



SOP

Grievance Mechanism and Whistleblowing

DOCUMENT CONTROL

FILE NAME: hr-sop-005-UoF-v1.0.docx
AUTHOR Kwabena Kan-Dapaah
REVIEWED BY Emmanuel Baah
APPROVED BY Kwabena Kan-Dapaah
TYPE Procedure

FILE ID: hr-sop-005
VERSION: 1.0
EFFECTIVE DATE: 20.Jan.2025
STATUS: DRAFT

Document ID: HR-SOP-005

Version History

Ver.	Date	Author(s)	Summary of Changes	Reviewed By	Approved By	Status
1.0	03/10/25	HR Assistant	Initial draft of the SOP	Supervisor	Dept. Head	Approved

1 Introduction & Philosophy

This procedure establishes a fair, accessible, and transparent system for addressing complaints from both external parties and internal personnel, in line with ICoCA's expectations for accountability and remedy.

1.1 Policy Statement & Purpose

Offin Security Services Limited is committed to operating with the highest standards of integrity, accountability, and respect for human rights, in accordance with Ghanaian law and the International Code of Conduct for Private Security Service Providers (ICoC) -6.

This policy aims to:

- Provide clear definitions of grievances, improper conduct, and illegal conduct.
- Establish safe, accessible, and multiple channels for reporting concerns.
- Explicitly prohibit any and all forms of retaliation against personnel who submit reports in good faith.
- Ensure all reports are investigated fairly and resolved promptly.

1.2 Guiding Principle

As private security officers in Ghana, our authority is derived from the laws of Ghana and the specific rights granted by our clients. We do not possess the same powers as the Ghana Police Service.

- Ghanaian Law: Our actions are governed by the Constitution of Ghana,
 - the Criminal Offences Act, 1960 (Act 29), and any other relevant legislation, including regulations specific to the private security industry.
 - Police Service Act, 1970
 - Police Service (Private Security Organisations) Regulations 1992 Legislative Instrument 1571 (No online source available)
- Limits of Authority: Our primary role is to observe, report, and deter. The use of force is only permissible in specific circumstances, primarily in defense of oneself or others against an imminent threat of bodily harm.

1.3 Scope:

This SOP is applicable to all Manned Guards and Personnel, Ghana Operations

1.4 Definitions:

For this policy, the following definitions apply:

- **Grievance:** A complaint raised by personnel relating to their individual employment conditions, workplace relationships, or the work environment. This includes, but is not limited to, disputes over pay, hours, rostering, or interpersonal conflicts with colleagues or supervisors.
- **Improper Conduct:** Conduct that violates this policy, the company's Code of Conduct, or established professional standards, but may not necessarily be illegal. This includes:
 - Breaches of company policies (e.g., on use of force, data protection, or hospitality).
 - Bullying, harassment, or discrimination.
 - Unprofessional behavior that damages the company's reputation.
 - Conflicts of interest.
 - Actions that endanger the health, safety, or human rights of colleagues or members of the public.
- **Illegal Conduct:** Any act or omission that violates Ghanaian law. This definition is aligned with the broad concept of "impropriety" under Ghana's Whistleblower Act, 2006 (Act 720) -1, and includes:
 - Corruption, such as bribery, embezzlement, or fraud.
 - Economic crimes and misappropriation of resources.
 - Theft or damage to property.
 - Violence or threats of violence.
 - Dangers to public health or safety, or environmental damage.
- **Good Faith Report:** A report made with an honest belief in the truth of the information, without malice or knowledge of its falsehood. Personnel are protected from liability provided they did not knowingly make a false disclosure with malicious intent

1.5 Roles and Responsibilities

- *HR/OPS Department:*
Coordinate the implementation process, provide forms, schedule review meetings, and maintain records.
- *Supervisor:*
Conduct the training and enforces implementation.
- *Department Head:*
Review and approve the supervisor's recommendation.

2 Strict Prohibition of Retaliation

Offin Security Services Limited strictly prohibits any form of retaliation against any personnel who submits a grievance or report in good faith. Retaliation is a serious violation of this policy and will result in disciplinary action, up to and including dismissal.

- *Retaliation includes, but is not limited to:* dismissal, suspension, denial of promotion, involuntary transfer, harassment, intimidation, threats, or any other adverse action.
- Personnel who believe they have been subjected to retaliation can file a complaint directly to the Commission on Human Rights and Administrative Justice (CHRAJ), which has the authority to order retaliatory actions to stop.
- The company will fully comply with any orders from CHRAJ or other competent authorities regarding whistleblower protection.

3 Reporting and Grievance Mechanisms

Multiple, accessible channels are available for personnel to raise concerns. The company will make all reasonable efforts to maintain the confidentiality of the reporter, within the needs of a fair investigation.

Table 1 below outlines the recommended reporting channels for different types of concerns:

Table 1: Reporting Channels.

Concern Type	Internal Channel	External & Legal Channels
Grievances (e.g., pay, hours, interpersonal issues)	Direct Supervisor -> HR Department -> Head of Operations	Labour Commission
Improper Conduct (violations of company Code)	HR Department -> Integrity Hotline -> Head of Operations	Not applicable
Illegal Conduct (corruption, theft, violence)	Integrity Hotline -> Head of Operations	CHRAJ, Police, Ghana Anti-Corruption Coalition (GACC)

- **Internal Reporting Channels:**
 - Direct Supervisor: For routine grievances.
 - HR Department: For all personnel-related matters.
 - Dedicated Integrity Hotline/Email: A confidential channel (e.g., a phone number and email managed by a designated Integrity Officer) for reporting sensitive issues, especially improper or illegal conduct.
 - Head of Operations: For escalation if other channels are unresponsive or inappropriate.
- **External Reporting Channels:**
 - As provided under Ghanaian law, personnel may directly report to several external bodies, including -1:
 - Commission on Human Rights and Administrative Justice (CHRAJ): The primary agency for whistleblower protection. Can provide legal assistance and order retaliation to stop.
 - Ghana Anti-Corruption Coalition (GACC): Provides resources and advocacy.
 - Police, Attorney-General, or a Member of Parliament.

4 Procedures for Handling Reports

- **Acknowledgment:** All reports will be acknowledged within 3 business days.

- *Assessment & Investigation:* Reports will be reviewed to determine the appropriate course of action. Investigations will be conducted by impartial persons with the necessary expertise. Ghana's Whistleblower Act mandates investigations be completed within 60 days, a standard this policy aspires to meet.
- *Resolution & Follow-up:* Findings will be documented, and appropriate corrective actions will be taken. The reporter will be informed of the outcome to the extent possible without violating confidentiality or legal restrictions.
- *Record Keeping:* Secure records of all reports, investigations, and outcomes will be maintained in compliance with data protection principles.

5 Protection and Support for Whistleblowers

In addition to protection from retaliation, personnel who report illegal conduct may be eligible for:

- *Police Protection:* If their life or property is endangered due to the disclosure, they can seek police protection as per the Whistleblower Act -1-2.
- *Legal Aid:* CHRAJ can refer victimized whistleblowers to the Legal Aid Board for assistance.
- *Compensation:* Victimized whistleblowers can seek compensation through the High Court.

6 Training and Awareness

All personnel will receive regular training on this policy, the company's Code of Conduct, and their rights and responsibilities under Ghanaian law. This will include practical guidance on how to use the reporting mechanisms.

File ID	Purpose
HR-MAN-001-UoF	Training manual

7 Contact Information

- *Company Integrity Hotline:* [Insert Phone Number]
- *Company Integrity Email:* [Insert Email Address]

- **CHRAJ:**
 - Address: Old Parliament House, High Street, Accra
 - Tel: (+233) 302 662 150
 - Email: info@chrajghana.com | chrajghana.com
- **Ghana Anti-Corruption Coalition (GACC):**
 - Tel: (+233) 302 230 483
 - Email: info@gaccgh.org

8 Forms

File ID	Purpose
HR-FOM-005-GMW	Post Probation Evaluation FORM