

**GHANA INTEGRITY INITIATIVE (GII)**  
(GHANA CHAPTER OF TRANSPARENCY INTERNATIONAL (TI))



**MANUAL OF POLICIES AND ADMINISTRATIVE  
PROCEDURES**

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Effective date: December 1, 2023

A handwritten signature in black ink, appearing to be 'E. Kwabena Ansah', written over a dotted line.

**Dr. Emmanuel Kwabena Ansah**  
**BOARD CHAIRPERSON**

A handwritten signature in black ink, appearing to be 'Mary Awelana Addah', written over a dotted line.

**Mary Awelana Addah**  
**EXECUTIVE DIRECTOR**



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**SECTION A**  
**INTRODUCTION**

**A 0100 THE ORGANISATION**

A 0101 *The Establishment*

A 0102 Ghana Integrity Initiative (GII) was established in May 1999 and inaugurated in December 1999. It is registered under the Companies Act, 1963 Act 179 as a company limited by guarantee. GII is the Ghana Chapter of Transparency International (TI).

TI is the global, non-governmental, non-profit, civil society movement leading the fight against corruption worldwide through more than 100 national chapters and over 30 individual members with its international secretariat in Berlin, Germany. GII gained accreditation as an affiliate of Transparency International (TI) in the year 2005 and as such GII is the recognised chapter of Transparency International (TI) in Ghana. GII being the Ghana Chapter of TI subscribes to the core values, the guiding principles and the core activities enunciated by TI.

A 0103 GII shall manage its affairs democratically and shall pursue exclusively and directly non-profit making goals and shall act altruistically; its primary motive shall not be profit oriented.

A 014 The funds of GII may only be used for the stated purposes of GII pursuant to the Regulations of GII and a member of GII may not, in that capacity, receive allocations from GII funds, while no person may benefit from those funds through expenditure which is not in line with the purpose of GII, or through disproportionately high remuneration.

A 0104 GII shall be politically non-partisan and non-sectarian in its work and shall ensure that the cause for which GII shall advocate is advanced without favours to any political party or any other institution while GII's political independence and the public perception shall be painstakingly guarded.

A 0105 GII shall approach its work by building coalitions and collaborations with concerned stakeholders and shall ensure that the coalition building approach brings together actors from government, business, academia, the media, civil society and other interested groups making sure that in building coalitions, GII shall adopt a non-confrontational style.

A 0106 GII shall concentrate on reforming the systems that enable corruption to occur and take root, as the TI movement is convinced that the way forward is through institutional reform and raising awareness, which can only be achieved with the support of coalitions of civil society, the media and private business.

A 0107 GII shall comment on issues involved in corruption cases once the substance of the case is in the public arena without asking a direct judgment on the truth or otherwise of the charges of alleged corruption and in making any comment, GII shall make all possible efforts not to be seen to take sides in partisan conflicts, and as a rule, comments shall address the systematic questions raised in each case rather than commenting on particulars of individual case.

A 0108 *Vision, Mission, Core Values, Guiding Principles and Core Activities*

A 0109 The **vision** of GII is: “a corruption-free society where all people and institutions act accountably, transparently and with integrity”.

A 0110 The **mission** of GII is: “to fight corruption and promote good governance in the daily lives of people, institutions and the national governance system by forging strong, trusting and effective partnership with government, business, the media and civil society and engagement with the people”.

A 0111 The **core values** of GII are:

1. Transparency

GII is committed to openness and honesty in its organization, structures, policies and activities and communicates actively to stakeholders both internally and externally and make information publicly available.

2. Accountability

We take full responsibility for our actions and work assiduously towards achieving the highest value for money. We shall continuously demonstrate the ownership necessary for achieving desired results. We understand accountability as the process of seeing it, owning it, solving it, and doing it, and requiring a level of ownership that includes making, keeping, and answering for all commitments.

3. Integrity

A fundamental principle of GII is to be straightforward and honest in the conduct of its affairs, exercise due care, fairness and truthfulness at all times, and doing what is right and not what is easiest. We aspire to work with the highest ethical standards and act with professionalism.

4. Independence

GII’s governance, programmes and policies are non-partisan and independent of specific governments, political parties and the business sector. Independence shall allow GII to carry out its work freely and

objectively. Objectivity shall ensure that GII shall have an impartial, unbiased attitude and avoid prejudice and conflicts of interest.

5. Commitment

We are passionate about tackling corruption and helping to address its negative impacts on Ghana's socio-economic development and growth.

A 0112 The **guiding principles** of TI which GII has adapted are:

1. As coalition builders, we will work cooperatively with all individuals and groups, with for-profit and not-for-profit corporations and organisations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing body.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with, and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for the fundamental human rights and freedom.
9. We are committed to building, working with and working through chapters worldwide and the TI Secretariat.
10. We will strive for balanced and diverse representation on our governing body.



11. As one global movement, we stand in solidarity with each other, and we will not act in ways that may adversely affect other chapters or the Transparency International movement.

A 0113

The **core activities** of TI which GII has adopted are:

1. **Awareness-Raising** – Awareness-raising is a central aspect of TI advocacy, and the TI Secretariat and TI Chapters communicate to different audiences the grave impact of corruption on a whole range of sectors. At a global level, TI publications and tools such as the *Bribe Payers Index*, the *Corruption Perception Index*, the *Global Corruption Barometer*, the *Global Corruption Report*, the bi-annual International Anti-Corruption Conference (IACC) and TI's Anti-Corruption Awards are all aimed at raising awareness on the detrimental effects of corruption.
2. **Monitoring** – Assessing the incidence of corruption and monitoring trends and reform programmes is another core-priority of TI. National surveys on the perception of corruption, monitoring of election financing and public procurement are examples of TI activities in this area.
3. **Advocacy** – To provide the knowledge base for reforms in the anti-corruption field, TI disseminates best practices and tools to contain corruption. TI's flagship publication, the *Source Book*, provides policymakers and anti-corruption practitioners with comprehensive blueprint for good governance and accountability. It argues the case for a "National Integrity System", a holistic approach to transparency and accountability including the public sector, the judiciary, the media and civil society as "pillars of integrity".

TI's *Annual Global Corruption Report* has specific focus each year and provides an assessment of the state of corruption around the world, and it explores topics of national corruption from a local perspective and a selection of the corruption-related data and research.

TI's *Corruption Fighters' Tool Kit* is a compendium of practical civil society anti-corruption experiences described in concrete terms and accessible language, and it presents innovative anti-corruption tools developed and implemented by TI National Chapters and other civil society organisations from around the world.

A 0114

### ***GII Image***

A 0115

The name "Ghana Integrity Initiative (GII)" and the logo depicting "TI" are two of the organisation's most valued possessions and it is the name and the logo which distinguish the organisation from other organisations and the way this name and the logo are presented graphically and verbally has a significant impact on public perceptions of the organisation.

A 0116 Lack of clear graphic identity or an inconsistent use of that identity can create confusion and misunderstanding while consistent use of the name and the logo shall help maintain and enhance the identity of the organisation and, as much as possible, all publications of GII shall bear the name and logo appropriately.

A 0117 It is essential that employees reflect the organisation's commitment to transparency, accountability and integrity and an appropriate, clean and professional appearance of a member, a Board member or an employee becomes a matter of considerable importance, especially when the member, the Board member or the employee is engaged in meeting the public as a representative of GII.

## **A 0200 THE MANUAL**

A 0201 This Manual contains the latest approved policies and administrative procedures to serve as best practices to govern the behaviour of members, the Board of Directors and the employees in the corporate management and operations of GII, and forms the basis of the social contract between GII and its key stakeholders made up of the members, the Board of Directors, employees and the public and provides a guide and reference point to employees in the flow and control of clerical work within GII, and a formal structured system to aid the objective application of rules and regulations to ensure effective and efficient performance within GII.

A 0202 The Manual is approved by the Board of Directors based on the Board of Director's continued resolve to implement policies, practices and procedures which shall lead to the realisation of the vision, mission, core values and objectives of GII in the most effective, economical and efficient manner.

A 0203 As the Manual may not cover all cases dealing with every policy and administrative procedures likely to be encountered at the workplace, the exigencies of the situation, initiative and innovation shall be factors in applying the Manual, while persons in doubt in specific cases are encouraged to seek guidance from responsible officials or higher authority within GII.

A 0204 The Manual shall be amended from time to time as the need arises to make it more relevant to current situations.

A 0204 The following GII documents shall be construed to be part of this Manual:

1. Manual of Terms and Conditions of Service of Employees,
2. Manual of Financial Regulations,
3. Manual of Programmes and Projects, and
4. Any other document developed to guide the conduct of the Members, Board of Directors and Employees and the work of GII.

- A 0205 Every member of GII, every member of the Board of Directors and every employee shall always endeavour to act in accordance with the provisions of this Manual.
- A 0206 The Regulations of Ghana Integrity Initiative shall be the supreme law of GII, and the provisions of this Manual shall not be read and interpreted to be inconsistent with the provisions of the Regulations of Ghana Integrity Initiative.

## SECTION B

### THE ESTABLISHMENT

#### **B 0100 THE ORGANS OF GII**

B 0101 The organs of GII are:

1. The Membership Meeting which shall comprise members who have paid their annual subscription,
2. The Board of Directors, and
3. The Secretariat

#### **B 0200 MEMBERSHIP**

##### ***B 0201 Qualification and Disqualification***

B 0202 Members form the bedrock of GII and are the people with knowledge, expertise or influence who can sustain GII, give it visibility, credibility and access and who are prepared to pledge themselves in some way to GII and its values and Members of the Board of Directors are drawn from the Members.

B 0203 Membership is open to individuals and organisations of recognised integrity that acknowledge the Regulations of GII and are committed to the active promotion and realisation of GII's vision, mission, core values, guiding principles, objectives and core activities.

B 0204 Membership is granted by decision of the Board of Directors.

B 0205 A person:

1. Associated with a political party,
2. Actively involved in partisan party politics,
3. Holding political party office,
4. Holding an office in government which shall be construed to be political in nature,
5. Known to have been associated with a political party or actively been involved in partisan party politics or has held an office in government which shall be construed to be political in nature during the past five years, or
6. With criminal record or convicted of criminal act by a competent court of jurisdiction shall be disqualified to be a Member of GII,

- B 0206 An individual may be considered for membership as an Ordinary Member through self-application by filling a Membership Application Form supported by a Board member and approved by the Board of Directors.
- B 0207 The status of a member terminates upon the death of the member, and a member may resign membership or office by notice in writing to the Executive Director.
- B 0208 All membership rights cease with the termination of membership, but on the termination of membership, membership fees owed to GII remain to be paid.

### ***Membership Meetings***

- B 0209 A Membership Meeting to which any member who has paid his or her annual subscription shall be entitled to attend, and a membership meeting specified as an Annual Membership Meeting (AMM) shall be held at least once in each calendar year, and the AMM shall be responsible in particular for the following:
1. Consider and approve the Annual Report and financial statements of GII presented by the Board of Directors and give formal approval to the actions of the Board of Directors,
  2. Determine the annual subscription, if any, to be paid by Members,
  3. Approve the nominations of persons for the positions of the Chairperson, the Vice Chairperson and members of the Board of Directors,
  4. Approve amendments to provisions of the GII Regulations,
- B 02010 Decisions of Membership Meeting shall be made by a simple majority of all valid votes cast in person or by proxy, except that:
1. A majority of two-thirds of such votes is required to amend the GII Regulations, to remove the Chairperson, the Vice-Chairperson or a Member of the Board of Directors, and
  2. A majority of three-quarters of such votes is required to dissolve GII, and in all cases, abstention shall not be deemed to be a valid vote.
- B 0211 Minutes shall be kept of decisions of the Membership Meeting and signed by the minute taker and by the person who chaired the meeting.

## **B 0300 BOARD OF DIRECTORS**

### ***B 0301 Composition of the Board of Directors***

- B 0302 The governing body of GII shall be vested in the Board of Directors which shall be responsible for the Membership Meeting.
- B 0303 The Board is made up of a Chairperson, Vice-Chairperson, and seven other members approved by the Annual Membership Meeting, all of whom shall be members of GII.
- B 0304 Transparency in communication among Board Members is important and in particular, it is important for Board Members to inform each other, directly, or through the Board Chair or the Executive Director, as soon as practicable, concerning their activities and other matters that relate significantly to GII mandate.
- B 0305 A person shall complete a Board Member Commitment Form (Form XX) before he or she is nominated or re-nominated for membership of the Board of Directors
- B 0306 At the end of every year, the Executive Director shall complete a Board Member Evaluation Form (Form XX) in respect of every serving member of the Board of Directors and the completed form shall serve as part of the evidence to be used in assessing the suitability of the member for re-nomination as a member of the Board of Directors after the term of such a member.
- B 0307 ***Responsibilities of the Board of Directors***
- B 0308 The Board of Directors shall have the responsibility in particular for the following:
1. Developing corporate policies, plans and objectives, setting performance objectives, reviewing and guiding corporate strategy and overseeing major capital expenditures,
  2. Articulating, safeguarding, modelling and promoting GII values as well as enhancing its public image,
  3. Monitoring implementation and measuring organisational performance against the developed policies, plans and objectives,
  4. Monitoring and managing potential conflicts of interest of management, board members and members, including misuse of corporate assets and abuse of related party transactions,
  5. Monitoring the effectiveness of the governance practices under which it operates and making changes as needed,
  6. Implementing decisions of the Membership Meeting,

7. Ensuring that the financial structure of GII is solid and well grounded,
8. Ensuring the integrity of GII's accounting and financial reporting systems, including independent audit, and appropriate systems of control are in place, in particular, systems for monitoring risk, financial control and compliance with the law,
9. Approval of the annual budget statement,
10. The preparation of the Annual Report and the Annual Returns as provided under section 127 of the Companies Act, 2019 (Act 992),
11. Acting as a voice for the various stakeholders of GII,

B 0309 In all these responsibilities, the Board of Directors shall retain the non-delegable corporate responsibilities of:

1. Attending regularly scheduled Board Meetings,
2. Developing an explicit statement of values for GII,
3. Monitoring and appraising the performance of the Executive Director and other management staff, and
4. Providing a linkage between GII and the public,

B 0310 ***Committees of the Board of Directors***

B 0311 Committees of the Board of Directors may be established from time to time to deal with specific issues and in particular the following Committees shall be formed:

1. Proposals, Programmes and Projects Committee
2. Finance, Accounts and Audit Committee
3. Fund Raising and Publicity Committee
4. Legal and Human Resource Management Committee

B 0312 A member of the Board of Directors shall serve on at least one committee of the Board of Directors.

B 0313 ***Meetings of the Board of Directors***

B 0314 A schedule of meetings for every calendar year shall be drawn by the Executive Director, in consultation with the Board Chairperson stating the date, time and venue and submitted to Board Members for approval at the last meeting before the end of a calendar year and there shall be at least one meeting every quarter.

B 0315 Extraordinary Board Meetings shall be called by the Board Chairperson where such action is necessary to the interests of GII.

- B 0316 Questions arising at any meeting of the Board of Directors shall be decided by a majority of votes and each Board Member present at any meeting is authorised to exercise one vote; or if vote is through any other means, each Board Member shall exercise one vote, and in the event of there being no majority, the Board Chairperson and in his or her absence, the person acting as the Chair for the meeting shall have a second or casting vote.
- B 0317 Minutes of every meeting shall be kept of the decisions made and signed by the minute taker and by the person who chaired the meeting, and every effort shall be made to circulate the minutes to all Board Members within a month after the meeting by the Executive Director.
- B 0318 The Board Chairperson shall attend and represent GII at TI Annual Membership Meetings, as the Official Chapter Representative; and in a situation where the Board Chairperson is unavailable, the Vice-Chairperson or in a situation where both are not available; the Executive Director shall attend and represent GII.
- B 0315 Board Members shall receive a stipend to cover what they spend on the Board business (i.e. travel, accommodation, food, etc.) but shall not be paid salary or profit from the exercise of their functions as Board Members.

**B 0400 THE SECRETARIAT**

B 0401 *The Functions of the Secretariat*

- B 0402 There shall be a GII Secretariat which shall be responsible for all matters relating to management, administration and finance of GII, unless the responsibility for these has been expressly vested in the Board of Directors, Committee(s) of the Board or Board Member, and in particular the Secretariat shall:
1. Prepare and call all Membership Meetings and Board of Directors Meetings and propose the agenda in consultation with the Chairperson of the Board of Directors,
  2. Perform the actions decided by the Board of Directors,
  3. Prepare the budget, keep proper books of account and prepare the annual report,
  4. Implement the policies, plans, strategic decisions, programmes, projects and activities of GII,
- B 0403 The GII Secretariat shall refer strategic issues to the Board of Directors for its decision.



**B 0500 EXECUTIVE DIRECTOR**

**B 0501 *Duties of the Executive Director***

B 0502 The GII Secretariat shall be headed by the Executive Director who shall be the principal Technical and Administrative Head and the Chief Executive Officer.

B 0503 The Executive Director shall be the custodian of this Manual

B 0504 The Executive Director shall be accountable and responsible to the Board of Directors for implementing GII policies, procedures, strategic plan and directions and the management of the corporate governance process.

B 0505 The Executive Director shall attend all meetings and record minutes of all proceedings and shall give and cause to be given notice to all meetings of Membership Meetings, Board of Directors and Committees of the Board of Directors and shall perform such other duties as may be assigned by the Board of Directors.

B 0506 The Executive Director shall have no vote at meetings.

B 0507 Where the Executive Director is invited to act as resource person by an organisation and is paid honorarium or a fee, this shall be disclosed to the Board Chairperson and where an employee is invited to act as resource person by an organisation and is paid honorarium or a fee, the employee shall disclose this to the Executive Director.

D 0508 The Executive Director shall be the Chief Disciplinary Officer and act in all cases of discipline in line with the directive of the Board of Directors and may query an employee in respect of any act or omission that, in the view of the Executive Director, warrants formal explanation.

**B 0600 RESTRICTIONS ON THE POWERS OF THE SECRETARIAT AND THE EXECUTIVE DIRECTOR**

B 0601 No document which seeks to bind GII with another person or which seeks to promote GII to the public shall leave the premises of GII without approval from the Board of Directors

**B 0700 DEPARTMENTS AND UNITS**

B 0701 GII shall have the following departments:

1. Programmes Department and shall be headed by the Programmes Manager
2. Accounts Department and shall be headed by the Accounts Manager
3. Fund Raising Department and shall be headed by the Funds Raising Manager

B 0702     ***The Programmes Department***

B 0703     The Programmes Department shall implement the various programmes and projects of GII with each programme or project under a Programme Co-ordinator or a Project Co-ordinator.

B 0704     The Programmes Manager shall report directly to the Executive Director, while a Programme Co-ordinator or a Project Co-ordinator shall report directly to the Programmes Manager.

B 0705     The Programmes Manager, the Programme Co-ordinators and the Project Co-ordinators shall be responsible for the work performance of respective employees under them.

B 0706     ***The Accounts Department***

B 0707     The Accounts Department shall be responsible for the keeping of proper records in such form as to enable financial statements which show true and fair view of GII's affairs to be prepared in accordance with the Companies Act, 1963, Act 179 and the International Financial Reporting Standards and with respect to the control of and accounting for all property acquired by GII, and the effective and efficient financial management of GII.

B 0708     The Accounts Manager shall report directly to the Executive Director and shall be responsible for the work performance of employees under him or her.

B 0709     ***The Funds Raising Department***

B 0710     The Funds Raising Department shall be responsible for sourcing for funds from outside traditional funders.

B 0711     The Funds Raising Manager shall report directly to the Executive Director and shall be responsible for the work performance of employees under him or her.

B 0712     ***Communications Unit***

B 0713     The Communications Unit shall be responsible for developing and maintaining relationships with journalists and media houses to ensure that GII's activities and messages receive media coverage.

B 0714     Produce high-quality contents such as reports, newsletters, press releases, articles, blog posts, and multimedia materials (videos, infographics) to convey GII's research findings, and advocacy messages

- B 0715 Manage GII's social media platforms to engage with the public, share updates, and create awareness about anti-corruption and integrity issues. This includes creating and scheduling posts, responding to comments, and analyzing engagement data.
- B0716 Ensure that GII's website is up to date with the latest information, reports, and resources, such as web design, content management, and ensuring the site is user-friendly.
- B7017 Building and maintaining a positive public image for GII by managing its reputation and handling crisis communication effectively.
- B0718 Assess the effectiveness of communication strategies and initiatives through data analysis, feedback collection, and surveys.
- B0719 Provide training and capacity-building programs for GII staff and partners to improve their communication skills and knowledge.
- B 0720 ***Management Committee***
- B 0721 There shall be a Management Committee which shall consist of the Executive Director as the Chairperson, the Programmes Manager, the Accounts Manager and the Funds Raising Manager to provide proper organisational direction and unity of effort within GII.
- B 0722 The Management Committee shall meet at least once a week and shall among others be responsible for matters pertaining to the effective and efficient management of all GII policies, strategic plan and directions and the management of the corporate governance process
- B 0723 ***Programmes Committee***
- B 0724 There shall be a Programmes Committee which shall consist of the Executive Director as the Chairperson, the other members of the Management Committee, Programme Coordinators, the Head of Communications Unit, Project Coordinators and Policy and Research Analysis Coordinator to aid internal communication and coordination of programmes and projects.
- B 0725 The Programmes and Projects Committee shall meet at least once a month and shall, among others, be responsible for matters pertaining to the effective and efficient management of all GII programmes and projects including, but not limited to, deliberating on reports from the Programmes Manager, the Programmes and Projects Co-ordinators

B 0726 ***Staff Meeting***

B 0727 There shall be a bi-monthly meeting of all employees conveyed by the Executive Director to discuss reports from the Programmes Manager, the Co-ordinators and Heads of Units and any other matters of interest to GII and the employees.

**B 0800 Research Monitoring, Evaluation and Learning Unit**

B 0801 GII shall regularly produce in-depth research papers and reports on specific corruption-related topics and issues, providing evidence-based insights and policy recommendations.

B 0801 There will be the annual publication of the Corruption Perception Index (CPI) report, including Ghana's CPI score, analysis of corruption trends, and international comparisons.

B 0802 GII shall develop and maintain a comprehensive M&E framework aligned with its strategic objectives, programmes, and projects.

B 0803 GII shall collect and analyse data from various sources, such as surveys, interviews, and reports, to track progress and performance against established indicators in projects and strategic plans.

B 0804 GII shall conduct periodic assessments to evaluate the effectiveness and outcomes of GII's anti-corruption efforts, measuring changes in behaviour, attitudes, and practices.

B 0805 GII shall foster a culture of learning and adaptation within the organization with regular reviews of the M&E framework to identify successes and challenges for redress.

B 0806 GII shall prepare and disseminate regular/quarterly M&E reports to communicate results, findings, and recommendations to GII's leadership, staff, and external stakeholders. The M&E unit shall report directly to the Executive Director.

## SECTION C

### CONFLICT OF INTEREST POLICY

#### **C 0100 GENERAL POLICY**

#### **C 0101 *Definition of Conflict of Interest, Scope and Application of Policy***

C 0102 For the purpose of this policy, a conflict of interest is a situation where anybody associated with GII is confronted with choosing between the duties and demands of his or her position with GII and that of his or her own private business. The definition as provided in the Article 284 of the 1992 republican Constitution refers.

C 0103 This policy sets minimum standards and is in line with the Conflict-of-Interest Policy developed by TI<sup>1</sup>

C 0104 This policy applies, except as otherwise stated, to every person associated with GII or its Secretariat as a Member, a Board Member, Staff members, Resource Person or employee.

C 0105 GII's efforts to raise the ethical standards of government officials, businesspeople and other individuals could be compromised by any ethical lapses on the part of individuals representing GII, and it is essential that everyone associated with GII be highly sensitive to potential conflicts of interest.

C 0106 The “interests of any person associated with GII” include the interests of any such person with whom he or she has a close personal relationship, including his or her spouse, life partner, children, parents or siblings.

C 0106 Every person associated with GII as stated in paragraph C0401 shall avoid or manage any potential, real or perceived conflict of interest in a manner which shall include refraining from any decision making or voting on matters subject to a potential conflict of interest and openly acknowledge any potential or actual conflict of interest which arises through his or her association with GII.

C 0107 Conflicts of interest may arise from time to time during such persons’ activities and decisions, and they may arise in their work for GII with regard to pecuniary or financial interests, or interests that impede them in their duty to act in the best interests of GII.

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<sup>1</sup> <https://files.transparencycdn.org/images/Conflict-of-Interest-Policy.pdf>

C 0108 A member of the Board of Directors shall declare all his or her financial and non-financial interests apart from those which could not potentially lead to or could not conceivably be perceived as a conflict of interest and such a declaration shall be lodged with the Executive Director and shall be open to inspection by other members of the Board of Directors.

**C 0200 PROVISIONS OF THE COMPANIES ACT, 2019, (ACT 992)**

C 0201 The Companies Act, **2019, (ACT 992)** states under section 190 – *Duties of Directors* as follows:

1. A Director of a company stands in a fiduciary relationship towards the company and shall observe the utmost good faith towards the company in a transaction with or on behalf of the company.

2. A Director shall always act in what the Director believes is the best interest of the company as a whole, so as to preserve the assets, further the business, and promote the purposes for which the company was formed, in the manner that a faithful, diligent, careful and ordinarily skilful Director would act in the circumstances and in doing so shall have regard to:

- a. the likely consequence of any decision in the long term,
- b. the impact of the operations of the company on the community and the environment, and
- c. the desirability of the company maintaining a reputation for high standards of business conduct.

3. A Director of a company shall:

- a. act in accordance with the Constitution of a company, and Companies Act, 2019, (Act 992),
- b. only exercise powers for the purposes for which the powers are conferred,

4. In considering whether a particular transaction or course of action is in the best interests of the company as a whole, a Director may consider the interests of the employees, as well as the members, of the company, and, where appointed by, or as representative of, a special class of members, employees, or creditors may give special, but not exclusive, consideration to the interests of that class.

5. A Director shall exercise independent judgment.

6. A provision, whether contained in the constitution of a company, or in a contract, or in a resolution of a company shall not relieve a Director from the duty to act in accordance with this section or relieve the Director from a liability incurred as a result of a breach of a provision of this section”.

C 0202 The Companies Act, 1963 Act 179, states under section 207 – *Contracts in which Directors are Interested* as follows: “Unless otherwise provided in the company’s Regulations, a Director notwithstanding section 205 of this Code, shall be entitled to enter into a contract with the company and, subject to compliance with section 203 of this code and with subsection (2) to (7) of this section, such contract or any other contract by the company in which any Director is in any way interested shall not be liable to be avoided nor shall any director be liable to account for any profit made thereby by reason of such a director holding that office or of the fiduciary relationship thereby established”.

C 0203 The Companies Act, 2019 (Act 992), states under section 197- Directors to act professionally that “Except as otherwise provided in the constitution of a company, a Director may, despite section 192, act personally or by the firm of that Director in a professional capacity for the company, except as auditor, and the Director or the firm of the Director is entitled to proper remuneration for professional services as if the director were not a director, provided that disclosure is made under subsection (6) of section 194”.

C 0204 A Director shall conform to all the provisions of the Companies Act stated in this Manual

### **C 0300 REMUNERATED WORK, CONTRACTS AND CONSULTANCIES**

#### **C 0301 *Prohibition of Contract of or for Service***

C 0302 A member of the Board of Directors of GII, or companies or other organisations with which such a Board Member is currently affiliated, may not perform remunerated work for GII Secretariat, except that the Board Member may serve concurrently as a paid officer or staff member of GII under a contract approved by Board of Directors.

#### **C 0303 *Permission for contract of or for Service Section 194***

C 0304 Despite paragraph C 0301, a member of the Board of Directors of GII or companies or other organisations with which such a member is currently affiliated, may apply and compete for remunerated work contracts with GII, provided however that the Board Member is not offered any advantages over any competitors with respect to being awarded or carrying out such work, and in addition the Board Member shall not utilise privileged information and do everything to contradict the perception of having utilised privileged information, and the Board Member

shall not exercise his or her Board function to the extent it relates to the conditions of the contract or the selection or supervision of such contract.

C 0305 Subject to paragraph C 0302, a Member of the Board of Directors of GII or companies or other organisations with which such a member is currently affiliated, shall not be disqualified for remunerated work contracts with GII because of his or her affiliation with GII, but neither may he or she be given the “inside track”.

C 0306 When doing non-GII related work, a member of the Board of Directors of GII or his or her companies shall not utilise privileged GII information and shall also be sensitive to the perception that he or she might be utilising such information.

C 0307 A resource person active anywhere in the TI movement, or companies or other organisations with which such an individual is affiliated, may apply and compete for remunerated work contracts with GII, provided he or she is not offered any advantages over other competitors with respect to being awarded or carrying out such work, but the resource person shall not utilise privileged information and do everything to contradict the perception of having utilised privileged information.

C 0308 When doing non-GII related work, a resource person shall not utilise privileged GII information and shall also be sensitive to the perception that he or she might be utilising such information.

C 0309 In all cases, GII shall be transparent in its decision-making processes when commissioning paid work, and shall follow transparent tender procedures, and GII shall nor hire or undertake any business with members of immediate family, i.e. a spouse, parent, child or sibling of any of its staff or its Board members without specific authorization through unanimous decision of the Board of Directors which may consider such possibility only after the due process ensuring open competition and a fair level playing field has been exhausted.

#### **C 0400 GIFTS AND ENTERTAINMENT**

C 0401 No person associated with GII shall accept any gift, entertainment, loan or anything else of value from any organisation or individual if it could be reasonably construed or perceived that the gift is motivated by a wish to influence GII.

C0402 Where such an offer of gift, entertainment, loan or anything of value is made to any person associated with GII, the individual involved shall notify the Executive Director or in the case of the Executive Director the Board of Directors immediately.



**C 0500      HOW TO DEAL WITH A POSSIBLE CONFLICT OF INTEREST**

C 0501      Potential conflicts of interest shall be identified and declared by the person in potential conflict, or reported by other members of GII, as soon as they become aware of such potential conflict of interest.

C 0502      Such a disclosure or report shall be made to the Chairperson, a Board Member.

C 0503      The evaluation of a potential conflict of interest shall be made by the Board of Directors, and the evaluation may determine the absence of a conflict of interest, or it may lead to the conclusion that:

1. The respective person shall not go ahead with the evaluated activity or that,
2. He or she shall recuse himself or herself from participating in decision making by GII with reference to the matter in conflict,

C 0504      The Board of Directors and the GII Secretariat shall be responsible for ensuring that all persons associated with the activities of GII are made aware of the policies and procedures regarding conflict of interest, and in addition, these policies and procedures shall be made available to the general membership through publication, for example, on the website or in a newsletter.

**C 0600      DISCLOSURE OF PAYMENTS TO NATIONAL CHAPTER OR TI INTERNATIONAL BOARD MEMBERS**

C 0601      When GII or the TI Secretariat makes payments including allowances but, excluding approved expenses and per diems, to a Board Member or an employee of GII, this shall be declared in full in the annual financial statements and Annual Report of GII, and such reporting shall also outline the procurement or tender procedures conducted that led to such payment.

**C 0700      TI BOARD'S ETHICS COMMITTEE**

C 0701      TI's International Board of Directors has established an Ethics Committee for the purpose of providing advice on ethical questions to anybody associated with the movement, and the Terms of Reference and contact details of the Board Ethics Committee can be obtained through the TI-Secretariat or the Internet.

## **SECTION D**

### **EMPLOYMENT POLICY**

#### **D 0100 PERSONNEL POLICY**

D 0101 The Employment Policy is approved by the Board of Directors based on the Board of Director's continued resolve to put in place an enlightened personnel policy which seeks to encourage the employees to perform with efficacy and efficiency, to act with integrity and transparency and a commitment to GII's development and growth to a level that compares with the best in its field of operation, bearing in mind the fact that as an anti-corruption institution GII relies on donor funding and other solicited sources of funding for its activities.

#### **D 0200 MANPOWER SURVEY**

D 0201 The optimum staff complement within GII shall be determined, in the first instance, by a manpower audit conducted to ascertain the number and type of staff required for the efficient and effective management of GII and thereafter, on an annual basis, the staff position shall be reviewed by the Chief Executive Officer to determine new manpower levels arising from prior or forecasted changes in operations of GII and recommendations made to the Board of Directors for approval.

#### **D 0200 ENGAGEMENT OF EMPLOYEES**

D 0201 GII shall always endeavour to engage and retain the most qualified persons through transparent and competitive process to fill vacancies within the organisation and offer every employee competitive condition of service taking into account the resources of the organisation and provide the opportunity to the employee to make progress within the organisation.

D 0202 The performance, progress and lifestyle of every employee shall be the subject of continual study and of interest to top management.

D 0203 The appointment or the dismissal of an employee shall be the ultimate responsibility of the Board of Directors, and an employee shall derive his or her employment, his or her position and salary grade from the Board of Directors.

D 0204 All appointments and dismissals shall first be approved by the Board of Directors.

- D 0205 A person shall only be employed on a prior approved programme or project and the Executive Director shall recommend every employment on a prescribed form.
- D 0206 The engagement of a permanent employee in GII shall be on the basis of a vacancy existing in the Department or the Unit into which the employee is to be engaged, and a vacancy shall exist either by occurrence of an unfilled job position, or the new requirement of an additional position approved by Board of Directors.
- D 0207 A casual or temporary employee may be engaged at the discretion of the Executive Director on the advice of the Head of Programmes Department or the Head of Unit under whom the casual or temporary employee is to work.
- D 0208 An applicant for employment shall be carefully screened and investigated with all references checked and any gaps in the employment history of the applicant satisfactorily explained.
- D 0209 On engagement, an employee shall be awarded the salary and allowances specified and follow the career prospects established in the Manual of Terms and Conditions of Service for Employees.
- D 0208 An employee shall commit himself or herself to the realisation of the vision and mission of GII and shall always act in accordance with the Core Values, the Guiding Principles and Code of Ethics of GII.

**D 0300 JOB DESCRIPTION**

- D 0301 Job descriptions shall be prepared for every established position and shall specify the minimum basic educational qualification and the minimum relevant working experience which a new entrant is expected to possess, and a new entrant shall satisfy minimum entry qualifications in terms of educational qualification and working experience required in the job description of the position he or she is to fill, and as far as possible, be based on merit.

**D 0400 STAFF DEVELOPMENT POLICY**

- D 0401 GII shall take advantage of all opportunities offered by the TI Secretariat and other donors of any staff development programmes made available to it to ensure that employees avail themselves to such programmes to enhance their skills and competencies.
- D 0402 Within its limited resources, GII shall endeavour to sponsor employees to undertake short Continuous Professional Development programmes offered by management development agencies and professional bodies which management considers skills enhancing.

**D 0500            APPRAISAL POLICY**

D 0501            Each employee of GII shall undertake an annual performance review with his/her Line Manager. This will involve reviewing the past year's performance, setting objectives for the next year and discussing professional development needs.

D 0502            The Appraisal Process shall be managed by Line Managers, using the GII approved template for the purpose.

D 0503            The appraisal process is designed to promote the effective achievement of GII objectives by:

- a) Ensuring that individual efforts are linked to the objectives of the organization,
- b) Agreeing on clear performance objectives for each staff member for each year (aligned to the duties and responsibilities of their role and to the overall GII strategic plan), and appropriate personal development/training to achieve those objectives,
- c) Improving the motivation and performance of staff by giving them positive feedback on their progress against objectives, recognizing good performance and agreeing actions to strengthen and improve performance where appropriate,
- d) Improving communication and giving the employee the opportunity to raise issues or concerns with their Line Manager. The effectiveness of the appraisal process is a shared responsibility between the staff members and their Line Manager

D 0504            All GII Line Managers are expected to:

- a) Complete a performance assessment for the year for each of their direct reports,
- b) Make quality time available for the discussions with each of their direct reports,
- c) Allow their direct reports time to prepare,
- d) Discuss their assessment and self-assessment with each direct report, giving feedback on performance and progress, emphasizing what has been done well and giving constructive feedback about what might need to be improved in the future,
- e) Agree on SMART objectives for the year ahead with each direct report and discuss their learning and development needs,
- f) Ensure employees are clear regarding measurement criteria/expectations for the new objectives,

D 0505            All GII employees are expected to:

- a) Complete a self-assessment of their performance in the year (or part year) under review,
- b) Discuss with their manager their performance against their objectives,
- c) Provide constructive feedback to their Line Manager regarding management support, and be prepared to receive feedback themselves,
- d) Work with their Line Manager to ensure that they have clear and achievable objectives for the year ahead and discuss their learning and development needs,
- e) Take responsibility for their own performance and development,

**D 0506** The appraisal process shall include the following four (4) stages:

- a) A review of performance against objectives,
- b) The setting of objectives for the year ahead,
- c) Establishing training and development needs for the year ahead,
- d) A mid-year review of progress against objectives,

**D 0600 ANTI-FRAUD POLICY**

D 0601 The International Auditing and Assurance Standards Board (IAASB) defines fraud as: “an intentional act by one or more individuals among management, those charged with governance, employees, or third parties, involving the use of deception to obtain an unjust or illegal advantage”.

The TI-S Plain Language Guide defines fraud as: ‘The offence of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise). Countries consider such offences to be criminal or a violation of civil law.’

D 0602 The International Auditing Standards Board (IASB) of the Institute of Internal Auditors (IIA) defines fraud as: “any illegal acts characterized by deceit, concealment or violation of trust. These acts are not dependent upon the application of threat of violence or physical force. Frauds are perpetrated by parties and organisations to obtain money, property or services, to avoid payment or loss of services or to secure personal or business advantage”.

D 0603 The term is used to describe a whole range of activities such as deception, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Generally, however, fraud involves the intention to deceive a person or organisation in order to obtain an advantage, avoid an obligation or cause loss.

D 0604 Fraud is a criminal deception as it results in the fraudulent person gaining an unjust advantage or somebody else suffering a loss and the motivation for fraud very

often results from the human weakness in an attempt to satisfy psychological, sociological or economic needs.

- D 0605 An enlightened personnel policy can play an important role in fraud prevention as fraud is often the result of human failing in ensuring prudent personal financial management while the implementation of internal control which is sound in principle and effective in operation should reduce the possibility of fraud occurring.
- D 0606 While the existence of effective internal control may reduce the probability of misstatement of financial statements resulting from fraud and error or misappropriation of resources or breach of policies and procedures, there is always some risk of internal controls failing to operate as designed and unfortunately, any internal control may be ineffective against fraud committed by management, particularly if it involves collusion, internally or with third parties.
- D 0607 The greatest factor which might deter a person from committing fraud is the risk of discovery and possible punishment and since fraud begins with the temptation, the starting point in fraud prevention is to remove the sources of temptation.
- D 0608 GII shall adopt zero tolerance for fraud by placing strong emphasis on fraud prevention, which may reduce opportunities for fraud to take place and fraud deterrence, which could persuade individuals not to commit fraud because of the likelihood of detection and punishment.
- D 0609 The Board of Directors commits itself to creating a culture of honesty and ethical behaviour and in addition instituting an enlightened personnel policy, establishment of appropriate internal control, monitoring its effectiveness and the development of a Code of Ethics while taking appropriate disciplinary action in cases of non-compliance.
- D 0610 Management, and budget holders are responsible for the prevention and detection of fraud by ensuring that an adequate system of internal control exists within their areas of responsibility, and these controls operate effectively. As a result, there is a need for all managers to:
- a) identify and assess the risks involved in the operations for which they are responsible,
  - b) monitor for the existence of effective controls to prevent and detect fraud,
  - c) ensure compliance with controls developed by GII, and
  - d) ensure that agreed procedures are followed,
- D 0611 Every employee:
- a) has a duty to ensure that public funds, donor funds, GII's reputation and its assets are safeguarded.

- b) Should alert their line manager where they believe the opportunity for fraud exists because of poor procedures or lack of effective supervision.
  - c) has a responsibility to report details of any suspected or actual fraud, or any suspicious acts or events, to their Line Manager, Head of Department or the Chief Operating Officer.
  - d) must assist in any investigations by making all relevant information available and by cooperating in interviews.
- D 0612 Management shall investigate all cases of fraud thoroughly and institute appropriate disciplinary action against anybody found culpable.
- D 0613 Implementation of anti-bribery procedures is monitored as part of overall risk management and internal control processes. Periodic reviews of anti-bribery procedures are made and reported as part of governance and accountability processes.
- D 0614 GII has a zero-tolerance policy towards the giving and receipt of bribes, and of bribery and corruption in any form. GII aspires to operate to best practice standards and complies with all relevant laws in all the jurisdictions in which it operates. Employees and others who refuse to act unethically will be protected even when this might result in loss of business to GII.
- D 0615 This policy extends to all GII's dealings and transactions in all countries in which it or its consultants and associates operate. This policy underpins GII's anti-bribery programme, which is regularly revised to capture changes in corruption risk, law and best practice. All Trustees, members of the Advisory Council, employees, consultants and volunteers are required to comply with this policy.
- D 0616 GII undertakes periodic assessments of the bribery risks that it faces. On an annual basis the risk assessment together with key performance indicators is published on the GII website. The key areas of risk identified are:
- a) Gifts
  - b) Hospitality
  - c) Overseas travel
  - d) Receipt of donations
  - e) Conflicts of interest
  - f) Research activities
  - g) Appointment and activities of consultants

**D 0700 ANTI-BRIBERY POLICY**

- D 0701 The Board of Directors and management are committed to and oversee the implementation of a policy of zero-tolerance, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability and undermines organisational effectiveness.
- D 0702 Bribery Risk Assessment is an integral part of the organisation’s overall and on-going risk management process.
- D 0703 GII shall implement and maintain robust procedures which are proportionate to the risks and to the size, resources and complexity of the organisation.
- D 0704 GII assesses the bribery risk associated before entering into partnership or contracting arrangements with other entities and then carries out periodic due diligence based on that risk assessment.
- D 0705 Partnership or contractual arrangements are checked to ensure that these organisations have policies and procedures which are consistent with GII’s own procedures.
- D 0706 Code of Conduct

The vision of TI-Ghana is “a corruption-free society where all people and institutions act accountably, transparently, and with integrity.” The mission of TI-Ghana is “to fight corruption and promote good governance in the daily lives of people and institutions by forging strong, trusting and effective partnerships with government, business, and civil society and engaging with the people.”

This Code of Conduct for the Board members, and staff of Transparency International Ghana (TI-Ghana) reflects our commitment to these principles. The Code is founded on our Mission, Vision, and Values and serves as a guiding framework to ensure ethical conduct, accountability, and transparency in all our activities. It is designed to govern the behaviour of all individuals associated with TI-Ghana, ensuring that their actions enhance the credibility and integrity of the organisation.

Proviso: The Code of conduct for Transparency International Ghana set out values, principles and standards of acceptable ethical behaviour and conduct. Such codes are important pillars for the entrenchment of good governance principles and are used to combat corruption, enhance public confidence, public accountability and integrity for our staff and stakeholders. Chapter 24 of the 1992 Constitution of the Republic of Ghana requires public officers to avoid unethical behaviour or conduct, such as conflicts of interest, illicit enrichment and other improper conduct. As an institution that demand accountability and transparency from public service it is incumbent that all staff working with TI-Ghana reflect the highest ethical codes.



Transparency International Ghana (TI-Ghana) commits to the following principles:

#### 1. STAFF RELATIONS

- We will treat each other and those with whom we work with respect and consideration, being sensitive to our diversity, including in terms of cultural background, gender, religion, disability, family status, sexual orientation, etc.
- We commit ourselves to working individually and collectively with all stakeholders to catalyse and strengthen a social organisation for a Ghana in which government, politics, business, civil society, and the daily lives of the people would be free of corruption.
- We will communicate and consult with each other openly and collegially and in a manner that assists each of us to fulfil our duties and responsibilities faithfully and efficiently.
- We will respect the privacy and private lives of our colleagues when dealing with personal information.
- We undertake to ensure adequate consultation with any staff member before making any decision, which may impact upon that staff member.

For detailed information on our Code of Conduct, please refer to our official documentation available through TI-Ghana's resources.

**SECTION E**  
**OFFICE PRACTICE**

**E 0100      OFFICE HIERARCHY**

E 0101      The Executive Director is the Chief Disciplinary Officer and shall have authority over all employees and act in all cases of discipline in line with the directive of the Board of Directors and may query an employee in respect of any act or omission that, in the view of the Executive Director, warrants formal explanation.

E 0102      The Executive Director is accountable and responsible to the Board of Directors while all other employees are accountable and responsible to him or her.

E 0103      The Programmes Manager, the Accounts Manager, the Funds Raising Manager shall report directly to the Executive Director while other employees shall report directly to their respective Heads of Department or Units.

**E 0200      RESOURCE MANAGEMENT**

E 0201      The Secretariat shall be managed in such a way as to ensure the most effective and efficient use of all GII resources to achieve value added and the responsibility for this exercise lies with the Executive Director who is the principal Technical and Administrative Head of the GII Secretariat and the Chief Executive Officer.

E 0202      The use of GII property shall as much as possible be restricted to official purposes only and an employee who handles GII properties while they are under his or her control is not permitted to use them for personal reasons.

- E 0203 An employee shall be wholly and severally responsible for the safe custody of all properties of GII entrusted to his or her care and for the proper utilisation of all such properties.
- E 0204 An officer leaving the office after work shall ensure that all electrical items are switched off
- E 0205 The use of stationery shall be closely controlled to avoid wastage.
- E 0206 Appropriate maintenance culture shall be enforced to ensure that all properties of GII are kept in good shape and in position to over value for money services at all times
- E 0207 As much as possible, all assets of GII shall be insured against loss and marked with GII identification marks.

**E 0300 HEALTH AND SAFETY POLICY**

- E 0301 GII considers safe working conditions as of primary importance and GII shall maintain a healthy and safe working environment conducive for maximum performance by employees.
- E 0302 Employees shall enjoy all the health benefits contained in the Manual of Terms and Conditions of Employees.
- E 0303 An employee is expected always to be conscious of his or her personal safety and the safety of properties of GII at all times, takes steps to protect his or her personal safety and the properties of GII and report any suspicious or unsafe circumstance bordering on his or her safety or the safety of a colleague or safety of the properties of GII to the Executive Director without delay.
- E 0304 Fire extinguishers shall be installed at the premises and vehicles of GII and the fire extinguishers shall be maintained according to the schedule of maintenance.
- E 0304 Smoking shall not be allowed on the premises or vehicles of GII.

**E 0400 SECURITY POLICY**

- E 0401 The security shall ensure the protection and security of GII employees and properties, and the security personnel is authorised to search, detain, seek explanation, restrain entry or exit any employee within, leaving or entering the precincts of GII.

E 0402 Security system shall be arranged in such a way as to provide 24-hour security coverage for the premises of GII and access to the premises during out of office hours by non-officials shall not be allowed.

E 0403 There shall be two sets of keys for the office premises and the vehicles with one set of keys kept with the Executive Director and another set of keys kept at Head of Accounts.

## **E 0500 INTER-PERSONAL RELATIONSHIPS**

### **E 0501 *General Policy***

E 0502 GII is committed to the pursuance of its objectives in an environment which is supportive of its employees, and this means that all persons working at GII are treated fairly and equally, regardless of sex, age, ethnicity, physical impairment, religion and creed.

E 0502 GII believes that all employees of GII have the right to a workplace free from exploitation, harassment, discrimination or any other form of hindrance to the effective execution of their duties and as much as the right of every employee of GII to freedom of expression and association is permissible, these actions ought to be free from bias and harassment

E 0503 GII is committed to a working environment that is free of discrimination or intimidation and any form of discrimination, intimidation, harassment of abuse based on sex, age, ethnicity, physical impairment, religion and creed shall be deemed to be contrary to the ideals of GII.

E 0504 All members, Board members, employees and third parties acting on behalf of GII shall respect the rights of others and shall refrain from any activity that corresponds with those described in this section of this document and GII shall not tolerate behaviour among members of the GII community which creates an unacceptable working environment

### **E 0505 *Sexual Harassment Policy***

E 0506 GII recognizes its responsibility to all employees to maintain a working environment free from sexual harassment and GII ensures that all employees are made aware that sexual harassment is prohibited by GII and informs all employees of their right to report sexual harassment and to be free from intimidation.

- E 0507 All employees are informed that violation of this sexual policy constitutes a punishable offence which shall lead to disciplinary action, up to and including termination of employment.
- E 0508 It is within the context of the general policy on inter-personal relationships that GII considers the occurrence of sexual harassment to be an issue for particular attention and since sexual harassment subverts the vision, mission and core values of GII, it is considered a serious offence and shall not be countenanced by GII.
- E 0509 Sexual harassment very often occurs within a situation of unequal power between parties and therefore any policy must consider the power inequities within which any form of harassment is alleged to have occurred.
- E 05010 While sexual harassment most often takes place in situations of power differential between the persons involved, GII also recognizes that sexual harassment may occur between persons of the same status
- E 0511 Sexual harassment is especially serious when it threatens relationships between supervisor and subordinate and in such situations, sexual harassment exploits unfairly the power inherent in the supervisor's position and through wage increases, promotion and the like, a person in a position of power can have a decisive influence on the future of the employee.
- E 0512 Sexual harassment is of particular concern to GII because it:
- a) Is discriminatory in nature and is forbidden by the laws of the 1992 Republican Constitution of Ghana,
  - b) Harms the health and general wellbeing of its victims,
  - c) Could create a hostile and stifling environment which may run counter to the realization of the goals of GII,
  - d) Could affect the interest and work performance of employees, and
  - e) Could affect one's appointment, promotion and access to any package offered by GII to employees,
- E 0513 For the purposes of this policy, "sexual harassment: is defined a: "Inappropriate and unwelcome sexual advances, requests for sexual Favors and other verbal or physical conduct of a sexual nature, whether on a one-time basis or a series of incidents that might cause offence, humiliation, awkwardness or embarrassment or that might reasonably be conceived as placing a condition of a sexual nature on employment, opportunity for promotion or other advantage. Harassment is considered to have occurred if:
- a) Submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment or

- b) Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual or
- c) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or
- d) Creating an intimidating, hostile or offensive working environment".

E 0514 Sexual harassment includes but not limited to the following:

- a) Verbal, physical, written or pictorial communication relating to gender or sex which has the purpose or effect of unreasonable interference with an individual's performance, or which creates a hostile, offensive or intimidating atmosphere for recipient.
- b) Unwelcome and irrelevant comments, references, gestures or other forms of personal attention which are inappropriate to employment, and which may reasonably be perceived as sexual overtures or denigration.
- c) A request for sexual favours when submission to or rejection of such a request might reasonably be viewed as a basis for evaluation decisions affecting an individual's future.
- d) Abuses of power relations such that individuals receive unfair treatment based on gender or sexuality.
- e) Threat or coercion of sexual relations, sexual contact which is not freely agreed to by both parties including rape.

E 0515 Many of the listed factors are subject to interpretation and while overt forms of sexual harassment shall usually be obvious, more subtle forms may be difficult to recognize and perpetrators their behaviour is "unwelcome" or inappropriate.

E 0516 Conducts which are acceptable to some people may be offensive to others and any conduct which leads to the sexual harassment of another person is not acceptable and shall render the individual responsible liable to disciplinary action.

E 0517 In all cases, the point of view of the complainant and not the intention of the perpetrator shall guide the decision as to whether a reported incident amounts to sexual harassment or not.

E 0518 Sexual harassment at GII shall not be tolerated in any form and a GII employee who perceives himself or herself to have been sexually harassed or obtains knowledge of an incident of sexual harassment occurring within GII involving employees or non-employees is encouraged not to ignore the situation or the offending person but report the incident.

- E 0519 Such a report shall be made required to the Executive Director or Board Chairperson or any Board member and the complaint may be made initially in either verbal or written form, but written complaints shall be preferable, and all matters related to such cases shall remain confidential.
- E 0520 In making a formal complaint, the complainant shall submit in writing details of the alleged harassment, indicating time, place, date, how it happened and names of witnesses (if any), and the complainant may also indicate the type of remedy he or she seeks.
- E 0521 GII does not intend this policy to otherwise discourage group socialization of friendships or social activities among employees.

**E 0600            COMMUNICATION**

- E 0601 All official communications shall be addressed to the Executive Director and all official communications going out of the Secretariat shall either be signed by the Executive Director or signed on behalf of the Executive Director by a Responsible Official designated by the Executive Director
- E 0602 There shall be kept afloat file which shall contain copies of all official correspondences going outside the Secretariat and the file shall be circulated among the management staff on a weekly basis, and there shall be space for any management staff who reads the file to sign his or her signature.
- E 0602 The Programmes Manager and Communication person are the only officers authorised to make official verbal communication with the outside world, all others will have to receive explicit permission from the Executive Director before speaking on behalf of GII.
- E 0603 Where an official verbal communication with the outside world is made by the Programmes Manager or without the prior knowledge of the Executive Director a report shall be made to the Executive Director at the earliest convenience of the officer making the official verbal communication with the outside world
- E 0604 Under no circumstances shall an employee who comes by official information not meant for public consumption disclose that information to anybody outside the Secretariat, and in case of doubt, clearance should be sought from the Executive Director
- E 0604 At all times, as much as possible, there shall be somebody at the Reception Desk to receive visitors and take telephone calls and under no circumstances shall the telephone at the Reception Desk be made to ring more than two times before the call is answered.

**E 0700            INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)**

E 0701            GII shall encourage the use of IT services to share information and knowledge in support of GII’s mission.

E 0702            Computers form the basis of the information technology application within GII and GII shall acquire, develop and maintain computers, computer systems, networks and information resources and provide these resources to the employees and it shall be the responsibility of every employee allocated a computer to use and take good care of it in such a manner as to enhance the work of GII.

E 0703            The ICT policy shall ensure the confidentiality, integrity and availability of information systems operated by GII as well as the confidentiality and the security of all data on those systems and shall seek to:

- a) Provide reliable and uninterrupted IT services,
- b) Protect the confidentiality of data and privacy of its users, to the extent required or allowed under government laws,
- c) Safeguard the integrity of data and IT resources,
- d) Maintain availability of IT resources within a reasonable time frame,
- e) Manage the systems such that the systems can recover effectively and efficiently from disruption,
- f) Protect GII’s assets including data, software and hardware,

E 0703            All computers shall have an anti-virus always installed on them and the use of computers shall be done in such a way as to prevent GII being subjected to cyber fraud

E 0703            The use of external devices like pen drives and external modems shall be limited to officially certified ones; and

E 0704            All computers shall be inspected and serviced regularly to avoid compromising their use and they shall never be used without virus screening.

**E 0800            MAILING SYSTEM**

E 0801            All in-coming mails except marked “personal”, “private” or “confidential” shall be received by the Front desk Officer and opened by the Administrative Assistant and entered in an in-coming mail book for onward transmission to the Executive Director.

E 0802            All out-going mails shall be entered in the out-going mail book by the Front Desk Officer and dispatched as appropriate.



E 0803 Where an out-going mail is dispatched by hand, the details of the mail shall be entered in a mail dispatch book and the recipient made to sign for the envelope or the parcel.

E 0804 Copies of all out-going mails shall be put on the float file.

E 0805 Under no circumstances shall private or personal mail be dispatched at the expense of GII

**E 0900 TELEPHONE**

E 0901 Telephone calls shall be restricted to only official duties and officers are expected to exercise due diligence in the use of the telephone.

E 0902 The Accounts Manager shall examine telephone bills for private or personal calls and the officers involved charged appropriately.

E 0903 As much as is within the power of GII, staff will be provided with basic mobile phones to ensure effective communication and return of calls even when outside the office.

E 0904 As much as possible, officers shall be encouraged to communicate with Board members using their mobile phones to enable call back to be made in case calls made are not picked up.

**E 1000 PUBLICATIONS**

E 1001 As much as possible every official publication shall have the approval of the Board of Directors.

E 1002 As much as possible every official publication shall bear the name and the logo of GII at the cover page of the publication.

**E 1100 MINUTES OF MEETINGS**

E 1101 Minute of all proceedings of every meeting shall be taken and shall be signed by the chairman and recorder of the minute.

E 1102 Copies of every minute taken at a meeting shall be sent to all persons entitled to attend that meeting within a month of that meeting by the Executive Director.

**E 1200 LIBRARY**

E 1201 The Library shall keep copies of all GII publications, research work, float files, speeches and lectures delivered at all GII functions, albums with pictures depicting

past events, video clips, TI-S and TI Chapters publications and other relevant publications on corruption and good governance published by other organisations and individuals.

E 1202 The Library shall be accessible to outside researchers with prior written approval from the Executive Director

**E 1300 FILING SYSTEM AND CLASSIFIED INFORMATION**

E 1301 Appropriate filing system, be it electronic or manual, shall be kept of all records of GII bearing in mind the safety of the documents, the confidentiality of the documents and efficient retrieval of the documents.

E 1302 Classified documents include minutes of meetings, committee decisions, discussions of official gatherings, documents meant for archives and official information meant to be communicated to those concerned by scheduled officers.

E 1303 Proceedings and actions from meetings are committed to those concerned by the secretary to avoid the distortion of information and decisions from such meetings shall be the properties of the members unless where significant others may benefit from the communications.

E 1304 Classified information shall not be made public unless one is officially authorised to do so and appropriate disciplinary action shall be taken against an employee who divulges classified information without the necessary authorisation.

**E 1400 TRAVEL AND TRANSPORTATION**

E 1401 Official permission shall first be sought by any officer wishing to travel out of Accra, whether on official duties or not, from his or her superior officer.

E 1402 The Executive Director shall inform the Board Chairperson at any time he or she is traveling outside the country whether on official or unofficial duties.

E 1402 Where an official is on leave and wishes to travel outside the country, the officer shall inform his or her superior officer.

E 1404 All vehicles shall only be driven by the certified driver(s) of GII except where a vehicle is officially allocated to a particular officer.

E 1405 Every driver and every officer officially authorised to drive a GII vehicle shall be expected to always obey all safety rules and all traffic regulations.

E 1406 All vehicles shall have vehicle logbooks which shall be correctly always completed and regularly inspected by the Accounts Unit.

E 1407 All vehicles shall be comprehensively insured, have road worthy certification and carry a first aid kit and a fire extinguisher on board.

E 1408 The use and maintenance of vehicles shall be done in accordance with the manufacturer's instruction.

## **SECTION F**

### **PROGRAMMES AND PROJECTS POLICY**

#### **F 0100 PROGRAMMES AND PROJECTS**

F 0101 GII shall endeavour to pursue and implement programmes and projects which shall be in line with its core activities, and which shall enhance its core values and achievement of its vision and mission.

F 0102 GII shall be open to collaboration and cooperation with other persons and institutions to implement programmes and projects which meet its acceptable criteria.

F 0103 GII shall endeavour to successfully complete all programmes and projects it embarks upon within budget, time and other specifications and meet timely reporting deadlines to sponsors.

## **SECTION G**

### **ACCOUNTING AND FINANCIAL POLICIES**

#### **G 0100 ACCOUNTING POLICY**

G 0101 The accounting policy put in place by the Board of Directors shall be to implement an accounting system that shall provide for the immediate and prompt recording of all transactions, assembly of accounting information and appropriate analyses to enable financial statements which show true and fair view of the financial position, changes and cash flows to be prepared in accordance with the Companies Act, 2019 Act 992 and the International Financial Reporting Standards (IFRS) and to meet all reporting deadlines.

G 0102 The accounting system establishes methods and the keeping of proper records that shall:

1. Ensure that all valid transactions are identified captured and recorded, and that all transactions are properly authorised before being allowed to proceed and any initial recording must be because of an external event or document being created.
2. Allow transaction to be described in sufficient details so that it is properly classified for financial reporting purposes, and this is done on a timely basis.
3. Translate transaction into monetary measures accurately to allow financial statements items to be stated in monetary values.
4. Determine the time in which transaction occurs to permit proper recording as well as the adequate disclosure in the appropriate accounting period and related financial statements.
5. Ensure that information is properly processed without any loss, or it being corrupted.
6. Permit proper safeguards of accounting records and assets of the entity and maintenance of both standing data and transaction data.

Standing data is data of a permanent or semi-permanent nature like wages rate, price list which is held on files and used constantly during processing while transaction data on the other hand refers to one off data such as total hours worked, or quantity of items sold to a customer.

G 0103

The accounting system shall:

1. Communicate to management, at any point in time, the results of decisions and actions taken in the past by management; and
2. Predict with reasonable degree of certainty, based upon certain underlying assumptions, the possible future results of management's present-day decisions and actions, or conversely, help management to take certain decisions and actions which can lead to the achievement of future objectives.
- 3.

**G 0200**

**FINANCIAL POLICY**

G 0201

GII financial policy shall among others:

1. Recognise the fact that GII relies on solicited funds for its activities and there shall be the need to judiciously make use of the funds and put in place an appropriate reporting system to ensure proper accountability of those funds in line with the programmes the funds are meant for.
2. Ensure that funds shall be solicited from individuals and institutions who subscribe to the core values of GII.
3. Ensure the prudent use of resources and GII properties.

# APPENDIXES

## APPENDIX TO BE COMPLETED

1. **Organogram**
2. **Job Descriptions of employees**
3. **Membership Application Form**
4. **Membership Policy**
5. **Employment Application form GII 101 – B 0501**
6. **Applicant Interview Assessment Form GII 102 – B 0502**
7. **Standard Status Form GII 103 – B 0901**
8. **Merit Assessment Form (Form GII 104 – B 2701**
9. **Board Member Declaration of Interest Form**
10. **Board Member Commitment Form**
11. **Board Member Evaluation Form**