

The Maisha Project Policy Manual

**The Maisha Project**

**Governance, Privacy, Safeguarding, and Compliance Policy Manual**

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**Document control**

<b>Document title:</b> Child Safeguarding and Protection Policy	
<b>Scope:</b> Board members, U.S. and Kenya staff, volunteers, mission team members, interns, contractors, consultants, visitors with program access, partners, and vendors where child contact or child data access is possible.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
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**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	New standalone 2026 policy framework developed for Maisha’s expanded operating model. No standalone or reference policy was identified for the 2015 governance baseline.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document control and integrated with Maisha governance, privacy, safeguarding, data, donor, and cross-border controls.	Jacob Breit, Director of Development

**1. Purpose**

The Maisha Project serves abandoned, orphaned, and vulnerable children in Kenya. Safeguarding is central to mission integrity, beneficiary dignity, donor trust, and grant eligibility. This policy establishes preventive standards, clear reporting pathways, and an accountable response system for any concern involving child safety, exploitation, abuse, neglect, grooming, trafficking risk, or boundary violations.

**2. Scope**

This policy applies to all settings and platforms where Maisha engages children or child-related information, including Maisha Academy, dormitories, clinic services, feeding programs, distributions, mission activities, transport, off-site events, home visits, digital environments, photographs, videos, e-learning, messaging, data storage, sponsorship records, and case documentation.

### 3. Definitions

Child means any person under 18. Safeguarding means prevention and culture-building to reduce risk of harm. Child protection means action taken when harm is suspected, disclosed, alleged, or observed. Abuse includes physical, sexual, emotional, or psychological abuse, exploitation, neglect, harmful practices, grooming, trafficking, forced labor, coercion, or any conduct that causes or risks harm to a child.

### 4. Governance and accountability

The Board has ultimate oversight of safeguarding and ensures adequate resources, independent reporting options, training, monitoring, and timely enforcement.

The Executive Director appoints a U.S. Safeguarding Lead with authority to receive reports, initiate response, secure documentation, and escalate to law enforcement or child protection authorities where required.

Kenya operations designate a Kenya Safeguarding Focal Point who coordinates local reporting, child protection referrals, facility-level controls, and coordination with relevant child protection structures.

Any report involving the Safeguarding Lead, Kenya Focal Point, Executive Director, Board Chair, Board member, senior staff member, donor, partner, or mission leader is escalated directly to a disinterested Board officer or the Board Governance Committee.

### 5. Mandatory reporting and reporting pathways

If a child is in immediate danger, the first action is safety. Seek urgent medical care, physical protection, and emergency support without delay.

If Maisha conducts activities involving children in Oklahoma, or if an Oklahoma-based Maisha representative receives information suggesting that a child in Oklahoma is a victim of abuse or neglect, reporting must be made promptly to the appropriate Oklahoma authority as required. Internal notification to Maisha is not a substitute for external reporting.

The Kenya Safeguarding Focal Point maintains a current list of reporting pathways and referral partners, including local child protection structures, law enforcement contacts, health referral points, school-based contacts, and the National Child Helpline 116 as a supplemental resource.

Retaliation against reporters, children, families, witnesses, staff, volunteers, or any person cooperating with a safeguarding review is prohibited.

### 6. Code of conduct

All covered persons must treat children with dignity, respect, cultural humility, and age-appropriate care; maintain appropriate physical, emotional, digital, and professional boundaries; never engage in sexual activity with a child or exploitative relationship with a beneficiary; never use corporal punishment, humiliation, intimidation, threats, coercion, degrading language, or discriminatory treatment; avoid being alone with a child in private; never provide alcohol, drugs, tobacco, weapons, sexual materials, or inappropriate digital content to a child; never exchange money, gifts, grades, sponsorship, food, employment, photos, transportation, or favors for access, companionship, labor, affection, silence, or preferential treatment; and comply with Maisha media rules.

### 7. Safer recruitment and screening

Screening requirements increase with child-contact intensity and child-data access. High-contact roles require identity verification, reference checks, role-specific vetting, safeguarding disclosure, and appropriate background checks consistent with the jurisdiction. Vendors, visiting teams, short-term contractors, donors, photographers, media personnel, and visitors receive safeguarding orientation and are supervised in child-access areas.

### 8. Training

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All covered persons must complete safeguarding training before program access and annual refresher training thereafter. Dormitory staff, teachers, clinic staff, social work roles, sponsorship personnel, media personnel, mission leaders, and program managers receive enhanced training.

### 9. Response and case management

Maisha shall secure child safety, medical care, and separation from the alleged perpetrator pending review; refer credible allegations to appropriate authorities as required; conduct timely internal fact-finding; document decisions; apply consequences; preserve dignity and confidentiality; prohibit retaliation; and take a survivor-centered approach.

### 10. Records and reporting

Safeguarding records are maintained securely with restricted access. Retention follows Maisha's retention rules and any applicable Kenya, Oklahoma, donor, grantor, or legal requirements.

The Safeguarding Lead provides quarterly reporting to the Board Governance Committee, including training completion, incidents, corrective action status, and risk trends, with immediate reporting for material incidents.

### Appendix A: Operating procedures

Immediate workflow: ensure safety and medical care; notify the Safeguarding Lead or Kenya Focal Point; determine jurisdiction and external reporting duties; make required reports; separate the alleged perpetrator from child contact pending review; create a restricted incident file; implement interim safeguards; complete internal review; and conduct a lessons-learned review.

Mission team safeguards: pre-departure orientation required. No unsupervised child contact. No private photography. No promises of gifts or sponsorship to beneficiaries. No private digital contact. All gifts, letters, photos, and sponsor communications must be coordinated through Maisha leadership.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Whistleblower, Anti-Retaliation, and Complaint Escalation Policy	Safeguarding case log
Child Data, Student Records, and Sponsorship Privacy Policy	Mission team safeguarding acknowledgement
Photography, Videography, Storytelling, and Media Consent Policy	Visitor access rules
Health and Clinical Privacy Policy	Kenya referral pathway list

**Conflict of Interest and Related Party Transactions Policy**

**Document control**

<b>Document title:</b> Conflict of Interest and Related Party Transactions Policy	
<b>Scope:</b> Board members, officers, key employees, committee members, staff, contractors, consultants, volunteers, mission leaders, vendors, partners, and any person with authority to influence Maisha decisions.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
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<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
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**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Maisha governance baseline identified in Governance Policies 091815.pdf and related Financial Operations 091815.pdf. Exact original author and approval fields were not identified in the available files.	Maisha legacy governance authors, not identified in source file
January 2026	2.0	Expanded 2026 policy development reflected in Intended 2026 Policies and related governance drafting for safeguarding, anti-corruption, data, environmental, and inclusion controls.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control, updated for Maisha U.S. and Kenya operations, and aligned with donor privacy, child safeguarding, cross-border data, mission teams, health programs, and governance oversight.	Jacob Breit, Director of Development

## 1. Purpose

The purpose of this policy is to protect Maisha’s charitable mission, tax-exempt status, fiduciary integrity, donor confidence, and organizational independence when Maisha is considering any transaction, arrangement, grant, contract, employment relationship, compensation decision, vendor relationship, procurement decision, sponsorship, partnership, or program arrangement that may benefit, or appear to benefit, the private interest of a covered person.

## 2. Scope

This policy applies to decisions involving contracts, vendors, employment, compensation, reimbursements, procurement, grants, donor arrangements, sponsorships, Kenya operations, mission activities, medical partnerships, construction, agriculture, education, solar, water, health, media, transportation, consulting, and use of Maisha assets.

## 3. Definitions

Covered person means any person with authority to influence a Maisha decision. Conflict of interest means any financial, familial, professional, fiduciary, donor-related, employment-related, personal, organizational, political, religious, or business interest that may impair, appear to impair, or compete with a person’s duty to act in Maisha’s best interest. Family member includes spouse, domestic partner, parent, child, sibling, grandparent, grandchild, in-law, step-relative, household member, or any person whose relationship could reasonably affect independent judgment.

## 4. Governance and accountability

The Board is responsible for enforcing this policy and ensuring that conflicted transactions are reviewed by disinterested persons.

The Board Governance Committee administers annual disclosures, reviews potential conflicts, and recommends corrective action.

The Finance Committee reviews financial conflicts, compensation conflicts, procurement conflicts, and related party transactions with material financial implications.

Any conflict involving the Executive Director, Board Chair, Treasurer, major donor, related vendor, or senior program leader must be escalated to disinterested Board leadership.

## 5. Operating requirements

Covered persons must disclose actual, potential, or perceived conflicts as soon as they become aware of them.

Directors, officers, key employees, and committee members with delegated authority must complete an annual conflict disclosure statement and update it when circumstances materially change.

After disclosure, the interested person may provide relevant information but must leave during deliberation and voting unless asked to answer specific factual questions.

Disinterested decision-makers must consider Maisha’s best interest, fairness, reasonableness, alternatives, private benefit risk, donor restrictions, reputational risk, and whether the transaction is arm’s length.

No person may participate in deliberation or voting concerning their own compensation or compensation for a family member or related entity.

Covered persons may not solicit or accept gifts, favors, travel, meals, entertainment, loans, commissions, referral fees, or benefits intended to influence Maisha decisions.

## 6. Records and retention

Conflict disclosures, minutes, recusals, votes, annual statements, and corrective actions are retained as governance records under Maisha’s retention policy.

## 7. Reporting and escalation

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The Board Governance Committee reports annually to the Board regarding annual disclosure completion, material conflicts reviewed, and corrective actions taken.

**Appendix A: Operating procedures**

Minimum workflow: disclose the interest; determine whether a conflict exists; recuse the interested person; evaluate alternatives; approve only if fair, reasonable, and in Maisha’s best interest; document all actions in minutes.

**Supporting policies and documents**

<b>Primary related policies</b>	<b>Operational documents and controls</b>
Whistleblower Policy	Annual conflict disclosure form
Financial Operations and Internal Controls Policy	Board minutes
Anti-Fraud Policy	Vendor selection records
Donor Privacy Policy	Compensation comparability records

**Whistleblower, Anti-Retaliation, and Complaint Escalation Policy**

**Document control**

<b>Document title:</b> Whistleblower, Anti-Retaliation, and Complaint Escalation Policy	
<b>Scope:</b> Board members, officers, staff, volunteers, mission team members, interns, contractors, consultants, vendors, partners, program participants, donors, and any person reporting a concern involving Maisha.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
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<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
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**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Maisha governance baseline identified in Governance Policies 091815.pdf and related Financial Operations 091815.pdf. Exact original author and approval fields were not identified in the available files.	Maisha legacy governance authors, not identified in source file
January 2026	2.0	Expanded 2026 policy development reflected in Intended 2026 Policies and related governance drafting for safeguarding, anti-corruption, data, environmental, and inclusion controls.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control, updated for Maisha U.S. and Kenya operations, and aligned with donor privacy, child safeguarding, cross-border data, mission teams, health programs, and governance oversight.	Jacob Breit, Director of Development

## 1. Purpose

The purpose of this policy is to encourage and protect good-faith reporting of suspected misconduct, legal violations, financial impropriety, safeguarding concerns, fraud, corruption, donor misrepresentation, data privacy violations, abuse of authority, retaliation, unsafe practices, waste, misuse of charitable assets, and other wrongful conduct involving Maisha.

## 2. Scope

This policy applies to all Maisha activities, including U.S. operations, Kenya operations, fundraising, donor stewardship, missions, grants, accounting, child safeguarding, clinical activities, education, agriculture, infrastructure, procurement, vendor relationships, and digital systems.

## 3. Definitions

Whistleblower report means a good-faith report of suspected misconduct, legal violation, policy violation, financial irregularity, safeguarding concern, privacy concern, or other wrongful conduct. Retaliation means any adverse action taken because a person reported a concern, participated in a review, refused to participate in misconduct, or contacted lawful authorities.

## 4. Governance and accountability

The Board ensures independent reporting channels, non-retaliation, and appropriate review.

The Board Governance Committee oversees reports involving governance, safeguarding, retaliation, conflicts, leadership, or policy violations.

The Finance Committee oversees reports involving financial misconduct, fraud, accounting, grants, donor funds, procurement, or restricted gifts.

A person who is the subject of a report may not control, supervise, obstruct, or materially influence the investigation.

## 5. Operating requirements

Reportable concerns include fraud, theft, embezzlement, false invoices, bribery, kickbacks, misuse of donor funds, false fundraising, donor reporting, child safeguarding failures, health privacy concerns, data breaches, harassment, discrimination, retaliation, destruction of records, sanctions concerns, and procurement concerns.

Reports may be made to the Executive Director, Board Chair, Finance Committee Chair, Board Governance Committee Chair, Safeguarding Lead, Privacy Lead, any Board officer, outside counsel if designated, or a dedicated reporting email.

Nothing in this policy prohibits lawful external reporting to law enforcement, child protection authorities, regulators, the IRS, the Oklahoma Secretary of State, Kenya authorities, grantors, auditors, or other appropriate authorities.

Maisha will treat reports as confidential to the extent reasonably possible. Absolute confidentiality cannot be guaranteed.

Retaliation is prohibited and may result in discipline, removal, termination, contract termination, volunteer removal, or other corrective action.

## 6. Records and retention

Whistleblower records are restricted records. Relevant documents must not be destroyed, altered, deleted, or concealed once a report, investigation, audit, litigation, or official inquiry is known or reasonably anticipated.

## 7. Reporting and escalation

Material reports involving fraud, child safety, donor funds, executive leadership, Board members, retaliation, legal risk, reputational risk, or privacy incidents must be escalated promptly to the Board or a disinterested Board committee.

## Appendix A: Operating procedures

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Minimum workflow: receive and document the report; assess immediate risk; preserve records; assign disinterested reviewers; engage counsel or authorities where appropriate; review documents and witnesses; document findings; implement corrective actions.

**Supporting policies and documents**

<b>Primary related policies</b>	<b>Operational documents and controls</b>
Conflict of Interest Policy	Dedicated reporting inbox
Safeguarding Policy	Restricted investigation file
Data Breach Policy	Board escalation record
Litigation Hold Policy	Corrective action log

**Document control**

<b>Document title:</b> Donor Privacy, Confidentiality, Gift Stewardship, and Public Disclosure Policy	
<b>Scope:</b> Donors, sponsors, prospective donors, foundations, corporate partners, church partners, event attendees, grantors, in-kind donors, Board members, staff, volunteers, vendors, and any person with access to donor information.	
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<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
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**Version control**

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September 2015	1.0	Legacy Financial Operations Manual identified in Financial Operations 091815.pdf, including separation of duties, cash controls, gifts, acknowledgments, and donation management. Exact original author and approval fields were not identified in the available file.	Maisha legacy financial operations authors, not identified in source file
January 2026	2.0	Expanded 2026 operational policy development reflected in Intended 2026 Policies and current governance drafting.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control and updated for donor privacy, payment security, cross-border operations, anti-fraud, and board oversight.	Jacob Breit, Director of Development

**1. Purpose**

## The Maisha Project Policy Manual

The purpose of this policy is to protect donor trust, donor confidentiality, responsible gift stewardship, tax compliance, public accountability, and ethical fundraising. Maisha recognizes that donor information is confidential and must be handled with respect, accuracy, discretion, and appropriate safeguards.

### 2. Scope

This policy applies to donor information collected through online donations, checks, wire transfers, ACH transfers, recurring gifts, sponsorships, events, major donor meetings, grant applications, corporate partnerships, church partnerships, in-kind gifts, matching gifts, planned giving discussions, and fundraising campaigns.

### 3. Definitions

Donor information means any information identifying or relating to a donor, prospective donor, sponsor, grantor, or supporter. Restricted donor information includes donor financial information, payment data, bank information, giving history, private donor notes, anonymous giving preferences, planned gift discussions, and confidential relationship information.

### 4. Governance and accountability

The Development Department is responsible for donor stewardship and donor communication controls.

The Finance Committee oversees donor receipting, restricted gift administration, public disclosure controls, and financial record integrity.

The Privacy Lead supports donor data privacy and breach response.

The Executive Director ensures donor privacy expectations are implemented across staff, vendors, Board members, and volunteers.

### 5. Operating requirements

Maisha may collect donor names, addresses, email addresses, phone numbers, giving history, donation method, campaign designation, sponsorship preference, recognition preference, communication preference, employer matching information, event attendance, donor notes, grant information, in-kind gift documentation, and receipting records.

Maisha shall not sell, rent, trade, exchange, or provide donor names, donor contact information, donor lists, donor giving histories, donor notes, or donor profiles to third parties for their independent fundraising, marketing, commercial, political, or unrelated purposes.

Maisha may disclose donor information to authorized service providers when reasonably necessary, including payment processors, donor platforms, email providers, website hosts, event platforms, accounting providers, auditors, mailing vendors, CRM providers, legal counsel, cybersecurity providers, and operational vendors.

Maisha shall honor reasonable donor requests for anonymity. Anonymous giving does not prevent Maisha from retaining donor information internally for receipting, accounting, audit, fraud prevention, restricted gift compliance, legal compliance, stewardship, and Board oversight.

Maisha shall protect contributor names and addresses reported on Schedule B or similar donor schedules to the extent permitted by law.

Sponsors shall receive appropriate updates through approved channels and shall not receive a child's private contact information, home address, school ID, medical details, family trauma history, safeguarding records, or other restricted child information.

### 6. Records and retention

Donor records are retained according to Maisha's retention policy for tax, accounting, audit, legal, gift substantiation, donor stewardship, restricted gift administration, campaign management, historical, and organizational purposes.

### 7. Reporting and escalation

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The Development Department and Finance Committee report material donor privacy issues, restricted gift concerns, and public disclosure risks to the Executive Director and Board as appropriate.

**Appendix A: Operating procedures**

Before releasing public records, review for donor-identifying information, Schedule B contributor names and addresses, Social Security numbers, bank information, signatures, private donor notes, child data, patient data, safeguarding data, and confidential contracts.

**Supporting policies and documents**

Primary related policies	Operational documents and controls
Website Privacy Policy	Donor recognition preference form
Communications Privacy Policy	Gift acknowledgment process
Child Sponsorship Privacy Policy	Schedule B redaction review
Public Access to Records Policy	CRM access controls

**Document control**

<b>Document title:</b> Public Website Privacy Policy	
<b>Scope:</b> Website visitors, online donors, event registrants, newsletter subscribers, volunteers, prospective donors, sponsors, and digital users.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
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**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy explains how Maisha collects, uses, discloses, protects, and retains personal information obtained through Maisha-controlled websites, donation pages, event pages, online forms, newsletter tools, and related digital services.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to Maisha websites, landing pages, embedded forms, online donation tools, event registration forms, newsletter subscription tools, and related digital services controlled by Maisha.

### 3. Definitions

Personal information includes any information that identifies, relates to, describes, or could reasonably be linked to an individual.

### 4. Governance and accountability

The Privacy Lead owns website privacy governance.

The Development Department manages digital fundraising and communication workflows.

Vendors supporting the website, analytics, email, donation processing, and hosting must be reviewed under Maisha's vendor and data protection policies.

### 5. Operating requirements

Maisha may collect names, email addresses, mailing addresses, phone numbers, donation information, event registration information, volunteer inquiries, sponsorship inquiries, newsletter preferences, message content, IP address, browser type, device information, pages visited, referral source, approximate location derived from digital identifiers, cookie data, analytics data, and email engagement data.

Maisha may use information to process donations, issue receipts, respond to inquiries, send newsletters, administer events, coordinate volunteers, manage donor relationships, improve website function, analyze engagement, prevent fraud, maintain security, comply with law, and advance Maisha's charitable mission.

Maisha may use cookies, analytics tools, pixels, embedded media, and email tracking tools. Where required, Maisha will provide appropriate notice, consent, or opt-out mechanisms.

Maisha does not knowingly solicit personal information online directly from children under 13 in the United States without verifiable parental consent.

Personal information submitted online may be processed in the United States or by authorized service providers in other jurisdictions.

### 6. Records and retention

Maisha retains online information as long as reasonably necessary for the purpose collected and for legal, accounting, donor, audit, security, and operational requirements.

### 7. Reporting and escalation

Individuals may request updates, corrections, deletion where available, communication preference changes, donor anonymity, or information about Maisha's privacy practices by contacting Maisha's designated privacy email.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Donor Privacy Policy	Website privacy notice
Communications Privacy Policy	Cookie notice
Vendor Policy	Donation platform terms
Data Breach Policy	Analytics review

**Document control**

<b>Document title:</b> Communications, Email, SMS, and Marketing Privacy Policy	
<b>Scope:</b> Donors, sponsors, volunteers, event attendees, newsletter subscribers, website users, mission participants, partners, and staff using communication platforms.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
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<b>Source reference / superseded version:</b> No standalone or reference policy identified.	<b>Date of next review:</b> January 2028

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Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy governs Maisha’s use of email, SMS, phone, mail, newsletters, event communications, fundraising appeals, donor updates, sponsorship communications, volunteer communications, and mission communications.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to communications sent to donors, sponsors, volunteers, event attendees, website visitors, mission participants, Board members, staff, partners, prospective supporters, and other contacts.

### 3. Definitions

Marketing communication means any message primarily intended to solicit support, promote an event, provide campaign updates, or cultivate donors. Administrative communication includes donation receipts, mission logistics, safety messages, and operational notices.

### 4. Governance and accountability

The Development Department manages fundraising and donor communications.

The Privacy Lead supports communication preferences, opt-outs, and data minimization.

Program leaders manage operational communications with beneficiaries and participants.

All communication tools must be reviewed for appropriate data security and access controls.

### 5. Operating requirements

Maisha may communicate for donation receipting, donor stewardship, fundraising, event invitations, sponsorship updates, newsletters, program updates, volunteer coordination, mission travel, emergency notices, surveys, administrative notices, and relationship management.

Fundraising and marketing emails shall identify Maisha, use accurate sender information, avoid deceptive subject lines, include required contact information where applicable, and provide a functioning unsubscribe mechanism.

SMS and telephone communications shall be used only where consent has been provided, where operationally necessary, or where otherwise permitted by applicable law.

Maisha shall not add children, patients, Kenya-based beneficiaries, or program participants to donor marketing lists unless there is a legitimate, consented, and non-exploitative reason.

Individuals may unsubscribe, request reduced contact, update contact information, or modify communication preferences.

### 6. Records and retention

Communication records, preferences, opt-outs, and campaign records shall be retained according to Maisha's retention policy.

### 7. Reporting and escalation

Material complaints, unsubscribe failures, accidental list disclosures, or communication platform incidents must be escalated to the Privacy Lead and Development Department.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Donor Privacy Policy	Email platform access list
Website Privacy Policy	SMS consent records
Data Protection Policy	Opt-out log
Data Breach Policy	Campaign approval workflow

**Document control**

<b>Document title:</b> Child Data, Student Records, and Sponsorship Privacy Policy	
<b>Scope:</b> Children, students, parents, guardians, caregivers, sponsors, schools, staff, volunteers, mission teams, and program partners.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
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<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
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January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

Maisha is committed to protecting the privacy, dignity, safety, and best interests of children. This policy governs the collection, use, sharing, publication, retention, and protection of child data, student records, sponsorship information, child images, child stories, and family information.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to Maisha Academy, partner schools, feeding programs, sponsorship programs, education activities, health-related child data, missions, media activities, donor reporting, grant reporting, and all programs involving children.

### 3. Definitions

Child data includes any information identifying or relating to a person under 18. Sponsorship data means child and family information used for donor stewardship or sponsor communication.

### 4. Governance and accountability

The Safeguarding Committee protects child safety and child dignity.

The Privacy Lead supports data minimization, access controls, and privacy requests.

Program leaders ensure child data practices are implemented in schools, feeding programs, sponsorship, health, and missions.

The Development Department ensures sponsorship communications follow approved processes.

### 5. Operating requirements

Maisha may collect a child's name, preferred name, age, date of birth, gender, school, grade level, attendance, academic progress, sponsorship status, guardian information, emergency contacts, photographs, videos, health needs, dietary needs, disability accommodations, household circumstances, meal participation, and program participation.

Parent or guardian consent is required before collecting, publishing, or sharing identifiable child information unless emergency medical care, child protection, legal compliance, or vital interests require otherwise.

Refusal to provide media consent shall not be used to deny education, meals, health services, sponsorship eligibility, protection, or other core services.

Sponsors may receive approved child profiles, general updates, first name or approved preferred name, approximate age or grade, general program context, approved photographs, and non-sensitive progress updates.

Sponsors shall not receive a child's precise home address, phone number, personal email, school ID, medical diagnosis, safeguarding records, family trauma, abuse history, HIV status, disability details, or other restricted information unless approved for a compelling and documented purpose.

Maisha shall not permit direct, private, unsupervised, or unmonitored communication between sponsors, donors, visitors, mission travelers, volunteers, and children through personal channels.

### 6. Records and retention

Child data shall be retained only as long as necessary for education, sponsorship, safeguarding, health, audit, legal, donor, grant, archival, or operational purposes.

### 7. Reporting and escalation

Suspected misuse, disclosure, or unauthorized publication of child data must be escalated immediately to the Safeguarding Lead and Privacy Lead.

### Appendix A: Operating procedures

Before implementing any sponsorship platform, child database, school database, AI tool, biometric tool, or online child-facing service, Maisha shall conduct a privacy and safeguarding review.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Child Safeguarding Policy	Child media consent form

## The Maisha Project Policy Manual

Media Consent Policy	Sponsor communication workflow
Donor Privacy Policy	Restricted child data access list
Data Breach Policy	School record controls

**Document control**

<b>Document title:</b> Photography, Videography, Storytelling, and Media Consent Policy	
<b>Scope:</b> Staff, volunteers, mission travelers, donors, sponsors, visitors, contractors, photographers, videographers, consultants, journalists, Board members, and partners.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior media policy identified. Source reference: Intended 2026 Policies, Child Safeguarding and Protection Policy.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

Maisha uses photography, video, audio, interviews, written stories, social media, newsletters, impact reports, grant reports, and campaign materials to communicate its mission. This policy ensures that all media and storytelling practices protect dignity, privacy, consent, accuracy, and safety.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to all media created, collected, stored, published, or distributed in connection with Maisha programs, events, missions, schools, clinics, farms, community activities, donor reports, and public communications.

### 3. Definitions

Covered media includes photographs, videos, audio recordings, livestreams, interviews, written stories, testimonials, quotes, campaign materials, website stories, newsletters, donor updates, grant reports, impact reports, documentary footage, event recordings, and presentations.

### 4. Governance and accountability

The Development Department and Communications Lead manage public communications.

The Safeguarding Lead reviews child media and sensitive contexts.

The Privacy Lead supports consent records, removal requests, and data security.

Mission leaders and program managers enforce visitor and volunteer media restrictions.

### 5. Operating requirements

Maisha shall obtain informed consent before capturing, publishing, or using identifiable media unless an exception is approved by leadership and counsel where appropriate.

For children, Maisha shall obtain parent or guardian consent and, where appropriate, child assent.

Consent must explain who is collecting media, how it may be used, whether it may appear online, whether it may be used for fundraising, whether it may be shared, and how removal may be requested.

Media consent shall not be coerced or made a condition of education, meals, health care, sponsorship, training, water access, employment, or other services.

Maisha shall not publish media depicting children, patients, or vulnerable persons in undress, humiliation, acute distress, medical exposure, unsafe conditions, or compromising circumstances.

Heightened review is required before using media involving medical treatment, disability, malnutrition, trauma, orphanhood, abuse, grief, extreme poverty, or family vulnerability.

Mission travelers, visitors, donors, sponsors, volunteers, contractors, and staff shall not independently post identifiable images or stories of children, patients, families, program participants, schools, clinics, or communities on personal social media without prior written approval.

### 6. Records and retention

Where feasible, Maisha shall maintain media records identifying consent status, usage restrictions, date, location, photographer, program area, review date, and approved uses.

### 7. Reporting and escalation

Removal requests and suspected unauthorized media use must be escalated to the Communications Lead, Privacy Lead, and Safeguarding Lead where children or vulnerable persons are involved.

### Appendix A: Operating procedures

Maisha shall remove geotags, unnecessary metadata, precise location indicators, and other information that could expose children, households, schools, clinics, patients, or vulnerable persons to harm.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Child Safeguarding Policy	Adult media consent form

## The Maisha Project Policy Manual

Child Data Policy	Child media consent form
Donor Privacy Policy	Media asset register
Website Privacy Policy	Mission team media acknowledgement

**Document control**

<b>Document title:</b> Health, Clinical, Hospital, Nutrition, and Medical Mission Privacy Policy	
<b>Scope:</b> Health programs, clinical services, medical missions, hospital planning, nutrition services, patient records, health outreach, and health-related reporting.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior health privacy policy identified. Source reference: Maisha Medical Clinic Strategic Plan, 2017-2020 Draft 4.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

Maisha is committed to protecting the confidentiality, dignity, and security of health-related information. This policy governs patient information, clinical records, health data, nutrition records, medical mission records, and health-related program information.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to clinical services, medical camps, medical missions, hospital operations, patient intake, referrals, nutrition activities, disability accommodations, pharmacy information, laboratory information, treatment records, medical images, public health reporting, and health-related impact reporting.

### 3. Definitions

Health information includes patient name, contact information, age, sex, medical history, diagnosis, treatment notes, medication information, referral information, laboratory information, disability information, nutrition status, maternal and child health information, images related to care, emergency contacts, and health program participation. Health information is restricted information.

### 4. Governance and accountability

Health Program Leadership manages clinical workflows and confidentiality procedures.

The Privacy Lead supports access controls, privacy requests, breach response, and record protection.

The Safeguarding Lead participates when health data involves children or safeguarding concerns.

The Executive Director ensures health privacy controls are in place before material expansion of clinical or hospital activities.

### 5. Operating requirements

Maisha may use health information for treatment, referral, continuity of care, patient administration, emergency response, medical mission coordination, public health reporting, nutrition support, legal compliance, audit, safeguarding, approved reporting, and legitimate health-related purposes.

Access to health information is limited to authorized clinical personnel, program personnel, administrative personnel, interpreters, referral partners, compliance personnel, legal counsel, or other authorized persons with a documented need.

Medical mission volunteers, clinicians, translators, administrative personnel, and others receiving access to health information must sign confidentiality undertakings.

Maisha shall not publish identifiable patient stories, photographs, diagnoses, treatment details, medical outcomes, or health hardship narratives without explicit consent, heightened review, and a dignity and risk assessment.

Patient records and health information shall not be stored in personal email accounts, personal cloud accounts, unsecured messaging applications, personal devices, or unapproved spreadsheets.

Where Maisha works with U.S.-licensed providers or U.S.-based health institutions, Maisha shall evaluate whether HIPAA applies. Even where HIPAA does not technically apply, Maisha will endeavor to apply HIPAA-aligned confidentiality, access, security, and disclosure safeguards as a prudent standard.

### 6. Records and retention

Health records shall be retained according to applicable law, clinical standards, patient care needs, legal obligations, audit requirements, and organizational policy.

### 7. Reporting and escalation

Suspected health privacy incidents must be escalated immediately to the Privacy Lead, Health Program Leadership, Executive Director, and counsel where appropriate.

### Appendix A: Operating procedures

Before material hospital or clinical expansion, Maisha shall adopt a dedicated clinical privacy manual, patient notice, medical records retention schedule, patient access procedure, breach procedure, referral protocol, workforce confidentiality protocol, and Kenya health compliance procedures.

### Supporting policies and documents

## The Maisha Project Policy Manual

Primary related policies	Operational documents and controls
Data Breach Policy	Patient confidentiality form
Child Safeguarding Policy	Medical mission participant agreement
Media Consent Policy	Clinical record access list
Kenya Data Protection Compliance Policy	Health data breach workflow

**Program Participant and Beneficiary Data Protection Policy**

**Document control**

<b>Document title:</b> Program Participant and Beneficiary Data Protection Policy	
<b>Scope:</b> Program participants, beneficiaries, community members, staff, partners, consultants, and vendors with access to program data.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior program participant data policy identified. Source reference: Terms of Reference for Maisha Strategic Planning Consultants, confidentiality provision.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy governs Maisha’s collection, use, disclosure, retention, and protection of program participant, beneficiary, and community data across Maisha’s development programs.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to agriculture, food security, school feeding, clean water, vocational training, empowerment, missions, health outreach, infrastructure, sponsorship, education support, and community development activities.

### 3. Definitions

Program data means information collected to determine eligibility, deliver services, monitor outcomes, report impact, improve programming, or comply with donor and legal obligations.

### 4. Governance and accountability

Program leaders ensure participant data is collected only for legitimate program purposes.

The Privacy Lead supports data minimization, access control, retention, and breach response.

The Executive Director ensures program data practices remain aligned with Maisha’s mission, donor duties, and beneficiary dignity.

### 5. Operating requirements

Maisha may collect participant names, contact information, age, gender, school affiliation, household information, training attendance, farm production data, employment outcomes, income-related indicators, food security information, water access information, meal participation, feedback, photographs, stories, and related program information.

Maisha shall collect program data only for legitimate program delivery, eligibility, safety, monitoring, evaluation, learning, grant reporting, donor reporting, service improvement, compliance, and organizational planning.

Where feasible, Maisha shall explain why information is collected, how it will be used, whether it will be shared, and whether participation is required or voluntary in a language and format understandable to the participant.

Program participation shall not be conditioned upon unnecessary media consent, public storytelling, donor visibility, or unrelated data collection.

Public reporting shall use aggregate, anonymized, or de-identified data whenever feasible.

### 6. Records and retention

Program data shall be retained only as long as necessary for program administration, reporting, evaluation, audit, legal, donor, grant, archival, and organizational purposes.

### 7. Reporting and escalation

Unauthorized disclosure, coercive collection, or public release of sensitive participant information must be escalated to the Privacy Lead.

### Supporting policies and documents

Primary related policies	Operational documents and controls
MERL Privacy Policy	Participant notice language
Media Consent Policy	Program data inventory
Data Protection Policy	Grant reporting review
Cross-Border Data Transfer Policy	De-identification checklist

**Document control**

<b>Document title:</b> Research, Monitoring, Evaluation, Learning, and Impact Reporting Privacy Policy	
<b>Scope:</b> Researchers, evaluators, consultants, staff, partners, grantors, academic collaborators, program participants, and any person with access to research, evaluation, or impact data.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior research or MERL privacy policy identified. Source reference: Terms of Reference for Maisha Strategic Planning Consultants, confidentiality provision.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy governs Maisha’s responsible collection, analysis, disclosure, publication, retention, and protection of research, monitoring, evaluation, learning, SROI, and impact reporting data.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to internal monitoring, grant reporting, external evaluations, academic partnerships, research projects, SROI analysis, donor reports, impact reports, surveys, interviews, focus groups, and program learning activities.

### 3. Definitions

MERL data means data collected for monitoring, evaluation, research, learning, impact reporting, or organizational improvement.

### 4. Governance and accountability

Program leaders define the purpose, methodology, and safeguards for MERL activities.

The Privacy Lead reviews privacy risks, consent, retention, and data sharing.

External researchers, universities, consultants, and evaluators must sign written agreements before receiving personal information.

The Executive Director approves high-risk research or evaluation involving children, health data, safeguarding data, vulnerable households, or cross-border transfers.

### 5. Operating requirements

Before research or evaluation involving personal information, Maisha shall define purpose, data needed, affected population, consent process, storage location, access controls, retention period, reporting format, and foreseeable risks.

Research or evaluation involving children, patients, health data, safeguarding data, vulnerable households, sensitive socioeconomic information, school records, or cross-border transfers requires heightened review.

Personal stories require appropriate consent and review.

Impact statistics must be accurate, supportable, and not misleading.

Maisha data shall not be used for unrelated academic publication, public datasets, commercial purposes, AI model training, or secondary research without written approval and, where required, renewed consent or ethics review.

### 6. Records and retention

Research and evaluation data shall be retained according to the retention schedule and any donor, grant, ethics, legal, or contractual requirements.

### 7. Reporting and escalation

Material research risks, publication disputes, data misuse, or re-identification concerns must be escalated to the Privacy Lead and Executive Director.

### Appendix A: Operating procedures

Minimum research review file: purpose, data fields, consent language, risk assessment, storage plan, access list, publication plan, retention period, and approval record.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Program Participant Data Policy	Research data sharing agreement
Child Data Policy	Survey consent script
Health Privacy Policy	De-identification checklist

AI Policy	Impact statistics evidence file
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**Internal Data Protection and Information Governance Policy**

**Document control**

<b>Document title:</b> Internal Data Protection and Information Governance Policy	
<b>Scope:</b> Staff, Board members, volunteers, interns, contractors, consultants, mission teams, vendors, and authorized representatives.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior data protection policy identified. Source references: Governance Policies 091815.pdf, Confidentiality and Record Retention; Terms of Reference for Maisha Strategic Planning Consultants, confidentiality provision.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy establishes Maisha’s internal framework for protecting personal information, confidential information, sensitive information, restricted information, and organizational records.

## 2. Scope

This policy applies to donor databases, child sponsorship records, school records, health records, program records, grant files, financial records, HR files, email accounts, cloud storage, spreadsheets, media libraries, Board records, legal files, and archived materials.

## 3. Definitions

Personal information means information identifying or reasonably linked to an individual. Sensitive information includes child data, health data, donor giving history, financial information, staff records, beneficiary data, and other data that may create harm if disclosed. Restricted information includes child safeguarding records, patient records, payment credentials, identity documents, legal files, abuse allegations, confidential HR investigations, precise household locations, passwords, and high-risk information.

## 4. Governance and accountability

Maisha shall designate a Privacy Lead.

The Executive Director is responsible for implementation.

The Board oversees material privacy, cybersecurity, donor confidentiality, health data, child data, and cross-border data risks.

Program owners are responsible for implementing this policy in their systems and workflows.

## 5. Operating requirements

Maisha shall classify information as Public, Internal, Confidential, or Restricted.

Maisha shall maintain a data inventory identifying data categories, persons affected, purposes, storage systems, access roles, third-party recipients, cross-border transfers, retention periods, and safeguards.

Access shall be based on role, purpose, authorization, and need to know. Access shall be removed when no longer required.

Confidential and restricted information must be stored only in approved systems. Restricted information shall not be stored in personal email accounts, personal cloud accounts, unsecured messaging apps, personal devices, or unapproved systems without approval.

Personnel with access to donor data, child data, health data, HR data, payment data, media assets, or restricted information must receive enhanced training.

## 6. Records and retention

Data records shall be retained according to Maisha’s retention policy and the applicable record category.

## 7. Reporting and escalation

Violations may result in retraining, access restriction, disciplinary action, contract termination, volunteer removal, reporting to authorities, or legal action.

## Appendix A: Operating procedures

Minimum annual review: update data inventory, review system access, confirm vendor list, test incident workflow, and brief leadership on material risks.

## Supporting policies and documents

Primary related policies	Operational documents and controls
Website Privacy Policy	Data inventory

## The Maisha Project Policy Manual

Donor Privacy Policy	Access review log
Data Breach Policy	Confidentiality agreement
Vendor Policy	System owner register

**Document control**

<b>Document title:</b> Kenya Data Protection Compliance Policy	
<b>Scope:</b> Kenya operations, U.S. personnel handling Kenya-origin data, staff, program teams, partners, vendors, researchers, consultants, and mission teams with access to Kenya-origin personal data.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior Kenya data protection policy identified. Source reference: Intended 2026 Policies, Kenya data protection and cybersecurity compliance assessment.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy establishes Maisha’s operating framework for handling Kenya-origin personal data in a manner consistent with Maisha’s obligations, Kenya program realities, donor requirements, and responsible international data protection practice.

## 2. Scope

This policy applies to personal data collected, generated, stored, accessed, transferred, published, or processed in connection with Maisha Kenya operations, including education, feeding, health, agriculture, vocational training, sponsorship, missions, research, media, donor reporting, and grant reporting.

## 3. Definitions

Kenya-origin personal data means personal information collected in Kenya or concerning persons in Kenya. Sensitive data includes child data, health data, biometric data, household vulnerability data, precise location, safeguarding records, financial data, and any information that may increase risk of harm if disclosed.

## 4. Governance and accountability

The Privacy Lead coordinates Kenya data compliance with Kenya Program Leadership.

Kenya Program Leadership maintains local data practices, staff training, consent processes, and referral contacts.

The Executive Director ensures cross-border sharing and donor reporting follow approved safeguards.

Vendors and partners processing Kenya-origin data must be reviewed under Maisha’s vendor and cross-border transfer policies.

## 5. Operating requirements

Maisha shall collect Kenya-origin personal data only for defined, lawful, mission-aligned purposes.

Maisha shall use proportionate data collection, data minimization, confidentiality, secure storage, and need-to-know access.

Child data, health data, safeguarding records, and household vulnerability information require heightened safeguards.

Cross-border transfer of Kenya-origin sensitive data requires necessity review, data minimization, authorization, security controls, and documentation.

Where aggregate, anonymized, or de-identified reporting will satisfy donor, grant, or public communication needs, Maisha shall use those forms rather than identifiable personal data.

Kenya personnel and U.S. personnel handling Kenya-origin data must receive role-appropriate data protection training.

## 6. Records and retention

Kenya-origin data shall be retained according to Maisha’s retention schedule and any applicable Kenya legal, donor, grant, medical, safeguarding, or operational requirements.

## 7. Reporting and escalation

Potential Kenya data protection incidents, regulator inquiries, or high-risk transfer concerns must be escalated to the Privacy Lead, Executive Director, and counsel where appropriate.

## Appendix A: Operating procedures

Minimum annual review: identify Kenya data systems; review consent forms; confirm access lists; review transfer map; update Kenya reporting contacts; and confirm training completion.

## Supporting policies and documents

Primary related policies	Operational documents and controls
Internal Data Protection Policy	Kenya data map
Cross-Border Data Transfer Policy	Kenya consent forms

## The Maisha Project Policy Manual

Child Data Policy	Transfer log
Health Privacy Policy	Kenya vendor register

**Vendor, Consultant, Platform, and Third Party Data Sharing Policy**

**Document control**

<b>Document title:</b> Vendor, Consultant, Platform, and Third Party Data Sharing Policy	
<b>Scope:</b> Vendors, consultants, contractors, platforms, service providers, grant partners, research partners, medical mission partners, and third parties processing Maisha data.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior vendor data policy identified. Source references: Financial Operations 091815.pdf, Contracts and Authority, Independent Contractors; Terms of Reference for Maisha Strategic Planning Consultants, confidentiality provision.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Financial Operations Manual identified in Financial Operations 091815.pdf, including separation of duties, cash controls, gifts, acknowledgments, and donation management. Exact original author and approval fields were not identified in the available file.	Maisha legacy financial operations authors, not identified in source file
January 2026	2.0	Expanded 2026 operational policy development reflected in Intended 2026 Policies and current governance drafting.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control and updated for donor privacy, payment security, cross-border operations, anti-fraud, and board oversight.	Jacob Breit, Director of Development

**1. Purpose**

## The Maisha Project Policy Manual

This policy governs Maisha’s sharing of personal information with third parties and establishes minimum review requirements for vendors, consultants, platforms, service providers, partners, and processors.

### 2. Scope

This policy applies to payment processors, donor management platforms, website hosts, email providers, accounting vendors, payroll providers, HR systems, event platforms, SMS providers, survey tools, cloud storage, media contractors, consultants, auditors, legal counsel, grant evaluators, travel vendors, medical mission partners, and research partners.

### 3. Definitions

Third party means any person or entity outside Maisha that processes, stores, accesses, transmits, or receives Maisha data.

### 4. Governance and accountability

The Privacy Lead reviews privacy and data protection issues.

The Finance Committee reviews financial vendors, accounting vendors, payment processors, procurement, and material vendor contracts.

Program leaders review programmatic necessity and operational suitability.

The Executive Director approves high-risk vendor relationships or delegates approval consistent with financial controls.

### 5. Operating requirements

Before sharing personal information with a third party, Maisha shall assess purpose, data categories, sensitivity, child or patient involvement, cross-border transfer, vendor security, subcontractors, retention practices, breach procedures, and contractual safeguards.

Vendor agreements involving personal information should include confidentiality, purpose limitation, processing instructions, data security, access controls, subcontractor restrictions, breach notification, return or deletion, audit cooperation, compliance with law, cross-border safeguards, and appropriate risk allocation.

Maisha shall not share restricted information with a vendor that cannot demonstrate reasonable safeguards.

Vendor access shall be limited to the information necessary to perform the authorized service.

Vendors shall not sell, reuse, retain, disclose, train AI systems on, or otherwise process Maisha data for unauthorized purposes.

### 6. Records and retention

Vendor due diligence, contracts, approvals, security reviews, data sharing decisions, and termination records shall be retained according to Maisha’s retention policy.

### 7. Reporting and escalation

Vendor breaches, unauthorized data uses, contract violations, or subcontractor concerns must be escalated to the Privacy Lead, Executive Director, Finance Committee, and counsel where appropriate.

### Appendix A: Operating procedures

Minimum vendor file: business purpose, data categories, sensitivity rating, contract, security notes, approval record, renewal date, and offboarding plan.

### Supporting policies and documents

<b>Primary related policies</b>	<b>Operational documents and controls</b>
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The Maisha Project Policy Manual

Cross-Border Data Transfer Policy	Vendor due diligence checklist
Data Breach Policy	Vendor data protection addendum
Financial Operations Policy	Approved vendor register
AI Policy	Vendor offboarding checklist

Document control

<b>Document title:</b> Cross-Border Data Transfer Policy	
<b>Scope:</b> U.S. and Kenya personnel, vendors, consultants, partners, donors, sponsors, researchers, and any third party involved in transferring Maisha data between jurisdictions.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior cross-border data transfer policy identified. Source reference: Intended 2026 Policies, Kenya data protection and cross-border considerations.	<b>Date of next review:</b> January 2028

Version control

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

1. Purpose

This policy governs the transfer, access, storage, or sharing of personal data across national borders in connection with Maisha’s U.S. fundraising, Kenya operations, international partnerships, donor reporting, cloud services, missions, and research.

## 2. Scope

This policy applies to transfers between Kenya, the United States, and any other jurisdiction through cloud platforms, email, donor systems, sponsorship reporting, grant reporting, mission coordination, accounting, research, monitoring, evaluation, communications, and technical support.

## 3. Definitions

Cross-border transfer means any access, transmission, storage, disclosure, or processing of personal data outside the country where it was collected or where the data subject is located.

## 4. Governance and accountability

The Privacy Lead maintains the cross-border transfer map.

The Executive Director approves high-risk transfers.

Program owners must identify when data will be accessed or stored internationally.

Vendors receiving cross-border data must be reviewed under the Vendor Policy.

## 5. Operating requirements

Before transferring sensitive or restricted information across borders, Maisha shall assess necessity, proportionality, legal basis, recipient reliability, country risk, security controls, data minimization, contractual safeguards, consent requirements, and whether aggregate or de-identified data can accomplish the purpose.

Child data, health data, safeguarding data, precise location data, household vulnerability data, identity documents, and donor financial information shall not be transferred internationally unless necessary, authorized, and protected.

Where aggregate, anonymized, or de-identified data can serve donor, grant, or public reporting needs, Maisha shall use those methods.

Recurring transfers must be documented in Maisha's transfer log.

High-risk transfers require review by the Privacy Lead and, where appropriate, counsel.

## 6. Records and retention

Transfer records, data sharing agreements, risk assessments, and approvals shall be retained according to Maisha's retention policy.

## 7. Reporting and escalation

Unauthorized transfers or cross-border disclosure incidents must be escalated under the Data Breach Policy.

## Appendix A: Operating procedures

Minimum transfer review: data category, source country, recipient country, purpose, necessity, sensitivity, recipient, safeguards, approval, and retention period.

## Supporting policies and documents

Primary related policies	Operational documents and controls
Kenya Data Protection Compliance Policy	Transfer impact checklist
Vendor Policy	Cross-border transfer log
Data Breach Policy	Data sharing agreement
Program Data Policy	De-identification review



The Maisha Project Policy Manual  
**Data Breach and Security Incident Response Policy**

**Document control**

<b>Document title:</b> Data Breach and Security Incident Response Policy	
<b>Scope:</b> All personnel, vendors, volunteers, contractors, consultants, mission travelers, and authorized representatives.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior data breach policy identified. Source reference: Intended 2026 Policies, cybersecurity and incident-notification compliance assessment.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy establishes Maisha’s process for identifying, reporting, escalating, investigating, containing, remediating, and documenting privacy and security incidents.

**2. Scope**

## The Maisha Project Policy Manual

This policy applies to incidents involving personal information, confidential information, restricted information, donor data, child data, health data, financial data, HR records, media assets, program data, vendor systems, or Maisha information systems.

### 3. Definitions

Incident means unauthorized access, acquisition, disclosure, loss, destruction, alteration, publication, ransomware, credential compromise, misdirected email, lost device, vendor breach, payment compromise, unauthorized social media posting, or any other event that may compromise information.

### 4. Governance and accountability

The Privacy Lead coordinates incident intake and privacy risk assessment.

The Executive Director coordinates organizational response and escalation.

The Board Governance Committee receives material incident reports.

Relevant program, finance, vendor, IT, safeguarding, and health leaders participate based on the incident type.

### 5. Operating requirements

All personnel must report suspected incidents immediately to the Privacy Lead and Executive Director.

Response steps include receiving and documenting the report, containing the incident, preserving evidence, identifying systems and records affected, assessing data sensitivity, assessing risk to individuals, notifying leadership, engaging counsel where appropriate, engaging vendors or insurers where appropriate, determining notification obligations, implementing remediation, and conducting post-incident review.

Incidents involving children, patients, health information, donor financial information, payment data, safeguarding records, identity documents, HR investigations, or public exposure receive expedited escalation.

No person may independently notify regulators, donors, media, affected persons, parents, guardians, patients, or the public concerning an incident without authorization from leadership and, where appropriate, counsel.

### 6. Records and retention

Maisha shall document incident facts, response steps, decisions, notifications, remediation, and lessons learned.

### 7. Reporting and escalation

Material incidents must be reported to the Board or designated committee. External notifications are determined by leadership and counsel based on applicable law, contractual obligations, donor duties, and risk to individuals.

### Appendix A: Operating procedures

Minimum incident file: date discovered, reporter, systems involved, data categories, people affected, containment steps, risk assessment, notifications, corrective actions, and closure.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Whistleblower Policy	Incident intake form
Data Protection Policy	Incident log
Vendor Policy	Post-incident review report
Health Privacy Policy	Notification decision record



**Document control**

<b>Document title:</b> Data Retention, Archival, and Secure Disposal Policy	
<b>Scope:</b> All organizational records, including donor, financial, program, health, child, HR, grant, media, Board, vendor, and legal records.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Governance Policies 091815.pdf, Section VI, Record Retention; Financial Operations 091815.pdf, Records and Data Entry.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Maisha governance baseline identified in Governance Policies 091815.pdf and related Financial Operations 091815.pdf. Exact original author and approval fields were not identified in the available files.	Maisha legacy governance authors, not identified in source file
January 2026	2.0	Expanded 2026 policy development reflected in Intended 2026 Policies and related governance drafting for safeguarding, anti-corruption, data, environmental, and inclusion controls.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control, updated for Maisha U.S. and Kenya operations, and aligned with donor privacy, child safeguarding, cross-border data, mission teams, health programs, and governance oversight.	Jacob Breit, Director of Development

## 1. Purpose

This policy governs retention, archival, deletion, destruction, and legal hold of Maisha records containing personal information, confidential information, restricted information, and organizational records.

## 2. Scope

This policy applies to donor records, gift documentation, accounting records, audit files, grant records, Board records, child sponsorship records, student records, health records, media consent records, volunteer records, mission records, HR records, payroll records, vendor contracts, safeguarding records, incident records, website records, analytics records, research data, and program records.

## 3. Definitions

Legal hold means a directive suspending routine deletion or destruction because litigation, investigation, audit, donor dispute, safeguarding matter, insurance matter, government inquiry, or other preservation obligation is known or reasonably anticipated.

## 4. Governance and accountability

The Executive Director oversees implementation.

The Finance Committee oversees financial, tax, audit, and gift record retention.

The Privacy Lead supports privacy-related retention, minimization, and secure disposal.

The Board Governance Committee oversees governance, Board, conflict, whistleblower, and legal hold records.

## 5. Operating requirements

Maisha shall retain records only as long as reasonably necessary for the purpose collected and for applicable legal, tax, accounting, donor, grant, audit, insurance, employment, medical, safeguarding, historical, and operational purposes.

Maisha shall maintain a detailed retention schedule identifying each record category, responsible owner, storage location, retention period, legal basis, archival rule, and disposal method.

Maisha shall suspend deletion or destruction of records subject to legal hold, audit, investigation, litigation, donor dispute, safeguarding matter, insurance matter, government inquiry, or other preservation obligation.

Paper records containing confidential or restricted information shall be shredded or securely destroyed. Digital records shall be deleted from active systems and, where feasible, backups according to system limitations and retention procedures.

Certain records may be retained for historical, governance, institutional memory, donor, legal, or safeguarding reasons. Archived records remain subject to access controls.

## 6. Records and retention

Retention schedule records, legal hold notices, destruction logs, and archival decisions shall be retained as governance records.

## 7. Reporting and escalation

Improper destruction, alteration, concealment, or deletion must be reported under the Whistleblower Policy and Litigation Hold Policy.

## Appendix A: Operating procedures

Minimum annual review: update retention schedule, confirm legal holds, review archive access, and verify secure disposal processes.

**Supporting policies and documents**

<b>Primary related policies</b>	<b>Operational documents and controls</b>
Litigation Hold Policy	Retention schedule
Whistleblower Policy	Legal hold notice
Data Breach Policy	Destruction log
Financial Operations Policy	Archive access list

**Document control**

<b>Document title:</b> Information Security, Artificial Intelligence (AI), and Acceptable Data Use Policy	
<b>Scope:</b> Staff, Board members, volunteers, interns, contractors, consultants, mission travelers, and authorized users of Maisha systems or data.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior information security or artificial intelligence policy identified. <b>Source references:</b> Financial Operations 091815.pdf, Accounting System Back-Up; Intended 2026 Policies, Cybersecurity section.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

This policy establishes minimum standards for protecting Maisha systems, accounts, devices, data, and artificial intelligence use.

## 2. Scope

This policy applies to Maisha email, cloud storage, donor systems, payment systems, HR systems, program databases, media libraries, AI tools, personal devices used for Maisha work, and all Maisha-controlled digital records.

## 3. Definitions

AI tool means any artificial intelligence, large language model, transcription, translation, summarization, analytics, or automated decision tool that receives, processes, generates, or stores data.

## 4. Governance and accountability

The Privacy Lead owns information governance and AI data restrictions.

The Executive Director ensures access, security, and acceptable use standards are implemented.

System owners manage access controls and user roles.

All users are responsible for protecting credentials and reporting suspected incidents.

## 5. Operating requirements

Maisha shall maintain reasonable safeguards, including role-based access, strong passwords, multi-factor authentication where feasible, encryption where appropriate, secure cloud storage, restricted sharing links, endpoint protection, software updates, backups, secure disposal, and access review.

Users shall not share passwords, leave devices unlocked in public areas, forward restricted information to personal accounts, store restricted information on personal devices without approval, use unauthorized cloud storage, or transmit restricted information through unsecured channels.

Personal devices used for Maisha work must be password-protected and reasonably secured. Restricted information shall not be stored on personal devices unless expressly approved.

Users shall not input, upload, paste, transmit, or provide restricted information to publicly accessible AI tools, transcription tools, translation tools, image generation tools, analytics platforms, or automated systems unless approved and appropriately protected.

Prohibited AI inputs include donor files, child sponsorship profiles, school records, patient records, health information, safeguarding records, family vulnerability data, payment information, HR records, passport information, precise locations, confidential partner data, passwords, unpublished legal materials, and identifiable beneficiary stories.

AI may be used for low-risk drafting, editing, formatting, brainstorming, public information summarization, non-sensitive translation, and analysis of de-identified or aggregate data, subject to human review.

AI shall not be used to make final decisions concerning school admission, scholarship eligibility, sponsorship selection, health care, employment, discipline, safeguarding, benefit allocation, or clinical prioritization without human review, documented basis, and leadership approval.

## 6. Records and retention

Security access logs, AI approvals, system access reviews, and incident reports shall be retained according to Maisha's retention policy.

## 7. Reporting and escalation

Users must immediately report suspected unauthorized access, lost devices, suspicious emails, password compromise, accidental disclosure, vendor incidents, or misuse of Maisha data.

## Appendix A: Operating procedures

Minimum quarterly control review: system access, MFA status, admin accounts, shared drives, approved AI tools, and restricted data storage locations.

**Supporting policies and documents**

Primary related policies	Operational documents and controls
Data Protection Policy	Acceptable use acknowledgement
Data Breach Policy	AI tool approval register
Vendor Policy	Access review log
HR Privacy Policy	Device security checklist

The Maisha Project Policy Manual  
**Payment and Financial Data Security Policy**

**Document control**

<b>Document title:</b> Payment and Financial Data Security Policy	
<b>Scope:</b> Donors, finance personnel, development personnel, Board members, staff, vendors, payment processors, event personnel, and any person handling payment or financial data.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Financial Operations 091815.pdf, Cash and Investments, Credit Cards, Cash Receipts, and Donation Management.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Financial Operations Manual identified in Financial Operations 091815.pdf, including separation of duties, cash controls, gifts, acknowledgments, and donation management. Exact original author and approval fields were not identified in the available file.	Maisha legacy financial operations authors, not identified in source file
January 2026	2.0	Expanded 2026 operational policy development reflected in Intended 2026 Policies and current governance drafting.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control and updated for donor privacy, payment security, cross-border operations, anti-fraud, and board oversight.	Jacob Breit, Director of Development

**1. Purpose**

This policy establishes controls for protecting payment information, donor financial data, bank information, event payments, sponsorship payments, online gifts, recurring donations, refunds, and financial transaction records.

## 2. Scope

This policy applies to online donations, checks, wire transfers, ACH payments, recurring gifts, event payments, sponsorship payments, refunds, donor receipts, payment processors, bank records, accounting systems, and reconciliation processes.

## 3. Definitions

Payment data means card, ACH, bank, transaction, check, wire, refund, and donation processing information. Restricted payment data includes full card numbers, card verification codes, bank account information, payment credentials, and donor financial details.

## 4. Governance and accountability

The Finance Committee oversees financial controls and payment security.

The Development Department coordinates donor-facing payment processes.

The Privacy Lead supports data protection and breach response.

Authorized vendors process payments under approved contractual and security terms.

## 5. Operating requirements

Maisha shall use reputable payment processors for online donations, recurring gifts, event payments, ACH, and card transactions.

Maisha shall not store full credit card numbers, card verification codes, magnetic stripe data, or equivalent sensitive authentication data in Maisha-controlled systems unless expressly approved by the Board and supported by validated payment-card compliance controls.

Donation records, accounting records, bank records, financial reports, restricted gift documentation, and audit materials shall be accessed only by authorized personnel with a finance, development, audit, legal, governance, or compliance need.

Payment information shall be used only for processing, reconciliation, receipts, refunds, accounting, audit, fraud prevention, legal compliance, and donor stewardship.

Suspected payment fraud, unauthorized transactions, compromised payment systems, donor financial data exposure, or bank account compromise shall be treated as high-priority incidents.

## 6. Records and retention

Payment and financial records shall be retained according to tax, accounting, audit, donor, grant, legal, and operational requirements.

## 7. Reporting and escalation

Payment incidents must be escalated immediately to the Executive Director, Finance Committee, Privacy Lead, payment processor, insurer, and counsel where appropriate.

## Appendix A: Operating procedures

Minimum controls: approved processor, limited access, no storage of full card data, reconciliation, segregation of duties, refund approval, incident escalation, and periodic vendor review.

## Supporting policies and documents

Primary related policies	Operational documents and controls
Donor Privacy Policy	Payment processor agreement

## The Maisha Project Policy Manual

Financial Operations Policy	Refund log
Data Breach Policy	Reconciliation records
Vendor Policy	Payment incident workflow

**Document control**

<b>Document title:</b> Human Resources, Volunteer, Board, Contractor, and Mission Team Privacy Policy	
<b>Scope:</b> Employees, applicants, Board members, volunteers, interns, contractors, consultants, mission travelers, study abroad participants, and authorized representatives.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> No standalone prior HR privacy policy identified. Source references: Governance Policies 091815.pdf, Board Governance Committee duties regarding Board Service Letter; Intended 2026 Policies, mission team safeguards.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	Initial June 2026 policy architecture developed for Maisha’s U.S. fundraising, Kenya programming, child data, donor data, and digital systems. No standalone or reference policy was identified in available internal records unless otherwise stated in the document-control source reference.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document-control and version-control format and expanded into a standalone policy within the June 2026 manual.	Jacob Breit, Director of Development

**1. Purpose**

## The Maisha Project Policy Manual

This policy governs Maisha's collection, use, disclosure, retention, and protection of personal information concerning employees, applicants, Board members, volunteers, interns, contractors, consultants, study abroad participants, and mission travelers.

### 2. Scope

This policy applies to recruitment, onboarding, payroll, travel, emergency response, safeguarding, supervision, performance management, discipline, insurance, legal compliance, and mission participation.

### 3. Definitions

Personnel information includes contact information, employment, volunteer, Board, contractor, mission, payroll, background check, travel, health disclosure, emergency contact, and training information relating to a person serving or seeking to serve Maisha.

### 4. Governance and accountability

The Executive Director owns implementation.

The HR designee manages personnel files and role access.

The Safeguarding Lead reviews roles involving children or vulnerable persons.

The Privacy Lead supports confidentiality, retention, data minimization, and incident response.

### 5. Operating requirements

Maisha may collect contact information, application materials, resumes, references, background check information, identification documents, passport details, visa information, travel itineraries, emergency contacts, health information voluntarily provided for travel safety, dietary needs, accommodation needs, training records, payroll information, banking information, tax forms, signed waivers, confidentiality agreements, and incident reports.

Maisha may use this information for recruitment, eligibility review, onboarding, payroll, tax compliance, travel coordination, emergency response, safeguarding, supervision, training, insurance, legal compliance, discipline, and operational administration.

Personnel records shall be accessed only by authorized persons with a legitimate need.

Background checks, medical disclosures, passport details, bank information, disciplinary records, and safeguarding records are restricted information.

Mission travelers and study abroad participants shall complete privacy, child protection, media, and confidentiality training before travel.

Mission travelers and study abroad participants shall not collect, copy, publish, disclose, post, transmit, store, or retain personal information, photographs, videos, audio recordings, stories, medical information, school records, sponsorship information, household information, or confidential information except as expressly authorized by Maisha.

### 6. Records and retention

HR, volunteer, Board, contractor, study abroad, and mission records shall be retained according to Maisha's retention schedule and applicable legal, insurance, safeguarding, employment, tax, and operational requirements.

### 7. Reporting and escalation

Personnel privacy incidents, unauthorized disclosures, or safeguarding screening concerns must be escalated to the Executive Director, Privacy Lead, and Safeguarding Lead where applicable.

### Appendix A: Operating procedures

Minimum mission privacy file: participant information, emergency contact, signed privacy acknowledgement, safeguarding training record, media agreement, and post-trip data return confirmation.

**Supporting policies and documents**

<b>Primary related policies</b>	<b>Operational documents and controls</b>
Child Safeguarding Policy	Mission team privacy acknowledgement
Media Consent Policy	Volunteer agreement
Data Protection Policy	Confidentiality undertaking
Whistleblower Policy	Personnel access log

**Document control**

<b>Document title:</b> Anti-Terrorism, Sanctions, Anti-Corruption, and Anti-Fraud Policy	
<b>Scope:</b> Board members, staff, volunteers, mission teams, contractors, vendors, partners, subrecipients, consultants, and persons handling Maisha funds, goods, grants, or assets.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Intended 2026 Policies, Anti-Terrorism, Sanctions, Anti-Corruption, and Anti-Fraud Policy; Financial Operations 091815.pdf, internal controls and cash disbursement controls.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Financial Operations Manual identified in Financial Operations 091815.pdf, including separation of duties, cash controls, gifts, acknowledgments, and donation management. Exact original author and approval fields were not identified in the available file.	Maisha legacy financial operations authors, not identified in source file
January 2026	2.0	Expanded 2026 operational policy development reflected in Intended 2026 Policies and current governance drafting.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control and updated for donor privacy, payment security, cross-border operations, anti-fraud, and board oversight.	Jacob Breit, Director of Development

**1. Purpose**

## The Maisha Project Policy Manual

Maisha maintains zero tolerance for corruption, bribery, kickbacks, embezzlement, fraud, diversion of charitable assets, and any support for terrorism or sanctioned activity. This policy establishes due diligence, screening, documentation, and escalation controls appropriate for Maisha's cross-border operations, Kenya program delivery, and U.S. fundraising.

### 2. Scope

This policy applies to all funds, goods, services, grants, contracts, vendors, partners, subrecipients, procurements, mission expenditures, donor-restricted funds, in-kind gifts, program supplies, and cross-border transactions.

### 3. Definitions

Fraud includes false invoicing, falsified receipts, ghost vendors, payroll fraud, inflated expenses, misrepresentation, or unauthorized diversion of assets. Corruption includes bribery, kickbacks, facilitation payments, and improper benefits.

### 4. Governance and accountability

The Finance Committee oversees financial controls, anti-fraud procedures, and material cross-border payment controls.

The Executive Director implements operating procedures and escalation.

The Board Governance Committee reviews misconduct, conflict, and whistleblower matters.

Program leaders ensure partners and vendors comply with documentation and due diligence requirements.

### 5. Operating requirements

Offering, giving, soliciting, or receiving anything of value to influence a decision is prohibited.

Unofficial payments to expedite routine actions are prohibited.

Funds, goods, or services must not be diverted for personal gain, political purposes, prohibited groups, or unauthorized uses.

False invoicing, falsified receipts, ghost vendors, payroll fraud, inflated expenses, and misrepresentation are prohibited.

No person may personally benefit through commissions tied to gifts, sponsorships, grants, or donor contributions.

Maisha shall use a risk-based approach to screening higher-risk partners, vendors, subrecipients, and transactions.

Higher-risk transactions may require documentation of identity, ownership, purpose, bank details, program purpose, and recipient legitimacy.

Material purchases should be supported by documentation, quotations where feasible, approval records, and business purpose.

Related party procurements must be reviewed under the Conflict of Interest Policy.

### 6. Records and retention

Due diligence, screening, approvals, invoices, receipts, contracts, and payment records must be retained according to Maisha's retention policy.

### 7. Reporting and escalation

Suspected fraud, diversion, bribery, sanctions issues, or corruption must be reported under the Whistleblower Policy and escalated to the Executive Director, Finance Committee, Board Governance Committee, and counsel where appropriate.

### Appendix A: Operating procedures

Minimum transaction file for higher-risk payments: recipient identity, business purpose, approval, supporting invoice, payment record, screening where applicable, and reconciliation.

**Supporting policies and documents**

Primary related policies	Operational documents and controls
Whistleblower Policy	Due diligence checklist
Conflict of Interest Policy	Sanctions screening log
Financial Operations Policy	Procurement file
Vendor Policy	Fraud incident log

The Maisha Project Policy Manual  
**Equity, Inclusion, Non-Discrimination, and Accessibility Policy**

**Document control**

<b>Document title:</b> Equity, Inclusion, Non-Discrimination, and Accessibility Policy	
<b>Scope:</b> Board members, staff, volunteers, mission teams, contractors, vendors, partners, program participants, and persons interacting with Maisha programs.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Intended 2026 Policies, Equity, Diversity, and Inclusion Policy.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	New standalone 2026 policy framework developed for Maisha’s expanded operating model. No standalone or reference policy was identified for the 2015 governance baseline.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document control and integrated with Maisha governance, privacy, safeguarding, data, donor, and cross-border controls.	Jacob Breit, Director of Development

**1. Purpose**

Maisha operates as a U.S. 501(c)(3) and implements programs in Kenya serving vulnerable communities. Equity, inclusion, non-discrimination, and accessibility strengthen program effectiveness, staff conduct, volunteer conduct, donor trust, and grant readiness.

**2. Scope**

This policy applies to governance, employment, volunteer engagement, mission participation, service delivery, partnerships, procurement, communications, donor engagement, and program access.

**3. Definitions**

Accessibility means reasonable efforts to enable participation by persons with disabilities or access barriers within operational feasibility, safety constraints, and program design.

#### 4. Governance and accountability

The Executive Director implements this policy in employment, volunteer, and program practices.

The Board Governance Committee oversees governance-level equity, inclusion, non-discrimination, and accessibility commitments.

Program leaders incorporate community voice and culturally appropriate practices.

All covered persons are responsible for respectful conduct.

#### 5. Operating requirements

Maisha prohibits discrimination, harassment, and retaliation in governance, employment, volunteer engagement, service delivery, and partnership activity.

Beneficiaries, staff, volunteers, donors, and partners are treated with dignity, privacy, and cultural humility.

Maisha will make reasonable efforts to ensure program access for individuals with disabilities, within operational feasibility, safety constraints, and program design.

Hiring, advancement, procurement, volunteer selection, and program roles are based on documented role requirements, competence, safety, and mission alignment.

Kenya programming should incorporate community voice, feedback mechanisms, and culturally appropriate practices.

Maisha shall avoid quotas, set-asides, or eligibility rules based on protected traits unless counsel confirms permissibility for a specific program.

#### 6. Records and retention

Reports, accommodations, complaints, and corrective actions are retained according to Maisha’s retention policy.

#### 7. Reporting and escalation

Concerns regarding discrimination, harassment, retaliation, or exclusion may be reported under the Whistleblower Policy or HR procedures.

#### Appendix A: Operating procedures

Minimum annual review: training completion, complaint trends, accessibility barriers, recruitment practices, and beneficiary feedback mechanisms.

#### Supporting policies and documents

Primary related policies	Operational documents and controls
Whistleblower Policy	Respectful conduct training
HR Privacy Policy	Accessibility request process
Safeguarding Policy	Community feedback log
Program Participant Data Policy	Complaint record

**Document control**

<b>Document title:</b> Environmental Sustainability and Project Screening Policy	
<b>Scope:</b> Board members, staff, contractors, vendors, partners, agriculture programs, infrastructure projects, school programs, health facilities, solar projects, water projects, and construction activities.	
<b>Version:</b> 2.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Intended 2026 Policies, Environmental Sustainability section.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
January 2026	1.0	New standalone 2026 policy framework developed for Maisha’s expanded operating model. No standalone or reference policy was identified for the 2015 governance baseline.	Jacob Breit, Director of Development
June 2026	2.0	Reformatted into standardized document control and integrated with Maisha governance, privacy, safeguarding, data, donor, and cross-border controls.	Jacob Breit, Director of Development

**1. Purpose**

Maisha is committed to environmentally responsible development, sustainable livelihoods, food systems, renewable energy, clean water, regenerative agriculture, and community-centered infrastructure. This policy establishes an environmental screening process for projects that may affect land, water, energy, waste, biodiversity, soil, public health, or community wellbeing.

**2. Scope**

This policy applies to solar installations, water systems, school infrastructure, health infrastructure, farms, agroforestry, aquaculture, poultry, construction, waste management, sanitation, kitchens, dormitories, medical facilities, and partner-supported infrastructure.

**3. Definitions**

## The Maisha Project Policy Manual

Environmental screening means a structured review to identify environmental, social, health, permitting, and mitigation issues before implementing a project.

### 4. Governance and accountability

Program Leadership owns project screening and environmental operating controls.

The Executive Director ensures material environmental risks are reviewed before implementation.

The Board Governance Committee receives reports on major projects and policy exceptions.

Vendors and contractors must comply with reasonable environmental, safety, waste, and community protection requirements.

### 5. Operating requirements

Maisha will seek to reduce environmental harm and strengthen community resilience.

Maisha will prioritize regenerative agriculture, responsible water use, renewable energy, soil health, safe waste management, and climate-sensitive program design.

Before material infrastructure or land-use projects, Maisha shall assess whether permits, approvals, or environmental review are required; potential impacts on water, soil, biodiversity, waste, public health, land use, and community safety; whether community consultation is appropriate; whether specialist review, engineering review, environmental review, or legal review is needed; and whether mitigation measures are required.

For Kenya-based projects, Maisha shall assess whether environmental review, permitting, county approvals, health approvals, water approvals, construction approvals, or NEMA-related processes may apply.

### 6. Records and retention

Environmental screenings, approvals, permits, consultant reports, mitigation plans, and monitoring records shall be retained according to Maisha's retention policy.

### 7. Reporting and escalation

Material environmental, permitting, safety, or community concerns must be escalated to Program Leadership, the Executive Director, and the Board where appropriate.

### Appendix A: Operating procedures

Minimum screening file: project description, location, environmental risks, permits, community considerations, vendor requirements, mitigation plan, and approval record.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Vendor Policy	Project screening checklist
Financial Operations Policy	Permit file
Program Data Policy	Contractor safety requirements
Anti-Fraud Policy	Mitigation plan

**Document control**

<b>Document title:</b> Public Access to Records and Governance Transparency Policy	
<b>Scope:</b> Board members, officers, Executive Director, finance personnel, development personnel, and anyone responding to public records requests.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Governance Policies 091815.pdf, Status and Authority; Financial Operations 091815.pdf, Public Access to Records.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Maisha governance baseline identified in Governance Policies 091815.pdf and related Financial Operations 091815.pdf. Exact original author and approval fields were not identified in the available files.	Maisha legacy governance authors, not identified in source file
January 2026	2.0	Expanded 2026 policy development reflected in Intended 2026 Policies and related governance drafting for safeguarding, anti-corruption, data, environmental, and inclusion controls.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control, updated for Maisha U.S. and Kenya operations, and aligned with donor privacy, child safeguarding, cross-border data, mission teams, health programs, and governance oversight.	Jacob Breit, Director of Development

### 1. Purpose

This policy governs Maisha’s public access obligations, transparency practices, donor confidentiality protections, and review procedures before releasing organizational records.

### 2. Scope

This policy applies to public requests for tax filings, exemption applications, governance documents, financial statements, Form 990, charitable registration materials, and other records Maisha makes available by law, policy, donor requirement, or Board decision.

### 3. Definitions

Public record means a record Maisha is legally required to make available or voluntarily makes available under Board-approved transparency practices.

### 4. Governance and accountability

The Executive Director controls public records responses unless delegated.

The Finance Committee oversees tax filings, financial statements, and charitable registration materials.

The Board Governance Committee oversees governance documents and policy disclosure practices.

Development and privacy personnel assist with donor confidentiality review.

### 5. Operating requirements

Maisha shall make legally required public records available in accordance with applicable law.

Contributor names, addresses, donor schedules, private donor notes, restricted donor information, donor financial information, and information not required for public disclosure shall be protected to the extent permitted by law.

Before releasing records, Maisha shall review for Schedule B contributor names and addresses, bank account information, Social Security numbers or tax identification numbers not required for disclosure, signatures, private donor notes, child data, patient data, beneficiary data, safeguarding information, confidential contracts, and legal information.

Public records should be released only by the Executive Director, Finance Committee designee, Board officer, or other authorized person.

### 6. Records and retention

Public disclosure requests and responses shall be documented and retained according to Maisha’s retention policy.

### 7. Reporting and escalation

Unusual requests, requests from media, subpoenas, regulator inquiries, or requests involving sensitive data must be escalated to the Executive Director and counsel where appropriate.

### Appendix A: Operating procedures

Minimum release checklist: identify requested record, confirm legal disclosure status, review for protected information, redact where appropriate, document requester and response.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Donor Privacy Policy	Public records request log

## The Maisha Project Policy Manual

Data Retention Policy	Redaction checklist
Legal Matters Policy	Form 990 public copy
Financial Operations Policy	Governance document index

The Maisha Project Policy Manual  
**Indemnification and Legal Matters Escalation Policy**

**Document control**

<b>Document title:</b> Indemnification and Legal Matters Escalation Policy	
<b>Scope:</b> Board members, officers, committee members, staff, agents, volunteers, and persons serving Maisha at its request.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Governance Policies 091815.pdf, Legal and Internal Revenue Service Matters; Governance Policies 091815.pdf, Indemnification Policy.	<b>Date of next review:</b> January 2028

**Version control**

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September 2015	1.0	Legacy Maisha governance baseline identified in Governance Policies 091815.pdf and related Financial Operations 091815.pdf. Exact original author and approval fields were not identified in the available files.	Maisha legacy governance authors, not identified in source file
January 2026	2.0	Expanded 2026 policy development reflected in Intended 2026 Policies and related governance drafting for safeguarding, anti-corruption, data, environmental, and inclusion controls.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control, updated for Maisha U.S. and Kenya operations, and aligned with donor privacy, child safeguarding, cross-border data, mission teams, health programs, and governance oversight.	Jacob Breit, Director of Development

## 1. Purpose

This policy establishes procedures for legal matters, indemnification considerations, preservation of rights, insurance coordination, and escalation of legal correspondence or proceedings.

## 2. Scope

This policy applies to legal correspondence, subpoenas, claims, investigations, lawsuits, threatened claims, employment disputes, donor disputes, contract disputes, insurance matters, regulatory inquiries, child protection matters, data privacy incidents, and governance disputes.

## 3. Definitions

Legal matter means any actual or threatened claim, proceeding, investigation, subpoena, demand, regulatory communication, legal notice, or matter that may require counsel, insurance, preservation, or Board attention.

## 4. Governance and accountability

The Executive Director and Board Chair receive immediate notice of legal and regulatory matters.

The Board Governance Committee oversees governance-level legal issues and indemnification considerations.

Counsel should be engaged where legal rights, duties, or exposure require professional advice.

No person may respond to legal demands, subpoenas, regulator inquiries, media inquiries concerning legal matters, or threatened claims without authorization.

## 5. Operating requirements

All legal and regulatory matters, written or verbal, shall be directed immediately to the Executive Director and Board Chair. Such matters shall be reported to the Board in a timely manner.

Maisha shall consider indemnification for eligible persons to the fullest extent permitted by applicable law, bylaws, insurance coverage, and Board approval, provided the person acted in good faith, in a manner reasonably believed to be in Maisha's best interest, and without willful misconduct or unlawful conduct.

Potential claims must be reported promptly so that insurance notice requirements are not missed.

Legal records are restricted records and must be preserved according to Maisha's retention and legal hold policies.

## 6. Records and retention

Legal records, claim files, insurance notices, counsel communications, and indemnification determinations shall be retained according to legal hold and retention requirements.

## 7. Reporting and escalation

Legal matters must be escalated promptly to the Executive Director, Board Chair, Board Governance Committee, and counsel where appropriate.

## Appendix A: Operating procedures

Minimum legal matter file: notice received, date, sender, subject, persons involved, immediate action, counsel contact, insurance notice, legal hold status, and Board reporting.

## Supporting policies and documents

Primary related policies	Operational documents and controls
Litigation Hold Policy	Legal intake log
Whistleblower Policy	Insurance notice record

## The Maisha Project Policy Manual

Data Breach Policy	Counsel engagement record
Data Retention Policy	Legal hold file

**Litigation Hold and Destruction of Litigation-Related Documents Policy**

**Document control**

<b>Document title:</b> Litigation Hold and Destruction of Litigation-Related Documents Policy	
<b>Scope:</b> Board members, officers, staff, volunteers, contractors, consultants, vendors, and any person with custody of relevant Maisha records.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Governance Policies 091815.pdf, Section X, Destruction of Litigation-Related Documents.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Maisha governance baseline identified in Governance Policies 091815.pdf and related Financial Operations 091815.pdf. Exact original author and approval fields were not identified in the available files.	Maisha legacy governance authors, not identified in source file
January 2026	2.0	Expanded 2026 policy development reflected in Intended 2026 Policies and related governance drafting for safeguarding, anti-corruption, data, environmental, and inclusion controls.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control, updated for Maisha U.S. and Kenya operations, and aligned with donor privacy, child safeguarding, cross-border data, mission teams, health programs, and governance oversight.	Jacob Breit, Director of Development

### 1. Purpose

This policy prohibits improper destruction, alteration, concealment, deletion, falsification, or withholding of records when litigation, investigation, audit, regulatory inquiry, whistleblower report, safeguarding matter, privacy incident, donor dispute, or official proceeding is known or reasonably anticipated.

### 2. Scope

This policy applies to paper records, digital files, emails, texts, messaging apps, cloud folders, spreadsheets, financial records, donor records, child records, health records, program records, media assets, Board records, legal files, and vendor records.

### 3. Definitions

Litigation hold means a directive requiring preservation of records because a claim, investigation, audit, subpoena, regulator inquiry, whistleblower report, safeguarding matter, privacy incident, or official proceeding is known or reasonably anticipated.

### 4. Governance and accountability

The Executive Director coordinates legal hold implementation.

The Board Governance Committee oversees governance-level compliance.

Counsel advises on scope and release of legal holds where appropriate.

All custodians are responsible for preserving relevant records once notified.

### 5. Operating requirements

No person may destroy, alter, conceal, falsify, backdate, delete, overwrite, or modify records to obstruct or influence an investigation, audit, legal proceeding, regulator, donor review, grantor review, or law enforcement inquiry.

When a legal hold is issued, routine deletion or destruction of relevant records must stop immediately.

Persons receiving a legal hold must preserve relevant materials and confirm compliance.

Only authorized leadership or counsel may release a legal hold.

Violations may result in discipline, termination, removal, contract termination, referral to authorities, or legal action.

### 6. Records and retention

Legal hold notices, custodian confirmations, preserved records, release notices, and related correspondence shall be retained as restricted legal records.

### 7. Reporting and escalation

Suspected destruction, alteration, concealment, or deletion of covered records must be reported under the Whistleblower Policy and escalated to leadership and counsel.

### Appendix A: Operating procedures

Minimum workflow: identify triggering event, issue hold notice, identify custodians, suspend deletion, preserve records, monitor compliance, document release when authorized.

### Supporting policies and documents

Primary related policies	Operational documents and controls
Whistleblower Policy	Legal hold notice template

## The Maisha Project Policy Manual

Data Retention Policy	Custodian list
Legal Matters Policy	Preservation checklist
Data Breach Policy	Release notice

**Document control**

<b>Document title:</b> Financial Operations and Internal Controls Policy	
<b>Scope:</b> Board members, Executive Director, finance personnel, development personnel, staff, contractors, vendors, grant managers, and any person authorizing, handling, recording, or reviewing Maisha funds.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Financial Operations 091815.pdf.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Financial Operations Manual identified in Financial Operations 091815.pdf, including separation of duties, cash controls, gifts, acknowledgments, and donation management. Exact original author and approval fields were not identified in the available file.	Maisha legacy financial operations authors, not identified in source file
January 2026	2.0	Expanded 2026 operational policy development reflected in Intended 2026 Policies and current governance drafting.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control and updated for donor privacy, payment security, cross-border operations, anti-fraud, and board oversight.	Jacob Breit, Director of Development

**1. Purpose**

This policy establishes baseline financial governance, internal controls, segregation of duties, payment authorization, grant documentation, gift administration, donor acknowledgment, and financial recordkeeping standards for Maisha.

## 2. Scope

This policy applies to budgeting, cash disbursements, bank transfers, checks, ACH payments, credit cards, reimbursements, petty cash, deposits, grants, contracts, vendors, independent contractors, gifts, acknowledgments, restricted support, accounting records, and Board financial reporting.

## 3. Definitions

Internal controls means policies and procedures designed to protect assets, ensure accurate records, promote accountability, prevent fraud, and support compliance.

## 4. Governance and accountability

The Finance Committee provides financial oversight and reports the fiscal position of Maisha to the Board.

The Executive Director approves invoices, check requests, purchase orders, reimbursements, and operational disbursements consistent with approval thresholds.

The Treasurer supports financial oversight, reconciliation review, budget support, and Board reporting.

Finance personnel maintain records, reconcile accounts, support grant reporting, and protect accounting data.

## 5. Operating requirements

Maisha shall maintain separation of duties to the extent feasible based on staffing and operational capacity.

Financial reports shall be provided to the Board at least quarterly and should include financial position, activity compared to budget, and other reports requested by the Board or Finance Committee.

Contracts not provided for in the Board-approved budget must be approved according to applicable authority levels.

Payment requests must be supported by invoices, contracts, purchase orders, payment request forms, or other documentation proving legitimacy and business purpose.

Checks written to cash, blank signed checks, checks written and signed by the same person, checks written to a check signer and signed by the same signer, and credit card cash withdrawals are prohibited.

Donor gifts and pledges shall be recorded, acknowledged, and tracked, including restricted support.

Conflicts of interest involving finance matters shall be reported to the Governance Committee.

## 6. Records and retention

Financial records shall be retained according to Maisha's retention schedule, tax requirements, audit requirements, grant requirements, donor substantiation rules, and legal obligations.

## 7. Reporting and escalation

Financial irregularities, fraud concerns, undocumented payments, control violations, or conflicts must be escalated to the Executive Director, Treasurer, Finance Committee, Board Chair, or Whistleblower reporting channel.

## Appendix A: Operating procedures

Minimum payment file: request, invoice or support, approval, conflict review where applicable, payment record, accounting code, and reconciliation.

## Supporting policies and documents

Primary related policies	Operational documents and controls
Anti-Fraud Policy	Separation of duties schedule
Conflict of Interest Policy	Payment request form

## The Maisha Project Policy Manual

Payment Security Policy	Reconciliation file
Donor Privacy Policy	Board financial report

**Document control**

<b>Document title:</b> Board Governance, Policy Review, and Manual Integration Policy	
<b>Scope:</b> Board members, committee members, Executive Director, senior staff, policy owners, and persons responsible for implementing Maisha governance policies.	
<b>Version:</b> 3.0	<b>Author(s):</b> Jacob Breit, Director of Development
<b>Date approved:</b> June 2026	<b>Document status:</b> Final for organizational adoption, subject to on-going counsel and executive board review
<b>Effective date:</b> June 2026	<b>Approved by:</b> Beatrice Williamson, Founder and Executive Director
<b>Source reference / superseded version:</b> Governance Policies 091815.pdf; Bylaws 091815.pdf; Financial Operations 091815.pdf.	<b>Date of next review:</b> January 2028

**Version control**

Date	Version	Reason for change	Author
September 2015	1.0	Legacy Maisha governance baseline identified in Governance Policies 091815.pdf and related Financial Operations 091815.pdf. Exact original author and approval fields were not identified in the available files.	Maisha legacy governance authors, not identified in source file
January 2026	2.0	Expanded 2026 policy development reflected in Intended 2026 Policies and related governance drafting for safeguarding, anti-corruption, data, environmental, and inclusion controls.	Jacob Breit, Director of Development
June 2026	3.0	Reformatted into standardized document control, updated for Maisha U.S. and Kenya operations, and aligned with donor privacy, child safeguarding, cross-border data, mission teams, health programs, and governance oversight.	Jacob Breit, Director of Development

# The Maisha Project Policy Manual

## 1. Purpose

This policy establishes how Maisha’s governance, privacy, safeguarding, financial, and compliance policies are maintained, acknowledged, reviewed, amended, and integrated with the bylaws and Board committee structure.

## 2. Scope

This policy applies to Maisha’s Board, committees, governance manual, policy manual, acknowledgments, annual reviews, amendments, committee responsibilities, and policy implementation records.

## 3. Definitions

Policy owner means the role, committee, or department responsible for maintaining, implementing, and reviewing a policy.

## 4. Governance and accountability

The Board Governance Committee reviews and recommends changes to the governance and policy manual.

The Executive Director ensures implementation by staff, volunteers, contractors, and program leaders.

Policy owners maintain operational procedures, training, and records.

The Board receives periodic updates on material policy risks and approves changes when required.

## 5. Operating requirements

Each director shall receive the bylaws, Conflict of Interest Policy, Whistleblower Policy, Donor Privacy Policy, Data Protection Policy, Safeguarding Policy, and other applicable policies and acknowledge in writing that they have read, understand, and agree to comply.

Each policy shall include document control, version control, owner, approval information, effective date, next review date, and supporting documents.

Policy amendments should be reviewed by the appropriate policy owner and approved according to Board authority, bylaws, and governance procedures.

Where legacy policies conflict with later Board-approved or Executive Director-approved policies, the later approved policy controls unless the bylaws, articles of incorporation, applicable law, donor restriction, court order, regulator instruction, or grant agreement requires otherwise.

The policy manual shall be reviewed no later than January 2028 and annually thereafter unless the Board adopts a different review cycle.

## 6. Records and retention

Policy acknowledgments, prior versions, Board approvals, revision notes, and training records shall be retained as governance records.

## 7. Reporting and escalation

Material policy gaps, outdated policies, regulatory changes, donor requirements, or significant incidents must be reported to the Board Governance Committee.

## Appendix A: Operating procedures

Minimum annual governance review: policy index, approval records, acknowledgments, conflict disclosures, whistleblower report summary, training completion, incident trends, and recommended revisions.

## Supporting policies and documents

Primary related policies	Operational documents and controls
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## The Maisha Project Policy Manual

Conflict of Interest Policy	Policy index
Whistleblower Policy	Board acknowledgement form
Data Protection Policy	Version control register
Data Retention Policy	Annual policy review memo

The Maisha Project Policy Manual

**Manual approval and adoption**

By signing below, the undersigned acknowledges approval of this manual for organizational adoption, subject to on-going counsel and executive board review and any Board action required by Maisha’s bylaws, governance policies, donor obligations, or applicable law.

Approved by: Beatrice Williamson, Founder and Executive Director

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Prepared by: Jacob Breit, Director of Development

Signature: \_\_\_\_\_

Date: \_\_\_\_\_