



# **African Center for Economic Transformation Grievance Redress Mechanism**

**May 2022**

## 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

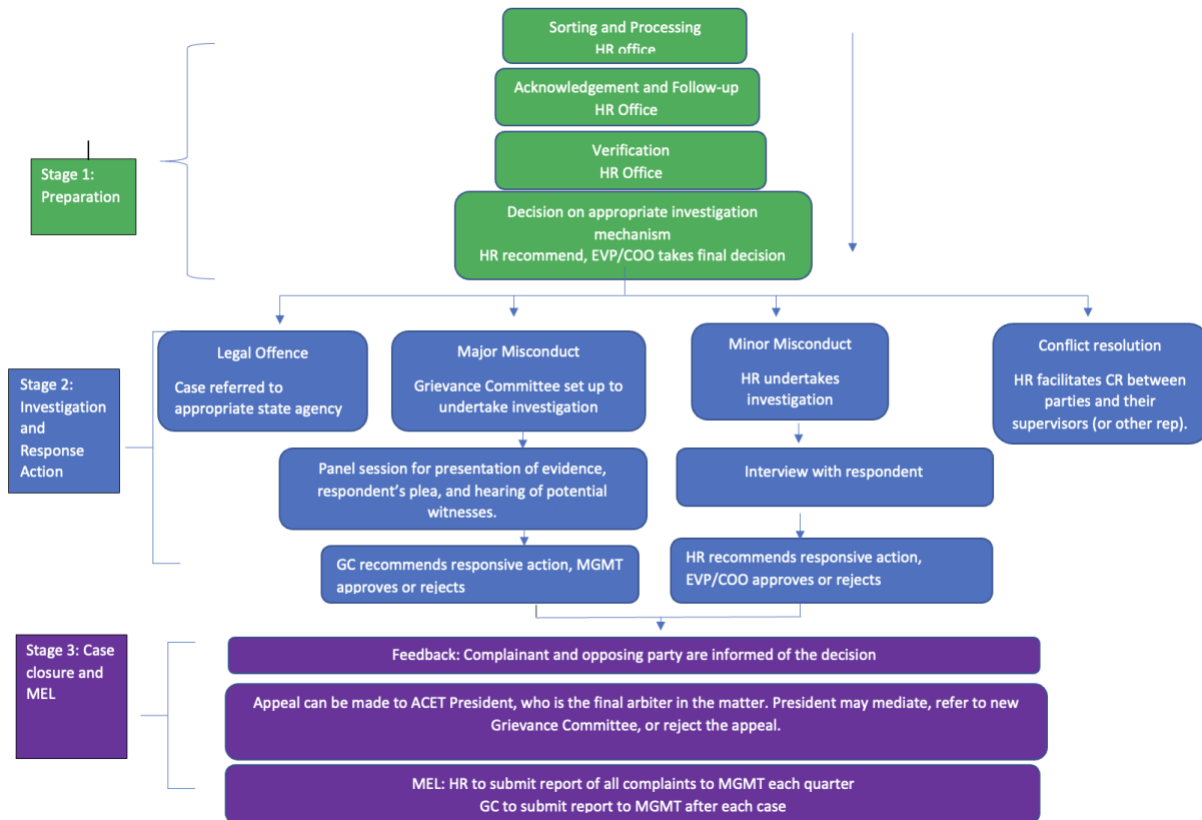
Complaints made by external stakeholders and beneficiaries can either be processed through the stages presented below or be redirected to the World Bank's GRM processes. The decision to use the World Bank system can be triggered either by:

- a request by the complainant specifying that they prefer to utilize the World Bank's system, or:
- a recommendation by the EVP/COO at the finalization of the first preparatory stage. In case of conflict of interest, the President will be responsible for the decision.

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 will be responsible for sorting the grievances received either through the anonymous platform or through the direct complaint process. They will be 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 is towards to 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.