AMNAYA / PROPOSED POLICY FRAMEWORK

Policy implementation playbook

An accountable 100-day adoption and control-testing plan for a small team. Dates are relative to a separately authorised implementation start.

DRAFT v0.1 | 5 November 2026 | NOT ADOPTED
Effective date: not set. Governing-body approval, entity scope, responsible persons and local/sector annexes must be completed before implementation. Publication is not evidence of current practice, compliance, membership or external assurance.

Before Day 1

Name the legal entity, authority, coordinator, independent reviewer and scope. Cost the implementation. Identify critical hazards, required permissions and current control gaps. Nothing in this schedule authorises live regulated activity or releases budget.

The operating file

Use the editable adoption, control-evidence, SDG-impact, IFRS-gap and exception registers supplied with the pack. Keep restricted evidence in private storage; public exports contain planning inputs only.

Clock convention	Rule
Day 1-100	Calendar days, inclusive. Gate dates depend on the chosen start date.
Business-day targets	Apply a defined local working calendar and holidays; do not silently use calendar days.
Incident and statutory clocks	Immediate protection and shorter applicable legal deadlines override internal service targets.
Policy effect	No implementation schedule or checkbox substitutes for lawful entity adoption.

Days 1-7 / Establish authority and safe boundaries

Required work

Map entities and actual decision rights; appoint coordinator and independent reviewer; identify critical permissions, immediate hazards and unverified public claims.

Required evidence

Scope sheet, role/delegation draft, critical-hold register

> Decision boundary: Do not create a new mandate or commit funds without existing lawful authority.

Accountability and acceptance

The coordinator assigns named owners and due dates in the control register. The relevant finance, territory/sector, technical and information leads produce evidence. A disinterested reviewer checks critical matters. The lawful decision owner records the outcome and permitted next scope.

Review questions

1. What changed from the approved baseline and why?

2. Which required records are absent, stale or outside the actual entity/site/activity?

3. Which critical holds prevent the next activity?

4. Do the roles, limits, data quality and resources support the proposed commitment?

5. Who will verify the corrective action, by when, and against which evidence?

Record: scope/version | evidence IDs | reviewer | findings | conditions | proceed/revise/hold/stop | authority | next review.

Days 8-21 / Assess the baseline

Required work

Map people, suppliers, data, assets, reporting requirements and priority SDG targets; review material risks and stakeholder impacts.

Required evidence

Entity/sector/territory annex, baseline and gap register

> Decision boundary: Unresolved critical rights, safety, legal or confidentiality exposures retain a hold.

Accountability and acceptance

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Review questions

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Days 22-42 / Design the controls

Required work

Review policy clauses and numeric defaults; develop finance/disclosure memos, training, grievance channel and continuity plan; cost the implementation.

Required evidence

Local annexes, configured thresholds, reviewer findings and resourced plan

> Decision boundary: Independent review of technical, accounting and legal applicability before adoption recommendation.

Accountability and acceptance

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Review questions

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Days 43-56 / Rehearse before adoption

Required work

Test permission evidence, sample payments, restore/fallback, confidential intake and claims review; resolve critical design gaps.

Required evidence

Rehearsal results and corrected version

Decision boundary: Governing body may adopt only the reviewed entity-specific version; record resolution, scope, effective date and conditions.

Accountability and acceptance

The coordinator assigns named owners and due dates in the control register. The relevant finance, territory/sector, technical and information leads produce evidence. A disinterested reviewer checks critical matters. The lawful decision owner records the outcome and permitted next scope.

Review questions

1. What changed from the approved baseline and why?

2. Which required records are absent, stale or outside the actual entity/site/activity?

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4. Do the roles, limits, data quality and resources support the proposed commitment?

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Days 57-70 / Operate only the authorised scope

Required work

Train affected people, communicate policies and execute approved controls; retain actual records and report exceptions.

Required evidence

Acknowledgements, operating records and first management review

> Decision boundary: Adoption is not proof of effectiveness; retain critical holds until verified.

Accountability and acceptance

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Review questions

1. What changed from the approved baseline and why?

2. Which required records are absent, stale or outside the actual entity/site/activity?

3. Which critical holds prevent the next activity?

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Record: scope/version | evidence IDs | reviewer | findings | conditions | proceed/revise/hold/stop | authority | next review.

Days 71-84 / Test effectiveness and correct

Required work

Sample high-risk commitments, data access and claims; challenge downside/continuity and verify remedial actions.

Required evidence

Independent sample tests, exception and correction log

> Decision boundary: No prohibited or expired exception; significant failures require a corrective owner decision.

Accountability and acceptance

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Review questions

1. What changed from the approved baseline and why?

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Days 85-100 / Approve the next cycle

Required work

Review policy coverage, operating evidence, SDG/financial materiality distinctions and resource needs; publish only reviewed status.

Required evidence

Day-100 review, residual-risk decisions and next review calendar

> Decision boundary: Proceed, revise, hold or stop; no automatic claim of full standards compliance.

Accountability and acceptance

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Review questions

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Configurable defaults / not external requirements

Proposed parameter	Working value / treatment
budgetReviewTriggerPercent	10
cashForecastWeeks	13
monthlyCloseBusinessDay	10
supplierQuoteCount	3
accessReviewMonths	3
grievanceAckBusinessDays	2
grievanceTriageBusinessDays	5
grievanceUpdateCalendarDays	15
grievanceOutcomeCalendarDays	30
incidentLogHours	24
rootCauseReviewHours	48
correctionVerifyCalendarDays	5

Critical values that must be configured

monetary delegation limits; liquidity/runway floor; sector permissions; retention/notification deadlines; recovery objectives; confidential speak-up channel; materiality and reporting boundaries. These are deliberately unset. Setting a project budget or a variance trigger does not grant a person spending authority.

Quarterly control review and corrective action

Risk-based sample

For active operations, include at least one high-risk commitment, one access/record control and one public claim, plus additional items selected for severity and prior failures. A small sample gives limited evidence and does not prove the whole system effective. For inactive controls record not yet operated with reasons; do not invent a pass.

Test field	Required entry
Design	Policy/control ID, objective, owner, frequency, expected evidence, approval and segregation.
Operation	Population/period, sample selection and size, source evidence, actual execution date and reviewer.
Result	Pass/fail/not operated with limitations, root-cause hypotheses, affected population and potential impact.
Correction	Containment, action owner/due date, fresh retest, independent acceptance and residual-risk decision.

Incident and grievance clocks

Proposed incident targets: log within 24 hours, review causes within 48 hours and verify priority correction within 5 calendar days or document a justified plan/hold. Proposed grievance targets: acknowledge in 2 business days, triage in 5, update every 15 calendar days and aim for a reasoned outcome in 30. Do not delay emergency action or mandatory notifications.

No automatic adoption

The templates and public tool always remain drafts. Actual adoption needs the competent body, entity-specific version and effective date. Actual effectiveness needs operating evidence; assurance needs its own independent scope and report.