and Board oversight, including the Consolidated Annual Report.

5.1 IT Systems and Financial Software

This section covers the financial software GAMWORKS relies on, user access controls, data backup and continuity, digital payment channel controls, and IT change management.

REFERENCE STANDARD *Benchmarks for this Section*

ISO 27001, as a benchmark for information security management practice.

COSO's Internal Control Integrated Framework, for the technology control environment generally.

5.1.1 Financial Software and System of Record

The IT Officer reports to the Finance and Administration Director, who is accountable for IT management and controls; the IT Officer is responsible for day to day system administration, user access, backups and technical support. This Part, together with Section 5.4 (business continuity, cybersecurity and data protection), constitutes GAMWORKS' IT and Digital Policy, covering IT governance and roles, the financial system, user access, backups, digital payment channels, change management, acceptable use, cybersecurity, data protection and digital records. GAMWORKS' accounting software, referred to throughout Part II as the source of both financial and management accounting (Section 2.2.3), is the single system of record for the Chart of Accounts (Section 2.1.2), the general and subsidiary ledgers, and payroll processing (Section 3.2.6). No parallel spreadsheet or manual ledger substitutes for the system of record for any purpose this Manual assigns to it; a spreadsheet may support analysis, but the system of record is authoritative wherever the two disagree.

5.1.2 User Access Controls and Segregation of Duties in the System

System access rights mirror the segregation of duties set out at Section 2.4.I: a user's system role permits only the initiation, review, or approval functions consistent with their position, and no user holds system rights that would let them both initiate and approve the same transaction type.

Table 44: User Access Request and Revocation

Step	Responsible	Action	Timeline	Output / Deliverable
I	Finance and Administration Director	Approves a new user's system access role, matched	Before system access is granted	Approved access request

Step	Responsible	Action	Timeline	Output / Deliverable
		to their position and segregation of duties tier.		
2	Admin Manager	Notifies Finance of any staff exit or role change requiring access revocation or amendment.	On the staff member's last working day, or on role change	Access revocation/amendment notice
3	Finance and Administration Director	Reviews the full user access list against current staff and roles.	At least every 6 months	Access review report

SEE ANNEX *Form C40: User Access Request*

Complete the form at Annex C: Standard Forms (Form C40), which sets out the required fields, signatures and approvals for this procedure.

5.1.3 Data Backup and Business Continuity

Financial and personnel data is backed up on a schedule sufficient to reconstruct the system of record in the event of loss, with backups held separately from the primary system so that a single incident cannot destroy both. The Finance and Administration Director tests recovery from backup at least annually, rather than assuming the backup regime works without having verified it.

5.1.4 Digital Payment Channel Controls

Controls over the digital payment channels referred to at Section 2.3.6, including the requirement for a separate initiator and approver on every channel, are implemented as system-enforced controls wherever the software supports it, rather than relying on procedural discipline alone where a system control is available.

5.1.5 IT Change Management

Table 45: IT Change Request and Approval

Step	Responsible	Action	Timeline	Output / Deliverable
1	Requesting Staff Member	Submits a change request for the financial software or a related system.	As the need arises	IT change request

Step	Responsible	Action	Timeline	Output / Deliverable
2	Finance and Administration Director	Approves any change affecting financial reporting, access controls, or the Chart of Accounts.	Before the change is implemented	Approved change request
3	Finance Manager	Tests the change in a non-production environment where available, before implementing in the live system.	Before go-live	Test confirmation

SEE ANNEX *Form C41: IT Change Request*

Complete the form at Annex C: Standard Forms (Form C41), which sets out the required fields, signatures and approvals for this procedure.

5.1.6 Acceptable Use of IT Equipment, Email and Internet

GAMWORKS computers, mobile devices, email, internet and systems are provided for official business. Every user signs an acknowledgement of these rules when access is granted (Form C40), and the IT Officer reminds users of them at least once a year.

Area	Rule	Responsible
Accounts and passwords	Each user has a personal account; passwords are not shared, are changed at least every 90 days, and multi-factor authentication is used wherever the system allows	User; IT Officer
Official email	Official business is conducted only through GAMWORKS email accounts, not personal accounts	User
Software	Only licensed software approved by the IT Officer is installed	IT Officer
Data storage	Official data is stored on GAMWORKS systems or approved cloud storage, not on personal devices or personal cloud accounts	User; IT Officer
Removable media and personal devices	Used only with the IT Officer's approval, and scanned before use	User; IT Officer
Internet use	Reasonable and lawful use only; no access to illegal or offensive content	User

Area	Rule	Responsible
Equipment custody	IT equipment is assigned on Form C16 and returned on exit or transfer	Admin Manager; IT Officer
Incidents	Suspected viruses, phishing, lost devices or data breaches are reported to the IT Officer immediately (Section 5.4.3)	User

INTERNAL CONTROL CHECKPOINT *Exit and Role Change*

On a staff member's exit or change of role, the Admin Manager notifies the IT Officer the same day, and the IT Officer removes or changes access and recovers equipment before the final salary is paid.

SECTION 5.1: KEY POINTS

The accounting software is the single system of record; no parallel spreadsheet or manual ledger substitutes for it.

System access mirrors segregation of duties (Section 2.4.1); access is



Area	Rule	Responsible
reviewed at least every 6 months. Backups are tested for actual recovery at least annually, not assumed to work. Digital payment channel controls are system-enforced wherever the software allows, not left to procedure alone.		

5.2 Administrative and Financial Interface with Internal Audit

This section covers the operational detail of the Finance and Administration Department's interface with Internal Audit, the Board, and the Audit Committee, referred to throughout this Manual, and closes with the GAMWORKS Consolidated Annual Report.

5.2.1 Description of the Interface

The Internal Auditor's independence, and the Finance and Administration Department's role in supporting rather than directing audit work, are established at Section 1.2.5. This Subsection operationalises that relationship: what the Department provides to Internal Audit, on what notice, and how findings flow back.

REFERENCE STANDARD *Governing Instruments for Internal Audit*

Internal Audit operates under the Board/Audit Committee-approved Internal Audit Charter and annual Risk-Based Audit Plan, which this Manual's operational interface follows rather than restates.

Both instruments incorporate the IIA Global Internal Audit Standards or an equivalent recognised standard, unrestricted access to records, people and systems, functional reporting to the Audit Committee, and a Quality Assurance and Improvement Programme (QAIP) with periodic internal and external assessment.



5.2.2 Notice Periods and Documentation Requests

Table 46: Internal Audit Documentation Request Response

Step	Responsible	Action	Timeline	Output / Deliverable
1	Internal Auditor	Issues a documentation request to the Finance and Administration Department, specifying the records and the deadline.	As audit fieldwork requires	Documentation request
2	Finance and Administration Director	Ensures the requested records are provided complete and on time, escalating to the Director General only if a request cannot be met.	By the deadline stated in the request, minimum 5 working days	Records provided

5.2.3 Coordination on Payroll, Asset Registers and Institutional Procurement

Internal Audit's periodic review of payroll (Section 3.2.9), the Fixed Asset Register (Section 2.4.4), and institutional procurement (Section 3.1.2) draws on records the Finance and Administration Department and Admin Manager maintain in the ordinary course; this Subsection does not create a separate audit-specific record-keeping requirement beyond what those Sections already establish.

5.2.4 Corrective Action Tracking

The Corrective Action Tracker at Annex D, referred to throughout this Manual, is maintained by the Internal Auditor and consolidates findings from external audit (Section 2.1.4), internal audit, and conflict of interest declarations (Section 4.1.2), so the Audit Committee reviews one consolidated record rather than several separate logs. Whistleblower and investigation case files (Section 4.3.3) are never entered in Annex D at case level; only the anonymised, aggregated case-trend report at Section 4.3.3.2 feeds into this consolidated oversight picture, so confidential case detail is never in a document circulated as broadly as the Corrective Action Tracker.

5.2.5 Support to the Board Secretariat and Audit Committee

Board Secretariat support is provided by the Corporate Affairs Manager, and Audit Committee Secretariat support directly by the Internal Auditor, as established at Section 1.2.5. The Finance and Administration Department contributes financial and administrative reports for both bodies' consideration but does not hold Secretariat responsibility for either.

5.2.6 GAMWORKS Consolidated Annual Report

The reports at Sections 2.1.3 and 2.5.1 are each scoped to a single audience: the institutional financial statements to the Board and external auditor, and each project or DMC report to its own development partner or MDA. Neither, on its own, gives the Board a single agency-wide picture. This Subsection



sets out the Consolidated Annual Report, which brings institutional results and every active project's and DMC's results together in one document, for the Board and for GAMWORKS' own strategic reporting, consistent with this Section's broader role in Board-level oversight.

Table 47: Consolidated Annual Report Preparation

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance Manager	Compiles the institutional annual financial statements (Section 2.1) and every individual project/DMC report (Section 2.5.1) prepared for the year into a single consolidated draft.	Within 6 weeks of financial year end	Draft Consolidated Annual Report
2	Finance and Administration Director	Reviews the draft for consistency between the consolidated figures and each underlying project/DMC cost centre.	Within 10 working days	Reviewed draft
3	Director General	Adds Agency-wide narrative commentary, including strategic and capacity highlights, and certifies the report.	Within 10 working days	Certified Consolidated Annual Report
4	Board of Directors	Receives and considers the Consolidated Annual Report, ordinarily ahead of the Annual General Meeting.	At the Board meeting preceding the AGM	Board-considered Consolidated Annual Report

SEE ANNEX *Form C42: Consolidated Annual Report*

Complete the form at Annex C: Standard Forms (Form C42), which sets out the required fields, signatures and approvals for this procedure.

SECTION 5.2: KEY POINTS

Internal Audit's documentation requests are met complete and on time by the Finance and Administration Director, escalating to the Director General only where a request genuinely cannot be met.

The Corrective Action Tracker (Annex D) consolidates external audit, internal audit and conflict of interest findings into one record for the Audit Committee; whistleblower and investigation

matters feed in only as the anonymised case-trend report (Section 4.3.3.2), never as case-level detail.

Board and Audit Committee Secretariat support sits with the Corporate Affairs Manager and Internal Auditor respectively, not Finance and Administration.

The Consolidated Annual Report brings institutional and every project/DMC result together for the Board, ahead of the AGM, rather than leaving the Board to assemble the picture from separate reports.

5.3 Institutional Risk Management

This section establishes enterprise-wide risk management as a distinct discipline from the individual controls set out elsewhere in this Manual: those controls address specific, known risks (a payment error, an unreconciled account), while this Section ensures GAMWORKS also identifies and tracks risks that cut across Departments or have not yet materialised as a specific control failure.

REFERENCE STANDARD *Benchmarks for this Section*

COSO Enterprise Risk Management Integrated Framework, as the benchmark for this Section's structure.

ISO 31000, as a benchmark for risk assessment methodology.

5.3.1 Risk Management Responsibilities

The Director General owns institutional risk management overall, delegated operationally to the Finance and Administration Director for fiduciary and financial risk and to the Technical Director for project and DMC delivery risk. Every Director is responsible for identifying risks within their own Department; risk management is not a Finance and Administration function performed on other Departments' behalf.

The Internal Auditor independently reviews and may challenge the Finance and Administration Director's own fiduciary risk ratings, applying Section 1.2.6, so that the Director's dual role in owning and consolidating fiduciary risk is subject to a check outside that same reporting line.

5.3.2 Risk Identification and Assessment

Table 48: Risk Identification and Assessment

Step	Responsible	Action	Timeline	Output / Deliverable
I	Every Director	Identifies risks within their Department, including financial,	Ongoing, with a formal review at Table 49's frequency	Departmental risk inputs

Step	Responsible	Action	Timeline	Output / Deliverable
		operational, compliance and strategic risks.		
2	Finance and Administration Director	Consolidates Departmental inputs and assesses each risk's likelihood and impact.	At each formal review	Assessed risk entries
3	Director General	Reviews the consolidated assessment and confirms the institution's most significant risks.	At each formal review	Confirmed top risks

5.3.3 Corporate Risk Register

The consolidated output of Subsection 5.3.2 is maintained as GAMWORKS' Corporate Risk Register, at Annex F, rather than as a series of separate Departmental lists. The Register is a living document: a risk is added, re-rated, or closed as circumstances change, not rewritten from scratch at each review.

SEE ANNEX *Form C43: Corporate Risk Register Entry*

Complete the form at Annex C: Standard Forms (Form C43), which sets out the required fields, signatures and approvals for this procedure.

5.3.4 Risk Escalation and Reporting

INTERNAL CONTROL CHECKPOINT *Significant Risks Reach the Board*

A risk rated as significant by the Director General, or any risk a Director believes is significant regardless of the Director General's rating, is reported to the Board at the next scheduled meeting, and immediately where the risk is urgent. A significant risk is never held at management level awaiting the next routine cycle.

5.3.5 Periodic Risk Review

Table 49: Risk Review Frequency

Risk Category	Review Frequency	Reviewed By
Fiduciary and financial risk	Quarterly	Finance and Administration Director, reported to the Director General

Risk Category	Review Frequency	Reviewed By
Project and DMC delivery risk	Quarterly	Technical Director, reported to the Director General
Full Corporate Risk Register	Annually, or on any significant change	Director General, reported to the Board

SECTION 5.3: KEY POINTS

Every Director owns risk identification for their own Department; the Director General owns institutional risk management overall.

Risks are consolidated into a single Corporate Risk Register (Annex F), not separate Departmental lists.

A significant risk is escalated to the Board immediately, never held awaiting the next routine review cycle.

Fiduciary and delivery risk are reviewed quarterly; the full Register is reviewed at least annually by the Board.

5.4 Business Continuity, Cybersecurity and Data Protection

This section covers how GAMWORKS continues critical functions through a disruption, protects its systems from cyber threats, and protects personal and confidential data.

REFERENCE STANDARD *Benchmarks for this Section*

ISO 22301 (Business Continuity Management), as a benchmark for continuity planning.

ISO 27001 and the Gambia Data Protection legal framework, for cybersecurity and data protection practice.

5.4.1 Business Continuity Planning

GAMWORKS maintains a Business Continuity Plan identifying its critical functions, the minimum resources needed to continue them through a disruption (loss of premises, key staff, or systems), and the sequence for restoring full operations. The Finance and Administration Director maintains the financial and administrative sections of the Plan; the Technical Director maintains the sections covering ongoing project and DMC obligations.

5.4.2 Disaster Recovery Arrangements

Disaster recovery, the technical restoration of IT systems and data specifically, is a component of the Business Continuity Plan rather than a separate exercise. The backup testing at Section 5.1.3 is the primary evidence that disaster recovery would work in practice.



5.4.3 Cybersecurity Responsibilities

Table 50: Cybersecurity Responsibilities

Responsibility	Owner
Access control and password policy enforcement	Finance and Administration Director
Security patching and antivirus/endpoint protection	Finance and Administration Director, or an engaged IT service provider
Incident detection and response	Finance and Administration Director, escalating to the Director General for any incident involving suspected data loss or financial system compromise
Staff awareness (phishing and safe use)	Admin Manager, as part of the annual training plan (Section 3.3.5)

INTEGRITY & AML ALERT *Cyber Incidents Are Reported, Not Handled Quietly*

A suspected cybersecurity incident, including a phishing attempt that succeeded, unauthorised access, or any sign of data loss, is reported to the Finance and Administration Director immediately by whoever discovers it, and is not resolved informally without a record, since a quietly fixed incident cannot inform whether the same vulnerability affects other systems.

5.4.4 Data Protection and Confidentiality

Personal data GAMWORKS holds on staff, contractors, and project beneficiaries is used only for the purpose it was collected for, and is not shared outside GAMWORKS without the Finance and Administration Director's authorisation, except where sharing is required by law or a development partner's financing agreement.

5.4.5 Digital Records Management and Retention

Digital records follow the same classification and retention rules as physical records at Section 3.4.1, held on the systems and under the backup regime at Sections 5.1.1 and 5.1.3; this Subsection does not create a separate digital retention schedule.

SECTION 5.4: KEY POINTS

The Business Continuity Plan identifies critical functions and minimum resources to continue them; disaster recovery is its IT-specific component.

Cybersecurity responsibilities are assigned by function (Table 50), not left undefined; incidents are reported immediately, never resolved quietly without a record.

Personal data is used only for its original purpose and not shared externally without Finance and Administration Director authorisation.

Digital records follow the same classification, retention and legal hold rules as physical records (Section 3.4).

5.5 Compliance Monitoring and Capacity Building

This section covers how GAMWORKS checks, on an ongoing basis, that this Manual is actually being followed, rather than relying on the Manual's existence alone.

5.5.1 Periodic Compliance Reviews

Table 51: Compliance Review Cycle

Step	Responsible	Action	Timeline	Output / Deliverable
1	Finance and Administration Director	Selects a sample of transactions and processes across Departments, using a defined scope and sampling methodology, and tests them against this Manual's requirements, rating each issue found.	Quarterly, in addition to the Risk-Based Audit Plan's scheduled audits	Compliance review findings
2	Finance and Administration Director	Reports findings and the management response to the Director General, escalates any unresolved gap, logs it in the Corrective Action Tracker (Annex D), and independently validates closure before a finding is marked closed.	Within 10 working days of the review	Corrective Action Tracker entries

This quarterly first-line testing is a management control, owned by the Finance and Administration Director, not by Internal Audit. Internal Audit's role is to independently assess, under its own risk-based audit plan, whether this compliance-testing framework is itself designed and operating effectively; Internal Audit does not perform the quarterly testing, and preserves its right to audit the framework without operating it.

INTERNAL CONTROL CHECKPOINT *Annual Management Control Self-Assessment*

In addition to the quarterly reviews, the Finance and Administration Director completes an annual management control self-assessment, confirming for each key control in this Manual whether it operated as designed for the year, with exceptions identified and a remediation owner named.

5.5.2 Annual Conflict of Interest Declarations

The annual declaration cycle established at Section 4.1.2 is coordinated by the Admin Manager and its completion rate reported to the Finance and Administration Director as part of this Section's compliance monitoring, so that a missing declaration is treated as a compliance gap rather than an administrative oversight.

5.5.3 Refresher Training on Ethics, Integrity and Fiduciary Responsibilities

Refresher training is coordinated through the annual training plan at Section 3.3.5, which already distinguishes mandatory compliance training from discretionary development; this Subsection does not create a separate training cycle, but confirms that ethics, integrity and fiduciary refresher training is itself mandatory compliance training for this purpose.

5.5.4 Monitoring Compliance with Policies and Procedures

The compliance review findings at Subsection 5.5.1, the annual declaration completion rate at Subsection 5.5.2, and mandatory training completion at Section 3.3.10 are consolidated by the Finance and Administration Director into a single compliance summary, reported to the Director General quarterly and to the Board annually alongside the Consolidated Annual Report (Section 5.2.6).

SECTION 5.5: KEY POINTS

Compliance is checked actively through quarterly sampling (Table 51), not assumed from the Manual's existence.

A missing annual conflict of interest declaration is treated as a compliance gap, tracked the same way as any other finding.

Ethics, integrity and fiduciary refresher training is mandatory compliance training under Section 3.3, not a separate cycle.

Compliance findings, declarations, and training completion are consolidated into one summary reported to the Director General quarterly and the Board annually.

PART VI: SCOPE BOUNDARY WITH THE TECHNICAL MANUAL OF PROCEDURES

This Part confirms the boundary between this Manual and the Technical Manual of Procedures, so the two do not duplicate content.

6.1 Cross-References to the Technical Manual of Procedures

REFERENCE STANDARD *Benchmarks for the Technical Manual of Procedures*

FIDIC conditions of contract, World Bank Procurement Regulations for Investment Project Financing, and the Gambia Public Procurement Act 2022, as benchmarks for the Technical Manual of Procedures' own content, noted here for completeness rather than adopted by this Manual.

The Technical Manual of Procedures covers Project Cycle Management, project and DMC related procurement, institutional grant award and implementation, and the institutional ESMS, Gender Policy and GRM integration points. This Manual's own procurement content is limited to institutional procurement of office supplies, minor equipment and consumables (Section 3.1). The Technical Manual of Procedures covers, across its own Parts: project identification, design and appraisal, a project-at-risk system, project and DMC related procurement, institutional grant award (published eligibility, selection and award criteria, impartial evaluation, duplicate-funding and no-retroactivity checks, public disclosure, and recovery of unduly paid funds), the ESMS, Gender Policy, SEAH Prevention Policy and Indigenous Peoples considerations, and an independent Grievance Redress Mechanism.

Table 52: Boundary with the Technical Manual of Procedures

Subject	Governed By
6.1.1 Project Cycle Management	Technical Manual of Procedures, in full
6.1.2 Procurement	Institutional procurement: this Manual, Section 3.1. Project and DMC related procurement: Technical Manual of Procedures, regardless of value (Section 2.4.3)
6.1.3 Institutional Grant Award and Implementation	Technical Manual of Procedures, in full
6.1.4 Institutional ESMS, Gender Policy and GRM Integration Points	Technical Manual of Procedures, in full; distinct from the internal staff grievance mechanism at Section 4.3.1
6.1.5 Capacity Development and Competency Framework	This Manual, Section 3.3, for all staff, technical and administrative. The Technical Manual of Procedures refers to it and does not repeat it

SECTION 6.1: KEY POINTS

This Manual and the Technical Manual of Procedures do not duplicate content: Table 52 identifies which document governs each subject.

Institutional procurement (this Manual, Section 3.1) and project/DMC related procurement (Technical Manual of Procedures) are distinguished by funding source, not value, per Section 2.4.3.

The project/community-facing GRM under the ESMS (Technical Manual of Procedures) is distinct from GAMWORKS' internal staff grievance mechanism (Section 4.3.1).



ANNEXES

The Annexes to this Manual are issued as separate companion documents, so that they can be updated, printed and used without reissuing the Manual. Each is referred to in the text by its letter and, for forms, by its form number. Where an Annex sets a figure or threshold, it is set by the Director General and may be revised without a full revision of this Manual.

Table 53: List of Annexes

Annex	Title	Document
Annex A	Chart of Accounts	Annexes A to F
Annex B	Delegation of Authority Matrix	Annexes A to F
Annex C	Standard Forms (Forms C1 to C51 and D1)	Annex C: Standard Forms (separate volume)
Annex D	Corrective Action Tracker	Annexes A to F
Annex E	Scheme of Service and Job Descriptions	Annexes A to F
Annex F	Corporate Risk Register	Annexes A to F



G A M W O R K S

Finance and Administration Manual

October 2026

Updated with the support of UNIDO