

Support to Regional Knowledge Capacity on Economic Transformation, Resilience, and Recovery (P178045)

Updated Labour Management Procedures (LMP) – Parent Project and Additional Financing Activities

September 2023

1. OVERVIEW OF LABOUR USE ON THE PROJECT

These Labour Management Procedures (LMP) provide the framework for addressing the specific labour related risks and impacts that are associated with the implementation of the Support to Regional Knowledge Capacity on Economic Transformation, Resilience, and Recovery Project (P178045) as well as the proposed Additional Financing (P181380). The LMP sets out a formal system by which the implementing institution – African Centre for Economic Transformation (ACET) – will manage labour related risks and implement mitigation measures that will avoid or reduce the significant labour-related risks and impacts on workers.

The African Center for Economic Transformation (ACET) has requested additional financing of US\$500,000 from the World Bank to complete planned activities, including: (i) supporting ACET's role in implementing the G20 Compact with Africa; and (ii) institutional capacity strengthening of ACET. The LMP is updated to include this additional scope of activities which do not pose any anticipated additional labour risks during the project implementation period.

This LMP is consistent with the requirements of the [World Bank Environmental and Social Standards 2 \(ESS2\)](#). The scope covers aspects of the project that require the hiring of workforce to execute project activities. It is applicable to all types of project workers, defined in the ESS2 as:

- (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers);
- (b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers);
- (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and
- (d) people employed or engaged in providing community labour (community workers).

The LMP deals with all aspects relating to recruitment, labour and working conditions, remuneration, management of worker relationships, Occupational Health and Safety (OHS) as well as work-based grievance redress mechanisms.

Number of Project Workers: For the grant period 2022 to 2024 including the AF period, the project is expected to engage 55 direct workers of which 50 direct workers have been engaged. The Table below presents a breakdown of the workforce:

Categories of Project Workers

SN	Types of Project's Worker	Gender*		Total of Engaged Workers A+B	Total of Outstanding Workers C	Total (A+B) + C
		Female A	Male B			
1	Direct workers	24	26	50	5 ¹	55 ²
2	Contracted workers	1	5	6	-	6
3	Primary supply workers					
4	Community workers					-
	Total					61

*Where gender is not known, please indicate N/A

**Where government civil servants are working in connection with the project, paragraph 8 of the ESS2 will apply.

Additional details of ACET staff can be found on our [website](#). Details of national and international consultants and suppliers can be found in the project procurement plan.

Characteristics of Project Workers: ACET has a gender balanced staff, employing 24 women and 26 men. Out of the 50 employees, 16 are on an international contract and 34 are locally employed. ACET has engaged third party service providers for security, cleaning, and IT support for both the parent Project and will continue to provide services under the AF. These workers consist of 5 males and a female.

Child Labour and Minimum Age: A child under the minimum age established in accordance with ILO standard has not been and will not be employed or engaged in connection with the project. All ACET staff are over 18 years and shall comply with the provisions stipulated under paragraphs 17, 18 and 19 of ESS2.

Nondiscrimination and equal opportunity: ACET provide equal opportunities to everyone without discrimination and ensures workforce diversity. Out of the 50 staff currently engaged by ACET, 24 of them are females representing almost 49% of the direct workforce. ACET strives for gender parity in its

¹ They are not yet engaged thus gender unknown.

² Direct workers can be categorized as follows:

- ACET staff members, including both front and back-office positions.
- Consultants, primarily experts engaged as consultants undertaking research.

recruitment processes and complies with the provisions stipulated under paragraphs 13, 14 and 15 of ESS2.

Timing of Labour Requirements: ACET staff are already in place and are engaged for various project activities implementation as and when required. ACET staff are primarily located in Accra, Ghana, although some staff work remotely from e.g., the US, the UK, Ethiopia, South Africa, and the Ivory Coast. All employees, consultants and suppliers are covered by this LMP regardless of their location.

The Consultants and Suppliers are engaged based on the requirements of the various projects as and when needed as detailed in the annual Procurement Plans. Community workers have not been involved and will not be involved in the AF project activities. Consultants are engaged per the World Bank Procurement Guidelines.

2. ASSESSMENT OF KEY LABOUR RISKS

2.1 Project Activities

Project components, subcomponents, and activities are described below.

Component 1 – Amplifying the knowledge base and policy design for economic transformation

Component 1 supports ACET's flagship programs and ongoing analysis, advisory, advocacy, and partnership programs for economic transformation in alignment with the ACET 2020-2024 Strategy, including technical support to activities continuing from TAP1 to TAP2.

Analytical activities include the development of the 4th African Transformation Report (ATR) on gender and economic transformation, the African Transformation Index, and hosting of the African Transformation Forum. Advisory work supports national governments, on a demand basis, through peer learning and technical advice to support economic transformation. Advocacy activities focus on galvanizing action through outreach, dissemination, and convening through modalities such as the African Transformation Forum and Transformation Leadership Panel.

A key thematic area for this support has been Climate Change and the role of economic transformation. ACET's second and third African Transformation Reports includes analysis of climate change impacts on agriculture and climate change impacts on trade and transformation respectively. As part of the ATR advocacy follow-up process, ACET co-hosted a virtual learning event on climate in December 2021 with NEPAD and has been in discussion with partner governments about pathways for implementing some of the reports' key recommendations.

Under the TAP2, as part of supporting the design of policies and their implementation, ACET has worked with the Government of Ghana (GoG) to provide advisory support for the GoG led "Compact for Ghana initiative" (the Compact). ACET has convened a broad coalition of policy institutes, civil society organizations, private sector partners, media, and youth influencers to help develop and build a consensus on the "Ghana We Want" as part of this initiative. ACET collaborated with seven of the leading Ghanaian policy institutes (ISSER, IDEG, Afrobarometer, IMANI, CDD, IEA, media houses, civil society organizations) to draft eight technical papers on Ghana's economic transformation including the fiscal responsibility,

planning, gender equity; youth education and skills; health; private sector development; and climate change.

Component 2 – Supporting regional and domestic knowledge capacity for COVID-19 recovery and resilience

Component 2 provides country-specific support, largely on a demand basis, to support economy recovery and resilience for COVID-19. Key activities include supporting CwA and the compact countries with learning support.

Subcomponent 2.1 Supporting ACET's role in implementing the G20 Compact with Africa

In this subcomponent, ACET continues supporting the implementation of CwA programs centering around five areas: (1) providing independent peer reviews of the CwA; (2) curating peer-to-peer learning opportunities for member countries; (3) enhancing Investment Promotion activities/capacities within CwA countries; and (4) advocacy for the CWA Program; and (5) engaging country compact teams and advisory panel.

In 2022, ACET initiated a side event at the AfDB Annual Meetings to engage African Finance Ministers on the opportunities provided by the Compact and how it can be better utilized for investment promotion. Annually from 2023 onward, ACET will facilitate a side event at the African Development Bank Africa Investment Forum.

The activities supporting implementation of the G20 Compact with Africa (CwA) including peer-to-peer learning events on relevant topics, analysis, and peer reviews as well as consultations, workshops, and research are on track. ACET has conducted three peer-to-peer learning events in the current fiscal year and others are lined up.

Under this AF, ACET intends to continue with peer reviews of CwA up to 2024 to be informed by key topics addressed by the G20 Africa Advisory Group and Compact Country needs by supporting focal points for coordination of Compact Meetings in 12 countries.

Other additional activities to be supported under this AF include enhancing investment promotion through a range of activities to engage African finance ministers on the opportunities provided by CwA and facilitate networking between countries and the private sector.

The project's CwA-related activities are designed with a view of ACET possibly playing a more substantial role in CwA program coordination and administration with availability of funding for these activities. Compact Countries have indicated that more support is needed and thus, ACET's implementation support to CwA work area require expansion with additional funding through CwA.

Subcomponent 2.2 — Think Africa Partnership COVID-19 Emergency Response and Recovery Program

This subcomponent supports African governments to make strong economic rebound from the COVID-19 pandemic. The TAP2 funded Covid-19 Recovery and Resilience program is being implemented through in-depth Country Economic Transformation Outlook (CETO), a new analytical product that ACET initiated in

2022. Its purpose is to focus African economic management on strategies and policies to steer the continent on a path of structural change and economic transformation to promote resilience as the economies rebound from the COVID-19 pandemic.

The development of the CETO includes two sets of activities. The first is providing research, analysis, and on-demand support to governments and institutions in designing and implementing national COVID-19 economic recovery strategies. The CETO analysis projects in-country analyses by applying the growth with DEPTH framework and seeking to influence policy debate and to shape development agendas in line with its approach. The second is creation of partnerships with think-tanks and government institutions given that the CETO has been undertaken in partnership with country-based economic policy think tanks and in close consultation with other government and non-government stakeholders. The COVID-19 Response Fellowship (see Component 3.2 below) supports countries in implementing the CETO recommendations.

Subcomponent 2.3 – Support to Private Sector Development

Sub-component 2.3. will continue and scale a partnership approach to private sector development. TAP 1 supported ACET in piloting a Special Export Processing Zone-Export Processing Zone (SEPZ-EPZ) implementation support program and the ACET Business Transform Program (ABT) in Ghana. TAP2 will continue and expand the support under these two programs. For the SEPZ-EPZ implementation support program, the findings of the 2020 SEPZ – EPZ Landscape Assessment and Benchmarking study in Ghana and subsequent validation will be taken forward to inform the Ghana Free Zones Authority's (GFZA) review of the Free Zones Act and Regulations through policy advice and recommendations. The ABT is a local content SME Program for Early and Growth Stage Small and Medium Enterprises (SMEs) with the potential to integrate into global value chains particularly in extractives, agro-processing, light manufacturing, and service industries.

In TAP2, at the request of the Rwandan government, the ABT TAP2 expanded activities to Rwanda and will subsequently expand to Liberia to continue outreach and sensitization efforts for-SMEs, with the goal of increasing their readiness and participation in ACET's private sector development program.

In Ghana, ACET provided 10 selected SMEs with top tier technical and managerial assistance, mentorship, coaching, financial support and transaction advisory services, with the primary objectives of making them investment ready and integrating them into the global value chains.

In this subcomponent, ACET also provides support to requesting governments to align their policies and regulations to the African Continental Free Trade Agreement (AfCFTA) protocols to maximize potential gains while minimizing risks. Support examines the cost and benefits of liberalization as well as building the capacity of local industry especially SMEs to enable their integration into the value chains of regional and global players. The scope of work under this activity covers trade in goods (both trade policy and trade facilitation), regulatory measures such as sanitary and phytosanitary standards, non- tariff barriers and technical barriers to trade and trade in services.

Component 3 – Building the bridge to policy impact through Fellowship Programs

Under this Component, the TAP2 project supports two Fellowship Programs: the Chief Economists of Government Initiative's (CEoG) Presidential Fellowship Program and the ACET Transformation Fellow Program on Covid-19 Response.

ACET has hired an in-house program manager to oversee the Fellows programs. Each fellow has a mentor, access to technical and leadership training, and exposure to networks of African and global leaders.

An ACET Transformation Fellow is currently based at the Ministry of Finance in Ghana and is supporting the Ministry on various policies, including work on digital taxation policies. ACET plans to work on forging partnerships with other regional think tanks who could potentially host subsequent fellows.

Component 4: Administrative and Institutional Capacity Support

This component supports the Project Implementation Unit's execution of its core functions including project management/coordination and fiduciary oversight as well as activities designed to build the institutional capacity of ACET itself. Component 4 is primarily implemented in Accra, Ghana, the location of ACET's HQ. Depending on the nature of the administrative and implementation support, ACET staff work remotely from the US and the UK exclusively on a virtual basis.

Subcomponent 4.1. Institutional Capacity Strengthening

Under this subcomponent, ACET continues to strengthen its institutional capacity in alignment with advances made under the support from TAP1.

- (a) The following new activities will support ACET's institutional capacity building under the additional financing:
 - (i) Training and capacity building of ACET staff: Purchase of communications equipment and peripherals to reinforce ACET's communications capability.
 - (ii) Purchase of IT equipment and peripherals to enhance IT development and security.

Key areas of focus for institutional strengthening include communications and marketing, procurement, technical capacity of fellows, staff, consultants, and development of expert networks to support our work. It also supports project implementation, monitoring, evaluation, and learning, as well as an institution-wide digital transformation strategy to include new hardware and software and tools for virtual work. The subcomponent has supported ACET to develop the functionality and capacity to enhance its online platforms and presences, as well as partnership building for policy dialogue. Lastly, the subcomponent also supported vehicle acquisition.

ACET has also developed a training program for the various participating staff which ensured the aim of increasing overall gender equity in the representation of staff trained. The training activities are primarily to be undertaken in Accra, Ghana, the location of ACET's HQ. These trainings are expected to be provided on a virtual basis.

Subcomponent 4.2. Administrative and Implementation Support

This component facilitates the management and coordination of project implementation. This component finances the core administrative functions required for coordinating the activities under the project. The ACET management team carries out project implementation, procurement, financial management (FM) and Monitoring and Evaluation (M&E) and produces regular progress reports as required by their governing body. This subcomponent finances the staff required to carry out the activities under the project, office equipment, operational costs, as well as an annual audit and independent performance review of the project.

This subcomponent also finances the services of an Environment and Social Specialist on a part-time basis who is committed to the environment and social safeguards management activities for both the parent project and AF. The project has activated its Grievance Mechanism (GM), disclosed it on their website and has contracted a service provider to support handling of grievances. So far, the project has recorded one grievance through an email (GRM@acetforafrica.org) which was investigated and closed. The Code of Conduct (CoC) for staff and consultants has been updated, to include amongst others, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). ACET has reviewed and updated its Occupational Health and Safety Policy and Environmental Policy and has prepared a screening form which has been used to screen activities of nine (9) beneficiary small and medium enterprises (SMEs) under the ABT technical assistance program. Contracts for project beneficiaries, among others, include the requirements of CoC and Labour Management Procedures (LMP).

The technical support including the prevention of SEA/SH by the part-time Environment and Social Specialist for the project is also financed under this sub-component.

Location

Country selection for TAP2 activities occurs in accordance with a two-pronged framework which considers the nature of the activities, associated partnerships, and/or other structural frameworks. The first prong applies to ACET's global knowledge products and events wherein the follow-on support is oriented towards ACET's institutional priority countries named in ACET's Strategy 2020-2025: Tunisia, Ghana, Uganda, Senegal, Zambia, and Côte d'Ivoire. The second prong is for ACET's activities that are conducted primarily on a demand basis, countries are determined on a rolling basis following consultation with ACET to determine their readiness, objectives, availability of ACET and government resources, logistical and market considerations, as well as environmental and social risks which are discussed in concert with World Bank E&S Specialists. The private sector development support in Component 2.3 focuses on Ghana and Rwanda and further discussions for extension to Liberia are ongoing. The country selection process for the COVID-19 response and recovery support in Component 3.1 was based on three criteria. The countries should be part of the institutional priority countries included in ACET strategy 2020-2025. The countries should be part of the Covid-19 priority countries identified by ACET in previous research streams. The countries should be part of the African Transformation Index priority country list.

2.2. Key Labour Risks

The Project will largely continue to focus on analysis, advisory, advocacy and partnership programs for economic transformation. No civil work or provision of physical infrastructure will be carried out under this project. The additional financing is earmarked for further project support for focal points for coordination of Compact with Africa Meetings engagement with African Finance Ministers on enhancing investment promotions and ACET institutional capacity building (human resource and communication

team trainings). ACET staff, consultants, and suppliers do not engage in any type of hazardous work. As a result, the labour risks rating associated with the project is maintained at low to moderate and are summarized in the table below.

S/N	Risks and Impacts	Degree of impact	Justification for the rating
1.	Possible accidents and emergencies through transportation and use of vehicles for project activities	Low	Frequent transportation is not carried out as the project mostly utilizes virtual meetings. Only qualified drivers are employed by ACET. ACET continues to have zero vehicular accident records.
2.	Potential Gender-Based Violence (GBV)	Low	ACET's HR Policy strongly prohibits GBV. The Project continues to have limited interaction with vulnerable communities including women and girls.
3.	Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)	Moderate	Potential Gender-based risks were identified at two levels. The first is the unequal access to benefits and opportunities of the project. The second is sexual harassment, sexual assault, or verbal harassment on women who are part of the capacity building/fellowships programs and as project workers.
4.	Risk of contracting COVID-19	Low	The risk is downgraded from Moderate to low as a result of the reduction of COVID-19 cases worldwide and the immunization of staff against the disease. Additionally, COVID-19 cases in Ghana do no longer pose health risks. Project workers have always observed the necessary COVID-19 safety protocols during the peak of the pandemic in Ghana.

GBV, SEA/SH

The nature of ACET's work continues to put the institution at a moderate risk of Gender Based Violence (GBV) and Sexual Exploitation Abuse and Sexual Harassment (SEA/SH). The identified risks are the following:

- 1. Risks of SEA and SH committed against staff members, consultants, or others related to the project (particularly women and girls)** - by all project personnel (employees, subcontractors, suppliers, associates, consultants) or others associated with the execution of project activities.

2. **SEA and SH risks related to the non-compliance with the Code of Conduct** for all project personnel (employee, subcontractor, supplier, partner, consultants) which guarantee a safe and respectful work environment for staff, and which prohibit and sanction SEA and SH.
3. **Risk of SEA and/or SH committed against fellows in host government**, exacerbated by the remote supervision of fellows.

ACET has an updated code of conduct and continues to implement its SEA/SH action plan to mitigate these risks, please see the updated Code of Conduct in Annex 1 and the SEA/SH Action Plan in Annex 2.

Occupational Health and Safety (OHS)

ACET's Staff Handbook includes sections on Health, Safety and Security that addresses the occupational health and safety requirements of the institution. In addition, ACET has an updated Occupational Health and Safety Policy, see Annex 3. All staff are trained on the OHS policy and it continues to be a standardized element during the onboarding of new staff members.

Mitigations for the identified labour risks

The project continues to closely monitor its identified labour risks associated with the implementation of project activities to avoid escalation. The table below provides mitigations measures being implemented against the identified risks.

No.	Labour Risk	Mitigation Measures
1.	Occupational risks and hazards (incidents and accidents)	<ul style="list-style-type: none"> • Ensure full compliance with the ACET updated OHS Management plan • Provision of regular OHS training to staff • Office vehicles must always be driven by qualified drivers.
2.	Risk of Contracting COVID-19	<ul style="list-style-type: none"> • Continue to raise awareness on COVID-19 best practices among workers • Continue to enforce relevant COVID-19 protocols at workplace, if necessary. • Utilize virtual meetings or non-contact channels for meetings and workshop, if necessary • Continue to provide necessary handwashing and sanitizing facilities
3.	Risk of GBV, SEA/SH	<ul style="list-style-type: none"> • Ensure all workers sign and be guided by the updated Code of Conduct prohibiting SEA/SH • Continue to implement the SEA/SH sensitive Grievance Response Mechanism (GRM) • Accountability and Response Framework guiding GRM and HR policy <p>Accountability:</p>

No.	Labour Risk	Mitigation Measures
		<ul style="list-style-type: none"> ▪ Dissemination, training and signing of updated Code of Conduct for all project staff, which includes at least the following elements: <ul style="list-style-type: none"> ▪ Prohibited behaviour ▪ List of penalties ▪ Minimum standards and appropriate business conduct ▪ Responses to online violence ▪ Reporting obligations and complaint collection mechanism specifying the roles and responsibilities in the handling of complaints. <p>Response:</p> <ul style="list-style-type: none"> ▪ Establishment of the SEA/SH sensitive complaint management mechanism, which includes at least the following elements: <ul style="list-style-type: none"> ✓ Specific procedures for dealing with complaints related to SEA/SH, including the deadline and possible sanctions ✓ Procedures for reporting complaints related to SEA/SH, including avenues accessible to targeted communities (including vulnerable groups) and project staff ✓ Adoption of a Protocol for response and follow-up of allegations of cases of GBV, SEA and SH including modalities for the safe and confidential referral of reported cases to the appropriate services. ▪ Created awareness of availability of ACET's therapist/councilors and development of a roster of online therapists/councilors. <p>Training and awareness plan, including:</p> <ul style="list-style-type: none"> ▪ Capacity building for project staff regarding SEA/SH risks, including updated code of conduct and SEA/SH complaint mechanism. This is provided to all existing staff as well as to new employees as part of their on-boarding process. ▪ Communication regarding HR policies on SEA/SH and where complaints can be made.

3. BRIEF OVERVIEW OF LABOUR LEGISLATION: TERMS AND CONDITIONS

All ACET's staff, consultants, and suppliers are contracted under Ghana labour Law³. The host country's laws are applicable under the Transformation Fellows program. The LMP will continue to be periodically updated to capture any revision of host countries' applicable legal provision under Transformation Fellowship program.

Minimum wages: ACET offers competitive salaries that are above the minimum wage.

Deductions: ACET complies with the Ghana Labour Law with respect to deductions from staff remuneration (*Reference Ghana Labour Act 651, Section 69 2b*).

Benefits: The Ghana Labour Law does not have any specific provisions with regards to benefits for staff, ACET offers a Tier 3 Pension to its staff. Ghana's 3-Tier pension scheme structure under Act 766 is a best-of-breed system combining a mandatory government led solidarity fund as Tier-1, a private sector led investment fund as Tier-2 and laced with a supplementary individual led voluntary top up as Tier-3. Tier-3 is a voluntary provident fund and personal pension scheme. It is supported by tax benefits to provide additional funds for workers who want to make voluntary contributions to enhance their pension benefits.

4. BRIEF OVERVIEW OF LABOUR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

ACET complies with the Ghana Labour Law with respect to Occupational Health, Safety and Environment (Reference Ghana Labour Act 651, Part 15 page 118 -121, see link in footnote 2). ACET will continue to review the labour/OHS legislation of partner countries and update this LMP whenever necessary.

ACET also complies with the requirements of the World Bank's Standard on Labour and Working Conditions (ESS2) which incorporates the necessary international best practices such as those of International Labour Organisation (ILO).

5. RESPONSIBLE STAFF

This section identifies the functions and/or individuals within the project responsible for (as relevant):

Function	Position/individual responsible
<i>Engagement and management of project workers</i>	The ACET Management Committee, Project Leads in conjunction with the Human Resources and Procurement Units of ACET.

³ Ghana Labour ACT 651, 2003 <https://www.ilo.org/legacy/english/inwork/cb-policy-guide/ghanalabouract2003section109.pdf>

Updates and amendments to ACT 651

[http://oit.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=66955&p_count=99097&p_classification=01&p_classcount=12943#:~:text=Name%3A-,Labour%20Act%2C%202003%20\(Act%20No.,651\).&text=Part%20III%3A%20Protection%20of%20employment,grounds%20for%20termination%2C%20etc.\)&text=Part%20V%3A%20Employment%20of%20persons,disablement%2C%20training%2C%20etc.\)](http://oit.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=66955&p_count=99097&p_classification=01&p_classcount=12943#:~:text=Name%3A-,Labour%20Act%2C%202003%20(Act%20No.,651).&text=Part%20III%3A%20Protection%20of%20employment,grounds%20for%20termination%2C%20etc.)&text=Part%20V%3A%20Employment%20of%20persons,disablement%2C%20training%2C%20etc.))

<i>Occupational health and safety (OHS)</i>	<p>The ACET Management Committee through the Human Resources Unit.</p> <p>E&S Specialist supported the OHS policy updates.</p>
<i>Training of workers</i>	<p>Human resources provide training in relation to ACET's staff and labour policies.</p> <p>E&S Specialist provides training on E&S provisions.</p>
<i>Addressing worker grievances</i>	<p>The ACET Management Committee through the Human Resources Unit receives and manages complaints. ACET has in place a Whistle-blower policy to handle grievances.</p>

6. POLICIES AND PROCEDURES

ACET complies with the Ghana Labour Law with respect to Occupational Health, Safety and Environment (Reference Ghana Labour Act 651, Part 15 as well as the objectives and requirements of ESS2).

Per ACET policy, workplace accidents are to be reported to the Chief Operating Officer and/or Human Resources Manager who are charged to regularly review health and safety concerns to eliminate potential health or safety problems.

No risk of forced labor or child labor has been identified under this project.

7. AGE OF EMPLOYMENT

This section sets out details regarding:

- *The minimum age for employment on the project*

The minimum age for employment on this project is 18 years as per ILO Regulations and Ghana Labour Law.

- *The due processes are always followed to verify the age of project workers*

ACET insists on proof of identity as part of its employment procedures and medical clearance for employees are also obtained where necessary.

- *The procedures to be followed to deal with the unlikely event of discovery of underage workers:*

ACET will not knowingly employ an underage worker, should one be found that employment relationship will be terminated immediately.

- The procedure for conducting risk assessments for workers aged between the minimum age and 18.

As stated above, ACET insists on proof of identity as part of its employment procedures and where necessary, obtains medical clearance for employees.

8. TERMS AND CONDITIONS

This section sets out details regarding:

- **Terms and conditions of employment:** Project workers hired by ACET are covered by paragraphs 10, 11, and 12 of the ESS2.
- *Specific wages, hours and other provisions that apply to the project*

Competitive wages, in line with local labour legislation. Negotiated with consultant but project dependent.

- *Maximum number of hours that can be worked on the project*

Full-time, 40 hours a week.

- *Any collective agreements that apply to the project.*

ACET currently has no collective bargaining agreement.

- *Other specific terms and conditions*

All other policies, e.g., sick, and annual leave, ACET follows national labour law.

9. GRIEVANCE REDRESS MECHANISM (GRM)

The GRM covers any issue or concern that ACET staff and consultants, program beneficiaries, fellows or prospective fellows, affected people or interested parties may have and offers a way to bring these issues safely and securely to the project management's attention.

In order to ensure that ACET can offer full confidentiality and anonymity of the complainant, ACET has engaged a specialized managed contact center (Tel: +233242436922, email: acetgrm@delaphonegh.com). The contact center provides a full-time (40 hours/week) manned phone, email, and text service, where received complaints are transcribed and subsequently shared with ACET's HR department. The contact center manages all contact and communication with the complainant, ensuring full anonymity if necessary. In addition, complainant can also reach ACET by letter or through telephone or mail (Tel: +233 24 243 6858, or email: GRM@acetforafrica.org) or personal visits to the office. ACET's administrative staff are trained in how to handle such correspondence with sensitivity and direct complainants to the appropriate staff member in the Human Resources department. A comprehensive overview of ACET's internal GRM procedures can be found in Annex 4.

GRM related information are available on ACET's website and communicated periodically to stakeholders and potentially affected parties to remind them of the redress channels. The website information sets out the length of time users can expect to wait for acknowledgment, response, and resolution of their grievances (see annex 4).

The grievance mechanism for the project is designed and adapted to allow for the uptake and appropriate handling of SEA/SH allegations, further explained in the SEA/SH action plan in Annex 2. As part of this process, ACET's current complaint and redress system is in compliance with World Bank and global best practices and provides stronger support for complainants. ACET has specific procedures for dealing with complaints related to SEA/SH, including the deadlines and possible sanctions. Procedures respect confidentiality and provide multiple channels for reporting complaints related to SEA/SH, including avenues accessible to project participants (including vulnerable groups) and project staff. These include online/phone mechanisms; and obligations concerning the guiding principles for the ethical and confidential treatment of this type of complaint. ACET has a GRM manual detailing complaints handling procedures following a survivor centered approach.

ACET's Sexual Harassment and non-discrimination policies are integrated into the employee handbook and onboarding materials and training, and staff are given periodic trainings/ updates during monthly staff meetings to ensure that they are fully briefed on both the standards of conduct expected by ACET's staff and consultants as well as the redress mechanisms for breaches of such policies and codes.

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

10. PRIMARY SUPPLY WORKERS

No risk of child or forced labor has been identified under this Project. ACET suppliers are not known to be engaged in high-risk areas. During the implementation of the parent project, ACET has procured the following:

- Computers and IT equipment
- Furniture and remodeling of office space
- 1 vehicle

Annex 1: ACET Updated Code of Conduct/ Business Ethics

ACET Code of Conduct (CoC) defines the key responsibilities of all ACET Staff, Consultants and service providers in respect of the welfare and rights of the people with whom they work. It is aimed to assist staff in clearly understanding the obligations placed upon their conduct, as to prevent the following: unethical business practices, fraud and corruption, Sexual Exploitation and Abuse and all forms of harassment. In this regard, all ACET Staff, Consultants and service providers shall at all times:

- perform your duties with honesty, integrity and promote and enhance the image of ACET
- treat all persons with courtesy, impartiality, fairness and equality, and you have the right to be treated with courtesy, respect and dignity
- act professionally; unprofessional behavior such as sexual harassment, general harassment, abuse of power, or discrimination will not be tolerated
- exercise discretion in regard to all matters of official business
- provide timely and professional cooperation to co-workers, and you should expect the same from them
- deal with ACET clients, partners and donors with utmost responsibility and professionalism and in accordance with ACET relevant policies and rules
- safeguard ACET property and intellectual property rights in a prudent manner and in accordance with relevant policies
- decline any gift or favour and do not provide gifts or favours to clients, partners, government officials or any person/s associated with organizations that could become potential clients or partners
- avoid holding any paid jobs outside ACET without prior written approval of the President
- ensure that you do not abuse the privilege and immunities granted you in accordance with the agreement between ACET and the Government of the host country(ies) to which you are assigned.

If you breach the Code of Conduct, you are liable to disciplinary action, including the possibility of dismissal.

As an ACET team member, you should at all times act in the best interests of ACET in the discharge of your responsibilities. You are expected to carry out your duties consistent with the interests and to the credit of ACET. This means that you should declare to your Supervisor any potential conflict of interest in your dealings with other parties, ensuring that any activities you engage in are not incompatible with the work you do for ACET.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

Definition

ACET management and staff have adopted the U.N. Secretary-General's definition of protection from sexual exploitation and abuse as follows:

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- **Sexual Abuse:** Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual Harassment:** Any unwanted sexual advance, request for sexual favour, verbal, or physical conduct of a sexual nature.

Note: Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Not knowing or mistaking the age of a child is not a defense.

We at ACET recognize that based on the work we do, Sexual Exploitation and Abuse and Sexual Harassment can occur. As such, all ACET team members including service providers are committed to abiding by the following six core principles on Sexual Exploitation and Abuse, adopted by the United Nations Inter-Agency Standing Committee Task Force on Prevention and Response to Sexual Exploitation and Abuse:

1. Sexual Exploitation and Abuse by ACET and its representatives constitute acts of gross misconduct and are therefore grounds for disciplinary actions and/or termination of an employment contract within the applicable and current regulations.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense and in no way shall ignorance of the age of the person be accepted as a justification.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes an exchange for assistance that is due to community members.
4. Sexual relationships between ACET staff and members of the community are strongly prohibited since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work.
5. When ACET and its representatives develop concerns or suspicions regarding sexual abuse by an individual, whether the individual works for ACET or other organizations, partners, suppliers or other related stakeholders, they are mandated by a legal and moral duty of care. They must report such concerns through the means and tools available within ACET's reporting mechanisms (the grievance redress mechanism). The ACET management must be informed about all the concerns and suspicions, including rumours, in good faith, regarding SEA/SH.
6. All ACET and its representatives are obliged to create and maintain an environment that prevents SEA/SH and promotes the implementation of the Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

Raising Concerns

If any person observes behaviours that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either to the HR Manager or through ACET's GRM channels.

Annex 2: ACET GBV/SEA/SH Action Plan

Projects	Project-Related SEA/SH Risk	Risk Mitigation Measures	Responsible	Timeline	Budget/Source
ACET core operations	<p>1. Risks of SEA and SH committed against staff members, consultants, or others related to the project (particularly women and girls) - by all project personnel (employees, subcontractors, suppliers, associates, consultants) or others associated with the execution of project activities.</p> <p>2. SEA and SH risks related to non-compliance with the Code of Conduct for all project personnel (employee, subcontractor, supplier, partner, consultants) which guarantee a safe and respectful work environment for staff, and which prohibit and sanction SEA and SH.</p>	<p>Accountability and Response plan, including:</p> <p>Accountability:</p> <ul style="list-style-type: none"> ▪ Dissemination, training and signing of Code of Conduct for all project staff, which includes at least the following elements: <ul style="list-style-type: none"> ○ Prohibited behaviour ○ List of penalties ○ Minimum standards and appropriate business conduct ○ Responses to online violence ○ Reporting obligations and complaint collection mechanism specifying the roles and responsibilities in the handling of complaints. <p>Response:</p> <ul style="list-style-type: none"> ▪ Establishment of the SEA/SH sensitive complaint management mechanism, which includes at least the following elements: ▪ Specific procedures for dealing with complaints related to SEA/SH, including the deadline and possible sanctions ▪ Procedures for reporting complaints related to SEA/SH, including avenues accessible to targeted communities 	<p>ACET Management</p> <p>Human Resources</p>	Implemented during project period.	TAP 2 Component 4

Projects	Project-Related SEA/SH Risk	Risk Mitigation Measures	Responsible	Timeline	Budget/Source
		<p>(including vulnerable groups) and project staff</p> <ul style="list-style-type: none"> Adoption of a Protocol for response and follow-up of allegations of cases of GBV, SEA and SH including modalities for the safe and confidential referral of reported cases to the appropriate services. Creation awareness of availability of ACET's therapist/councilors and development of a roster of online therapists/councilors. <p>B. Training and awareness plan, including:</p> <ul style="list-style-type: none"> Capacity building for project staff regarding SEA/SH risks, including code of conduct and SEA/SH complaint mechanism. This is being provided to all existing staff as well as to new employees as part of their on-boarding process. Communication regarding HR policies on SEAH and where complaints can be made. 			
ACET core operations	<p>I. Risks related to the lack of access of female beneficiaries to project benefits and services (e.g., low female engagement in panels, fewer female applicants for consultancies and vacancies)</p>	<ul style="list-style-type: none"> An equal access analysis annexed to ACET's recruitment strategy. An equal access analysis annexed to ACET's Communication Strategy. 	<p>ACET Human Resources</p> <p>ACET communication teams</p> <p>ACET Management</p>	<p>Developed and implemented under the TAP 2.</p> <p>Implemented throughout project period.</p>	<p>USD2000 (staff costs)</p> <p>TAP 2 Component 4</p>

Projects	Project-Related SEA/SH Risk	Risk Mitigation Measures	Responsible	Timeline	Budget/Source
	<p>2. Risks related to the lack of information for female beneficiaries about the project and the associated risks due to the lack of consultations with female beneficiaries (upstream of projects as well as during their implementation) in safe and secure conditions. Confidential</p> <p>3. Risks related to difficulties in accessing information for community outside the internet grid. Risks of low accessibility in terms of disabilities and language.</p>				
ACET Transformation Fellows	<p>1. Risk related to lack of access for female candidates to fellowship positions.</p> <p>2. Risk of SEA and/or SH committed against fellows in host government, exacerbated by the remote supervision of fellows.</p>	<p>1. Transformation Fellows program will continue to apply recruitment, selection, and allocation approaches cognizant of the specific barriers that might face female fellows.</p> <p>2. For GBV risks, the principles and approached laid out in the accountability and response plan above applies.</p>	<p>ACET Transformation Fellows Team</p> <p>ACET Human Resources</p> <p>ACET Management</p>	<p>Developed as part of the CEoG and CETO Fellowships.</p> <p>Implemented during project period.</p>	<p>USD10,000 (Consultancy fee, staff costs, production)</p> <p>TAP 2 Component 3</p>

Annex 3: Updated ACET Occupational Health & Safety Policy

It is the policy of the African Centre for Economic Transformation (ACET) to provide at all times safe and healthy working environment (as far as is reasonably practicable) for all its staff and visitors to its premises. ACET also believes that a well-managed health and safety program is an integral part of good management practice to achieve the best possible health and safety standards and intends to:

- Encourage persons on the premises to co-operate with the Organisation in all safety matters, in the identification of hazards which may exist and in the reporting of any condition which may appear dangerous or unsatisfactory;
- Provide sufficient information, instruction, training and supervision to enable everyone to avoid hazards and contribute to their safety and health;
- Provide specific information, instruction, training and supervision to personnel who have particular health and safety responsibilities;
- Make, as reasonably practicable, safe arrangements for protection against any risk to the health and safety of the general public or other persons that may arise from ACET's activities;
- Comply with all relevant statutory requirements.

All ACET Staff, Consultants, beneficiaries, visitors, and service providers share responsibility for a safe and healthy work environment.

Scope

This policy contains general rules and guidelines for all staff, consultants, board members, partners and suppliers and will be revised as often as appropriate.

ACET Health and Safety Rules and Guidelines

All workers must exercise ordinary care to avoid accidents in their activities at work and comply with the following general rules and with any further rules which ACET Management may publish from time to time.

Accident Forms and Book

Any injury suffered by a worker or visitor in the course of employment or otherwise on ACET's premises, however slight, must be recorded, together with such other particulars as are required by statutory regulations, in an accident book maintained at the reception.

Fire Precautions

All personnel must familiarise themselves with fire escape routes and procedures and follow the directions concerning fire.

Equipment and Appliances

No equipment or appliance may be used other than as provided by or specifically authorised by or on behalf of ACET and any directions for the use of such must be followed precisely.

Safety Clearways

Corridors and doorways must be kept free of obstructions and properly lit.

Maintenance

Defective equipment, furniture and structures must be reported as such without delay.

First Aid

There is a first aid kit at the front desk.

Fire

In the event of a fire or fire alarm, all staff should assemble at the designated Assembly Point.

Smoking

Smoking is not permitted anywhere in the ACET premises or vehicles - this is a non-smoking organisation.

Alcohol and Drugs

The use of alcohol and drugs is not allowed on the premises. Drinking of alcohol will only be permitted during staff functions. Any member of staff found to be indulging in the above on the premises will face disciplinary action up to and including dismissal.

Working from Home

Employees may agree on flexible work arrangements with their supervisors, which can include working from home. An employee working from home is personally responsible for ensuring the home working environment is compliant and fit for purpose.

Hygiene and Waste Disposal

Facilities for the disposal of waste materials must be kept in a clean and hygienic condition. Waste must be disposed of in an appropriate manner and in accordance with any special instructions relating to the material concerned.

Display Screen Equipment

ACET recognises its responsibility to ensure the well-being of workers who habitually use display screen equipment for a significant part of their normal work. Workers are advised to ensure that they take a five-minute break from the display screen equipment at least once an hour.

Bomb Warnings

If you receive a warning try to find out from the caller:

- The approximate location of the bomb and likely time of detonation;

- Whether the police and fire brigade have been notified;
- Try to RECORD EXACTLY WHAT IS SAID:

Notify the Police immediately on 191;

DO NOT SOUND THE FIRE ALARM but evacuate the building taking into consideration any information from the bomb warning;

Reporting

Staff are to report any health and workplace concerns and incidents to the HR Manager for redress. Staff are required to report violations of this policy to their manager, HR Manager or through ACET's whistleblower mechanism.

Annex 4: ACET Grievance Redress Mechanism

Grievance Redress Roles and Responsibilities

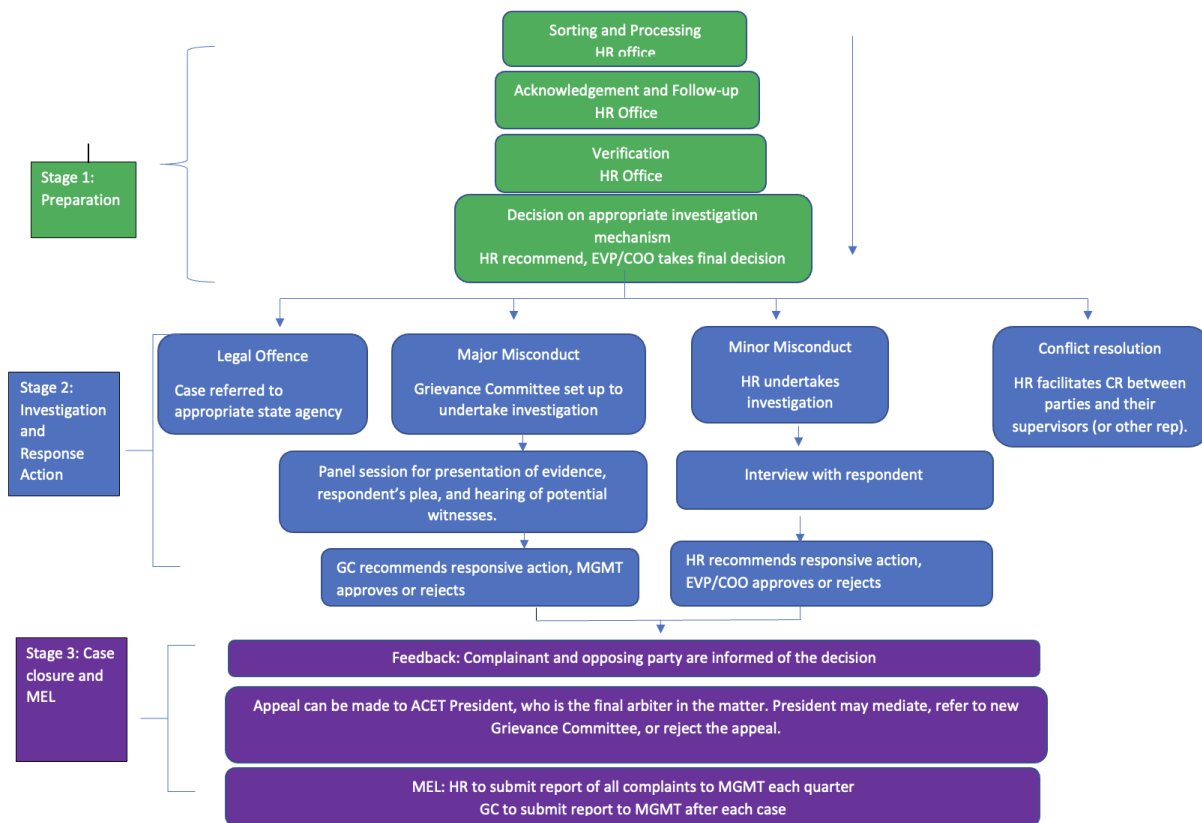
The procedures presented below assigns specific roles and responsibilities to various members of ACET staff. In the case where a complaint is directed towards a staff member with GRM responsibilities, they will be recused of their assigned role and replaced by another member of the ACET organization. The table below list the participating parties, and who will replace them in case they are the object of a complaint.

GRM implementing staff members	Replacement in case of a complaint/conflict of interest
Human Resource (HR) Coordinator	HR Manager
HR Manager	Executive Vice President (EVP) /Chief Operating Officer (COO)
HR Office (Coordinator & Manager)	EVP/COO
EVP	COO or ACET President
COO	EVP or ACET President
EVP & COO	ACET President
ACET President	ACET Board of Directors
ACET Board of Directors	ACET President and/or EVP

Additionally, ACET may seek the advice of its legal counsel as needed at any point within the GRM process. The decision to do so will be taken by the EVP/COO, or alternatively the President in case of conflict of interest.

Ultimately, the Board of Director is the governing body of ACET and has the ultimate authority and responsibility for managing the Organization's affairs.

ACET Grievance Redress Processes Figure



Grievance Redress Processes

Stage 1: Preparation

Sorting and Processing

The HR coordinator is responsible for sorting the grievances received either through the anonymous platform or through the direct complaint process. They are responsible for documenting and registering the grievances in the ACET grievance register. The HR Office shall be the only office with access to this information, which shall be treated with the highest level of confidentiality and in line with the [Data Protection Act of Ghana](#) and the [Ghana Whistleblower Act 720](#). As noted above, if the complaints are towards the HR office, the process will instead be led by the EVP or COO. A special archive will be created for these cases with access granted exclusively to the COO and EVP.

Acknowledgement/ Follow-up

The HR office shall acknowledge receipt of any grievance complaint within 2 working days. Follow-ups and request for clarifications shall be made within 7 days of receipt of the complaint. For complaints received through the anonymous GRM system, all communication with the complainant shall go via the call center. The HR manager shall treat complaints with the highest level of confidentiality.

Verification

At the direction of the HR Manager, the HR coordinator shall conduct preliminary verification of the issue. The verification is an initial fact-finding mission to confirm the circumstances of the allegation (place, time etc.), clarify all parties involved, and any other preliminary verification of the occurrence of the event. The responding party shall be informed at this point about the complaint made against him/her/them. The verification should take place within maximum 10 working days from receipt of complaint.

Decision on investigation

Based on the information provided through the verification, the HR Manager will consult with the Executive Vice President and/or Chief Operating Officer to determine the appropriate forum for further investigation (if required). The ultimate accountability for this decision rests with the EVP/COO. The selection of investigation mechanism shall be communicated to respondent and complainant.

Stage 2: Investigation

Investigations can be held at 4 different levels depending on the nature of the complaint.

Legal offence

At the occurrence of a legal offence, the case will be referred to the appropriate state agency. This could either involve law enforcement, or when appropriate other agencies such as Ghana Labour Department, the National Labour Commission, Commission for Human Rights & Administrative Justice (CHRAJ), or the Courts of Law. For complaints of occurrences outside of Ghana, a respective agency will be identified and contacted in the relevant country/ies.

Major misconduct

Major misconduct could involve issues such as: i) theft, fraud, dishonesty, or deliberate falsification of records; ii) insider dealing; iii) disclosure of confidential information to an unauthorized third party; iv) being under the influence of alcohol or non-medicinal drugs or illegal substances at work; v) causing actual or threatening physical harm, and; vi) harassment (for example, sexual, racial, religious, disability, sexual orientation and gender identity harassment, and ageism). When the EVP/COO and HR manager assess that a major misconduct has taken place, a Grievance Committee (GC) will be set up to investigate the case. Each case will be investigated by a temporary bespoke GC, tailored to the requirements and circumstances of the specific case. There will not be any permanent GC structures. The committee will have at least 4 members and be chaired by the HR manager). In addition to the HR manager, the GC shall also involve one representative from ACET's management. The GC shall report regularly to ACET management, with a more comprehensive report submitted upon closure of the case.

The GC shall be tasked with undertaking a more in-depth investigation, including inter alia interviewing witnesses, collecting and confirming key data and information points, and analyzing key facts. Once sufficient data has been collected, the GC will arrange a panel session with the respondent and, if appropriate, the complainant or a representative of the complainant. The panel session will review the data, give the respondent an opportunity to present their version, and might also invite further witnesses if appropriate.

The GC shall then formulate recommendation of actions to be presented to ACET's management. ACET management can approve or reject the suggested action. No action will be taken without management's approval.

Minor misconduct

If the EVP/COO deem that the case involves a minor misconduct (e.g., minor diversion from Code of Conduct such as tardiness, absence without leave, careless use of company equipment etc.).

The HR office will undertake the investigation, which will inform an interview with the respondent (and possibly complainant). Similar to the panel session, the interview will provide an opportunity to review the facts and for the respondent to provide their version. In cases where the HR office is the respondent or complainant, the EVP/COO will undertake the investigation.

The HR office shall then formulate recommendation of actions to be presented to ACET's EVP/COO, who can approve or reject the suggested action. No action will be taken without EVP/COO approval. In cases where the EVP has replaced the HR as key investigator, the COO will provide the approval and vice versa.

The records of the proceedings shall be kept in file and a bi-annual report presented to ACET management.

Conflict resolution

The HR office shall organize and facilitate conflict resolution sessions, inviting both parties and other relevant persons, such as e.g., staff members' supervisors.

Stage 3: Response action

Response actions shall range from simple verbal warnings to dismissal of culprits based on the gravity of the complaint and the outcome of the administrative processes. More drastic measures shall be taken on repeat offenses where the complaints made pertains to the same person.

Stage 4: Follow-up

Feedback

The complainant and respondent shall be informed of a decision on action within 2 working days.

Appeal

Appeal can be made to ACET President, who is the final arbiter in the matter. ACET's President may mediate, refer to new Grievance Committee, or reject the appeal.

Monitoring and Reporting

The HR Manager shall be responsible for the monitoring and evaluation of the actions and steps taken to resolve the issue. Each case shall be written up, encrypted, and archived in ACET's grievance folders, only accessible to the HR office. The HR Manager shall submit bi-annual reports to ACETs' management, providing an anonymized overview of the procedures and resolutions over the last 6 months.

Timelines

The period between acknowledgement of receipt and confirmation of response action shall not take more than 30 days. For more substantive cases, ACET however reserves the right to request a 14-day extension if and when needed.