



Commission on Human Rights  
And Administrative Justice  
CHRAJ, Ghana

Twenty-seventh Annual Report  
2020



The Rt. Hon Speaker of Parliament  
Parliament House  
Accra

Mr. Speaker,

In accordance with the provisions of Article 218 (g) of the 1992 Constitution, and Section 7 (1) (h) of the Commission on Human Rights and Administrative Justice Act 1993 (Act 456), I am pleased to present the Twenty-seventh Annual Report of the Commission for the period January 1 to December 31, 2020.

Yours sincerely,

**Joseph Whittal**  
Commissioner

## Commission Members



Joseph Whittal, Commissioner



Richard Quayson, Deputy Commissioner



Mercy Larbi, Deputy Commissioner

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## LIST OF ACRONYMS

AAACA	Association of Anti-Corruption Agencies in Commonwealth Africa
AC	Ant-Corruption
ACHPR	African Commission on Human and People's Rights
AJ	Administrative Justice
AOMA	African Ombudsman and Mediators' Association
APR	Annual Progress Report
ARAP	Anti-Corruption, Rule of law and Accountability Programme
AU	African Union
AWP	Annual Work Plan
CAACC	Commonwealth Africa Anti-Corruption Centre
CHRAJ	Commission on Human Rights and Administrative Justice
CPRs	Civil and Political Rights
ECOSOC	Economic, Social and Cultural Rights
GANHRI	Global Alliance of National Human Rights Institutions
HR	Human Rights
IAACA	International Association of Anti-Corruption Authorities
ICC	International Coordinating Conference
IOI	International Ombudsman Institute
IPs	Implementing Partners
KPs	Key populations
LGB/TIGNC	Lesbian, Gay, Bisexual/Transgender, Intersex and Gender Non-Conforming
MDAs	Ministries, Departments and Agencies
MMDAs	Metropolitan, Municipal, and District Assemblies
MONICOM	Monitoring and Evaluation Committee
OHCHR	Office of the High Commissioner for Human Rights
OPCAT	Optional Protocol on the Convention Against Torture
NACAP	National Anti-Corruption Action Plan

NACIWA Network of African Anti-Corruption Institutions in West Africa  
NANHRI Network of African National Human Rights Institutions  
NHRIs National Human Rights Institutions  
NGOs Non-Governmental Organisations  
NNHRI-WA Network of National Human Rights Institutions in West Africa  
PLHIV Persons Living with HIV  
PIT Project Implementation Team  
PSRRP Public Sector Reform for Results Project  
PWAs Persons with Albinism  
SDGs Sustainable Development Goals  
SOGIE Sexual Orientation, Gender Identity and Expression  
UNCAC United Nations Conventions Against Corruption  
WAPCASS West African Project to Combat AIDs and STIs

## THE COMMISSIONER'S MESSAGE

It is with great delight that I present the 27th edition of the Commission's 2020 Annual Report to the Parliament of Ghana.

The Commission maintained momentum in the promotion and protection of fundamental human rights, ensuring good administrative practices and combating corruption; in the midst of the Coronavirus Disease (COVID-19) pandemic and its accompanying fear, lockdown and restrictions. The Commission made progress in investigating and resolving complaints within all its three mandates.

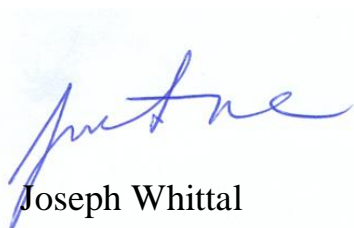
The implications of the COVID-19 on the political, civil, economic, social, and cultural rights of the citizenry and other persons living in Ghana were enormous. However, the Commission took steps to ameliorate some of these effects by issuing advisories to relevant institutions such as the Electoral Commission and the National Identification Authority to comply with the COVID-19 protocols in the registration and electioneering exercises. The Security agencies were also cautioned on the handling of citizens in the enforcement of the COVID-19 restrictions.

The Commission further instituted nationwide sensitization programmes on anti-stigmatization and non-discrimination of COVID-19 victims. This contributed to promoting public confidence and encouraging support for victims in the communities.

The Commission remained resolute in the pursuance of fairness and justice by public officials and public institutions and upheld the avoidance of discrimination and arbitrariness in public services.

The Commission also continued with its fight against corruption at the individual and institutional levels. It encouraged organizational mechanisms to prevent corrupt practices and urged timely report of any act of corruption.

The Commission is poised to achieve much with enhanced resources and is grateful to the invaluable staff for their commitment and support.



**Joseph Whittal**  
**Commissioner**



## 2020 HIGHLIGHTS

The strategic goals of the Commission that are drawn from the three thematic mandate areas (human rights, administrative justice, and anti-corruption) as well as the operational/functional mandate areas such as investigations, administration, research, public education, legal services, and finance, have guided the CHRAJ 2019 programme implementation and reporting.

The Commission received eight-thousand and seven (8,007) complaints in 2020 as against eight thousand eight hundred and fifty-nine (8,859) complaints in the previous year 2019 showing a decrease of 9.6%.

Seven- thousand five hundred and sixty-five (7,565) complaints which represent 94.5% of complaints received were resolved. Complaints resolved were lower than the previous year's figure of 8,851 by 14.5%.

### Classification of Complaints

The total complaints received and resolved were classified into Human Rights, Administrative Justice and Corruption respectively. See the table below for details.

*Table 1: Classification of Complaints According to Mandate Areas*

Classification	Total Complaints	Percentages of Complaints	Complaints Resolved	Percentage Resolved
Human Rights	7,543	94.2%	7,272	96.1%
Administrative Justice	304	3.8%	272	3.6%
Corruption	160	2.0%	21	0.3%
<b>Total</b>	<b>8,007</b>	<b>100%</b>	<b>7,565</b>	<b>100%</b>

## Human Rights

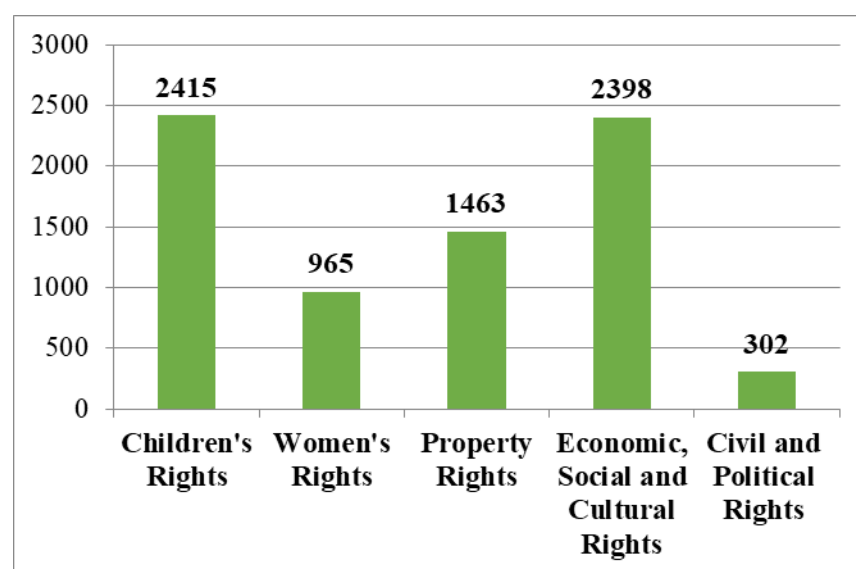
### ✓ Complaints Received and Resolved

Seven thousand five hundred and forty-three (7,543) human rights complaints were received whereas seven thousand and seventy-two (7,272) were resolved. The complaints received and resolved were lower than the previous year's figures of 8,379 and 8,445 by 10% and 13.9% respectively.

### ✓ Nature of Complaints

The nature of complaints received were categorised into Children's Rights, Women's Rights, Property Rights, Economic, Social and Cultural Rights and Civil & Political Rights related respectively. See the diagram below for the respective figures under each category.

*Fig 1: Category of Human Rights Complaints*



### Other activities implemented under this mandate included:

- 2,966 public education activities on human rights;
- COVID-19 anti-stigma campaign in collaboration with partners;

- Research on banishment and discrimination against persons with albinism (PWAs);
- National Baseline Assessment on Business and Human Rights;
- Commemoration of the International Day of Older Persons and the International Day of Persons with Disabilities;
- Assessment and observation of the right to vote during the 2020 presidential and parliamentary elections in Ghana.

## Administration Justice

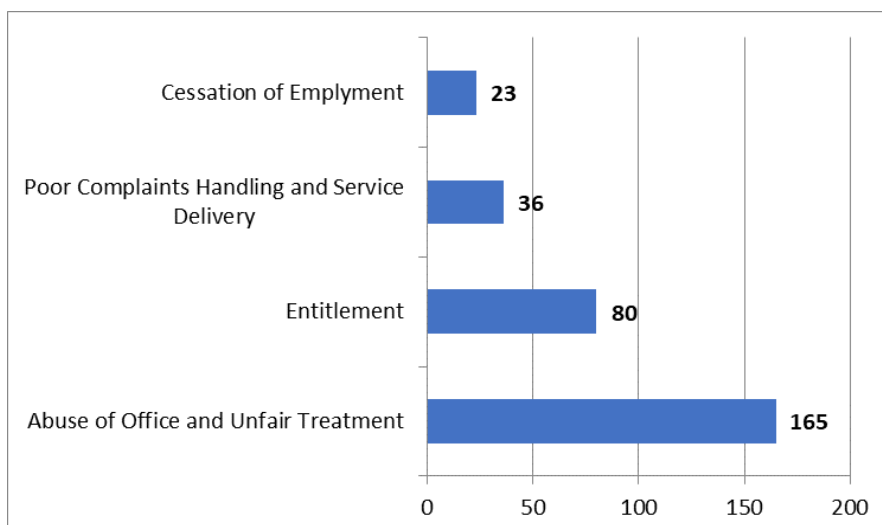
### ✓ Complaints Received and Resolved

The Commission received 304 and resolved 272 administrative justice complaints. Compared to the previous year, there was 26.6% and 26.5% decrease in complaints received and resolved respectively.

### ✓ Nature of Complaints

Administrative justice complaints were mainly on unfair treatment of individuals by public officers/abuse of office; entitlements; termination of employment; and poor handling of complaints and service delivery. See the diagram below for details.

*Fig 2: Category of Administrative Justice Complaints*



### ✓ Public Education

A total of 752 promotional activities were conducted across the nation under varied topics including; good administrative principles and maladministration.

### Anti-corruption

#### ✓ Reported and Investigated Cases

One hundred and sixty (160) cases were classified under anti-corruption mandate. This figure is higher than the 66 recorded in the previous year by 142.4%. Twenty-one (21) complaints were concluded as compared to 36 in the previous year. The astronomical increase in cases recorded was due to complaints regarding non-declaration of assets, brought against some Justices of the Superior Courts of Ghana. See the table below for details.

*Table 2: Nature of Cases*

NATURE OF CASES	NUMBER OF CASES
Bribery	11
Misappropriation of funds	3
Embezzlement	5
Extortion	10
Conflict of Interest & Abuse of Office	8
Fraud	4
Failure to Declare Assets	119
<b>TOTAL</b>	<b>160</b>

### **Other Activities Implemented under this Mandate Included:**

- 867 anti-corruption promotional activities on varied topical issues across the nation.
- Designation and training of 16 Ethics Officers drawn from all regional offices of CHRAJ across the nation towards strengthening their capacity to understand and appreciate ethics as a corruption issue.
- Preparation of 2019 NACAP Progress Reports. The Annual Progress Report 2019 prepared by the Monitoring and Evaluation Committee (MONICOM) under NACAP, was reviewed by the High-Level Implementation Committee and the MONICOM in July 2020.
- Provision of technical assistance to NACAP implementing partners (IPs) through sensitization programmes on NACAP towards deepening their understanding of specific roles under the plan.

### **Management and Administration**

The Commission ended the year 2020 with a reduced number of staff from 696 in 2019 to 693; comprising 464 males and 229 females.

### **International Cooperation**

The Commission, through working with international institutions, shares experiences and best practices on the thematic areas of human rights, administrative justice, and anti-corruption from Ghana's perspective, thereby contributing to strengthening many sister institutions<sup>1</sup> globally.

The Commission continues to enjoy 'A status' membership with the GANHRI; signifying its compliance with the Paris Principles. Again, the Commission remains as the African Representative on the GANHRI Working Group on the 2030 Agenda for Sustainable Development; and the Alternate member of the GANHRI Sub-Committee on Accreditation.

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<sup>1</sup> This includes National Human Rights Institutions (NHRIs), Ombudsman and Anti-Corruption Institutions

Moreover, the Commissioner of CHRAJ continues to serve as Chairman of the NANHRI Working Group on the Agenda 2030 and the Africa Agenda 2063; and also, President of the NNHRI-WA.

The activities in the international front included the following:

- Prepared and submitted an activity report to African Commission on Human and People's Rights (ACHPR) in 2020.
- Visited the South African Human Rights Commission and the Commission on Gender Equality in December 2020.
- Through the Secretariat of NNHRI-WA, monitored presidential and parliamentary elections in Burkina Faso, Ghana and Liberia in 2020.
- Submitted a research paper to the OHCHR in May 2020 on Stolen Asset Recovery and Human Rights.

## **Finance**

The Commission received a total of Thirty-Eight Million, Two Hundred and Fifty-Two Thousand, Eight Hundred and Fifty-Five Ghana Cedis, Ten Pesewas (GH¢38,252,855.10) for its operations during the year; representing 93.5% of total annual estimated budget of GH¢40,897,551.00.

## **PART ONE**

### **OVERVIEW OF THE COMMISSION**

#### ***1.1. Vision statement***

We envisage a society that is truly free, just and equitable; where human rights and human dignity are respected, where power is accountable, and governance is transparent.

#### ***1.2. Mission statement***

The Commission on Human Rights and Administrative Justice exists to enhance the scale of good governance, democracy, integrity, peace, and social development by promoting, protecting and enforcing, fundamental human rights and freedoms and administrative justice for all persons in Ghana.

This mission statement will be achieved by:

- Ensuring a culture of respect for the rights and responsibilities of all people in Ghana.
- Dispensing and promoting justice in a free, informal and relatively expeditious manner.
- Ensuring fairness, efficiency, transparency and application of best practices.
- Using a well-trained and motivated workforce and the most modern technology.

#### ***1.3. Mandates***

CHRAJ has triple thematic mandates comprising Human Rights, Administrative Justice and Anti-Corruption. Thus, the Commission is:

- a National Human Rights Institution;

- an Ombudsman; and
- an Anti-corruption Agency.

The Commission draws on the foregoing thematic mandates (human rights, administrative justice, and anti-corruption) as well as its operational/functional mandates such as investigations, legal services, research, public education etc., in the implementation of its programmes.

### **1.3.1. Human Rights**

**1.3.1.1.** Article 218 (a), (c) and (f) of the 1992 Constitution and Section 7(1) (a) (c) and (g) of the Commission on Human Rights and Administrative Justice Act, 1993 (Act 456) mandates the institution to protect universal human rights and freedoms relating to civil, political, economic, social and cultural rights and other International Human Rights instruments which Ghana has ratified. The Commission's human rights functions are divided into two broad categories:

- (i) Protection and Enforcement, and
- (ii) Promotion and Prevention.

**1.3.1.2.** In protecting and enforcing fundamental human rights CHRAJ investigates complaints of human rights violations by persons and institutions both private and public. The Commission resolves complaints through various methods - mediation, negotiation, and formal hearings and by instituting actions and proceedings in court. Additionally, the Commission carries out special investigations into human rights abuses that are systemic, cultural or other areas of public interest. In the course of investigations, the Commission conducts research, field investigations, as well as public hearings.

**1.3.1.3.** CHRAJ is mandated by Article 218 (f) of the 1992 Constitution to conduct public education programmes as part of fulfilling the function of promoting human rights. The Commission has the discretion to use a wide variety of methods including, mass media, publications, lectures, and symposia.



**1.3.1.4.** In order to prevent human rights abuses, the Commission assesses the observance of human rights situation, particularly of vulnerable persons. These monitoring visits ensure that the Commission can detect early warning signs of human rights abuses to prevent violations from taking place.

### **1.3.2. Administrative Justice**

**1.3.2.1.** The Administrative Justice function of the Commission replaces the office of the Ombudsman, which was created by the Ombudsman Act of 1970. This mandate is contained in Articles 218 (a) and (b) of the 1992 Constitution and Section 7(1) (a) and (b) of Act 456.

**1.3.2.2.** The Commission is mandated to protect and promote Administrative Justice to ensure that the government and its officers and all public services and officials are accountable and transparent. The Commission ensures that the administrative organs of the State provide equal access to employment and services and that they are administered fairly. In particular, this function of the Commission is to ensure that public officials avoid arbitrariness and discrimination in their decisions and actions. It also investigates “complaints concerning the functioning of the Public Services Commission, the administrative organs of the State, the Armed Forces, the Police Service and the Prison Service in so far as the complaints relate to the failure to achieve a balanced structuring of those services or equal access by all to the recruitment of those services or fair administration in relation to those services”-Article 218 (b).

### **1.3.3. Anti-Corruption**

**1.3.3.1.** The Commission’s Anti-Corruption powers are derived from Article 218 (a) and (e); 284-288 of the 1992 Constitution and Section 7(1) (a), (e) and (f) of Act 456. The Commission investigates and works to prevent corruption.

**1.3.3.2.** Under this mandate, the Commission:

- (i) Investigates abuse of power and “all instances of alleged or suspected corruption and the misappropriation of public monies by officials” (Article 218 (e));
- (ii) Investigates allegations of breaches of the code of conduct under Chapter 24 of the 1992 Constitution;
- (iii) Promotes integrity and ethics in the public service; and
- (iv) Conducts training and public education to sensitize public officials and the general public on corruption.

#### ***1.4. Functions of the Commission***

##### ***1.4.1. Original functions***

The functions of the Commission as set out in Section 7 of its enabling law, Act 456 pursuant to Article 218 of the 1992 Constitution are:

1.4.1.1 to investigate and remedy complaints arising from:

- violations of human rights and freedoms, injustice, corruption, abuse of power and unfair treatment of any person by a public officer in the exercise of his official duties;
- the functioning of the Public Services Commission, the administrative organs of the State, the offices of the Regional Coordinating Council and the District Assembly, the Armed Forces, the Police Service and the Prison Service in so far as the complaints relate to the failure to achieve a balanced structuring of those services or fair administration in relation to those services;
- practices and actions by persons, private enterprises and other institutions where those complaints allege violations of fundamental rights and freedoms under the 1992 Fourth Republican Constitution of Ghana; and

to take appropriate action to call for the remedying, correction and reversal of instances specified in paragraphs (a), (b), and (c) of this

subsection through such means as are fair, proper and effective, including:

- (i) negotiations and compromise between the parties concerned,
- (ii) causing the complaint and its finding on it to be reported to the superior of an offending person;
- (iii) bringing proceedings in a competent Court for remedy to secure the termination of the offending action or conduct, or the abandonment or alteration of the offending procedures; and
- (iv) bringing proceedings to restrain the regulation by challenging its validity if the offending action or conduct is sought to be justified by subordinating legislation or regulation which is unreasonable or otherwise ultra vires.

**1.4.1.2** to investigate allegations that a Public Officer has contravened or has not complied with a provision of Chapter 24 of the Constitution to wit Code of Conduct of Public Officers;

- all instances of alleged or suspected corruption and the misappropriation of public moneys by officials and to take appropriate steps, including reports to the Attorney-General and Auditor General resulting from such investigation.
- to educate the public as to human rights freedoms by such means as the Commissioner may decide, including publications, lectures and symposia;
- to deal with confiscated properties as provided by Section 35 (2) of the transitional provisions of the 1992 Constitution;
- to report annually to Parliament on the performance of its functions

### ***1.4.2. Additional Functions***

The Commission has been granted additional functions in subsequent legislation including:

**1.4.2.1** Office of the Administrator of Stool Lands Act, 1994 (Act 481)

Section 7 provides as follows:

“A beneficiary of stool land revenue aggrieved by the apportionment of the stool land revenue, may submit a complaint to the Commission on Human Rights and Administrative Justice.”

#### **1.4.2.2 Children’s Act, 1998 (Act 560);**

Section 48(2) provides that:

“The following persons may apply to a family tribunal for a maintenance order  
...(d) The Commission on Human Rights and Administrative Justice”

#### **1.4.2.3 The Juvenile Justice Act 2003 (Act 653);**

Section 42(2) provides that:

“...the Commission on Human Rights and Administrative Justice may visit and inspect any centre.”

#### **1.4.2.4 Human Trafficking Act, 2005 (Act 694);**

Section 6 of Act 694 provides as follows:

“A person with information about trafficking

(a) Shall inform the police, or

(b) The Commission on Human Rights and Administrative Justice...”

#### **1.4.2.5 Whistleblower Act, 2006 (Act 720).**

The Act confers additional mandate on the Commission to investigate disclosures of impropriety (economic crime, waste, mismanagement, misappropriation of public resources, environmental degradation) and complaints of victimization of whistleblowers.

Section 3(1) (h) provides as follows:

“Disclosure of impropriety may be made to any one or more of the following ... the Commission on Human Rights and Administrative Justice”.

Section 13(1) provides as follows:

“A Whistleblower who honestly and reasonably believes that that whistleblower has been subjected to victimisation or learns of a likely subsection to victimisation because a disclosure has been made, may in the first instance make a complaint to the Commission”

These enactments have broadened the power and authority of the Commission to improve and deepen the standards for promotion and protection of fundamental human rights and freedoms and to instil discipline and ethical and integrity behaviour and practices in public administration.

### ***1.5. Special Powers of Investigation***

The Commission may, for the purposes of performing its functions (Sec. 8(1)):

- issue subpoenas requiring the attendance of a person before the Commission and the production of a document or record relevant to an investigation by the Commission;
- cause a person contemptuous of a subpoena issued by the Commission to be prosecuted before a Court;
- question a person in respect of a subject matter under investigation before the Commission;
- require a person to disclose truthfully and frankly any information within the knowledge of that person relevant to an investigation by the Commission.

### ***1.6. Limitation on Powers of Investigation***

While no institution, body, or person in Ghana is excluded from the Commission’s mandate generally, the Commission has no power to investigate:

- A matter that is pending before a court or judicial tribunal;
- A matter involving relations between the government and any other government or international organisation; or

- A matter relating to the exercise of the prerogative of mercy.

### ***1.7. Structure of the Commission***

The Commission, based on its operational and thematic mandates currently has the following organisational structure:

#### **1.7.1. The Commission:**

The Commission is the governing body of CHRAJ. The Commission is made up of the Commissioner, who is the Chairman, and two Deputy Commissioners. The three (3) Commission members are responsible for taking strategic decisions that will drive the Commission towards achieving its mandate, which is expressed in its vision and mission statements. Constitutionally, CHRAJ is an independent body and must be so in both form and functions as shown in the governing council. The Commission Members are supported by Senior Management (Departmental Directors) and autonomous Units Heads who have direct responsibility for the departments and units within the Commission.

#### **1.7.2. Senior Management:**

This comprises Directors of the ten (10) departments of the Commission. The departments are:

- **Human Rights:** As a thematic mandate, this department promotes and protects the fundamental human rights and freedoms of Ghanaians through investigation, enforcement, public education, research.
- **Administrative Justice:** This department ensures that the government and public officials uphold the administrative justice provisions in the Constitution and are accountable and transparent.
- **Anti-Corruption:** This department investigates the abuse of power, corruption, conflict of interest situations, code of conduct of public officers, impropriety and complaints of victimization of whistle-blowers.

- **Research:** This department supports both the thematic and functional mandates by ensuring that research projects of the Commission are well coordinated, sustained and supported with the requisite concerted efforts and relevant documentation.
- **Public Education:** This department is responsible for awareness creation on the mandates of the Commission as well as generally educating the general public on their rights and freedoms.
- **Investigations:** As a functional mandate, the Commission is to investigate cases that fall within its mandate areas. This department is responsible for coordinating the investigation activities of the Commission, but focuses its energy on high-profile cases that come to the Commission.
- **Legal Services:** This department is responsible for enforcing the decisions that the Commission takes on cases. They go to court on behalf of clients to secure judgment as well as give legal advice on cases.
- **Human Resources and Administration:** This department is responsible for staff welfare, day-to-day operation of the office and logistics.
- **Finance:** This department takes care of the financial planning to support operations of the Commission, and meeting internal and external financial reporting obligations on the finances of the Commission.
- **Budget:** This department plans and prepares budgets for the Commission's activities.

### **1.7.3. Autonomous units:**

The autonomous units are:

- International Cooperation;
- Corporate Affairs and Communications;
- Programmes and Projects;
- Policy Planning, Monitoring and Evaluation;
- Procurement and Logistics ; and

- Technology and Innovation.

The Commission has its Head Office located in Accra; and 16 Regional Offices that coordinate the Commission's work in the 16 administrative Regions of Ghana. In addition, it has 2 sub-Regional and 94 District Offices across the country ensuring that services of the Commission are accessible by the ordinary person in Ghana.

This organisational structure provides an effective medium through which the Commission performs its statutory and constitutional mandates. In particular, the spread of 113 offices across the entire country ensures accessibility to all persons to the offices of the Commission as well as the services rendered by it.



## PART TWO

# STRATEGIC GOALS

Implementation of the programmes for the reporting year was guided by the goals of the Commission expressed under the three mandates: Human Rights; Administrative Justice; and Anti-corruption. This is achieved through the Commission's functional/operational departments and units as well as the regional and district offices across Ghana.

### *2.1. Human Rights Mandate*

#### **Strategic goal 1: promote and protect fundamental human rights and freedoms**

The Commission sought to improve public capacity to demand promotion, respect and fulfillment of their rights, and enhance capacity of duty-bearers to respond appropriately to human rights demands by:

- Promoting and protecting the rights of the vulnerable including, women, children and persons with disabilities; the right to work and employment; civil and political rights (CPRs); economic, social, and cultural rights;
- Incorporating human rights principles and standards in national development programming;
- Promoting human rights generally; and
- Enhancing gender equality.

The following activities were implemented under human rights mandate:

#### **Development of Information, Education and Communication materials**

CHRAJ in collaboration with the European Union Project in Ghana, “Accountability, Rule of Law and Anti – Corruption Programme– ARAP; organized a technical workshop for selected staff in January 2020. The main aim of the workshop was to develop technical skills in the development of information, education and communication materials for public education activities by the Commission.

### **COVID-19 Anti-Stigma Campaign**

- **Collaboration with West African Programme to Combat Aids and STI (WAPCAS)**

The Commission collaborated with WAPCAS to educate the public on issues of stigma and discrimination against coronavirus victims from May-June 2020. There were series of media engagements, including studio appearances and interviews by staff of CHRAJ and WAPCAS.

- **Collaboration with the United Nations Development Programme (UNDP)**

In July 2020, CHRAJ signed a memorandum of understanding (MoU) with UNDP to build the capacity of the general public on issues of COVID-19 stigma and discrimination. Under this project, the Abibigroma Resident Theatre Group and the Ghana Actors Guild were contracted to perform a sketch and music videos on the causes and effects of stigma and discrimination to the public. Other activities included capacity building workshop for opinion, religious and market leaders; media engagement and community sensitizations employing the use of an information van in five communities in Accra (Old Fadama, Mamobi, Nima, Agbogloshie and Madina). Personal protective equipment were also distributed to individuals in the target communities, with the support of the Coastal Development Authority.

Also, the Commission created safe space for COVID-19 victims to seek redress and increase public confidence and support for victims and families of COVID-19 patients. This was to enable victims realize their full potentials in society. To this end, a four (4) day workshop was organized in December on the theme: ‘Community Safe Space Operators for COVID-19 Stigma’. Targeted participants included religious, community and opinion leaders and civil society organizations.

#### ▪ **COVID-19 Stigma and Discrimination Assessment Exercise**

In the months of September and October 2020, CHRAJ assessed the impact of community sensitization activities in Nima, Mamobi, Madina, Old Fadama and Agbogloshie.

A total of sixty-four participants, made up of 39 males and 25 females, who attended the initial workshops were interviewed and they attested to the usefulness of the workshops on the causes and effects of COVID-19 related stigma and discrimination. Participants were also informed of available reporting mechanisms in CHRAJ and safe spaces in selected communities.

#### **Banishment and Discrimination against Persons with Albinism (PWAs)**

The Commission conducted research to ascertain the extent to which the fundamental human rights and freedoms of PWAs are being violated with particular focus on banishment and discrimination in Ghana. The study was premised on a petition from the Ghana Association of Persons with Albinism on the alleged banishment of PWAs in Burukuwa (a community in the Kwahu East District of Eastern Region), Akwamufie (a community in the Asuogyaman District of Eastern region) and Abease (a community near Atebubu, in the Pru East District of the Bono-East region).

The research established that PWAs encounter discrimination and some unconventional forms of banishment. Also, PWAs have poor vision and skin

conditions which tend to impede their socio-economic development as well as other day to day activities.

### **National Baseline Assessment on Business and Human Rights**

The Commission in collaboration with Ghana Institute of Management and Public Administration (GIMPA) completed a National Baseline Assessment on Business and Human Rights in Ghana and has shared the report with various stakeholders for their inputs. The National Baseline Assessment is a national assessment of the business environment in Ghana to ascertain the level of awareness of business and human rights principles and their level of compliance particularly, of the UN Guiding Principles on Business and Human Rights. The assessment will be the basis upon which a National Action Plan will be developed for Business and Human Rights in Ghana.

### **Inauguration of the committee for implementation of human rights education in first and second cycle schools**

To promote the national implementation of the human rights education elements of the 2030 agenda for sustainable development, CHRAJ partnered with the Danish Institute for Human Rights in June 2020 to ensure improved outcomes in educational policy, curricula, teacher education, student assessment and learning environment. A 13-member committee was inaugurated for the development of an action plan to further human rights education in primary and secondary school systems. These included representatives from the Ministry of Finance, Ghana Education Service, National Commission for Civic Education, Ministry of Education, Ghana National Association of Teachers, National Council on Curriculum and Assessment and the National Implementation Coordinating Committee on the SDGs under the National Development Planning Commission.

## **Commemoration of International Landmark Days**

The Commission commemorated a number of international landmark days to raise awareness of human rights issues in the country:

- **International Day of Older Persons 2020**

The Commission issued a press release on October 1, 2020, to celebrate the International Day of Older Person, under the theme: “Pandemics; Do they change how we address age and ageing”. The Commission called on the government of Ghana to do more to uphold the rights of older persons within the meaning of the National Ageing Policy, the Constitution and international instruments; and to accelerate processes of completing the ongoing stakeholder consultations on the National Ageing Bill and same laid before Parliament. The Commission further emphasized the special health needs of older persons and appreciation of the role of healthcare workforce in maintaining and improving the healthcare of the aged.

- **International Day of Persons with Disabilities 2020**

On 3<sup>rd</sup> December, the Commission issued a press statement to mark the International Day of Persons with Disabilities. With the global theme; “Not All Disabilities Are Visible” the statement focused on spreading awareness and understanding of disabilities that are not immediately apparent such as mental illness, chronic pain or fatigue, sight or hearing impairments, neurological disorders, learning differences among others. CHRAJ called on government, organizations and agencies to provide opportunities for supported education, training and employment for people living with disabilities, whether visible or invisible.

## **Regional High-Level NHRI Convening Workshop**

CHRAJ collaborated with the Network of African National Human Rights Institutions (NANHRI), to organize a regional high-level convening in Accra,

Ghana in October 2020. The convening formed part of NANHRI's Sexual Orientation, Gender Identity and Expression (SOGIE) project. This workshop was aimed at enhancing the capacity of African NHRIs in engaging, responding and protecting LGB/TINC persons at the national level. Participants included representatives from the five NHRIs on the NANHRI SOGIE Project (Kenya, Uganda, Malawi, South Africa and Ghana); SOGIE Reference Group (CSOs and LGB/TIGNC representatives) and the NANHRI Working Group. The overall aim was to bring together multidisciplinary experiences and human rights approaches geared towards integrating SOGIE rights into the realization of the SDGs, fostering strategic collaborations and mainstreaming SOGIE issues within NHRIs especially in inclusive monitoring and reporting of the SDGs.

### **Publication of Human Rights Articles**

The Commission published a number of articles centred on various aspects of human rights protection in the media during the reporting year. The articles were focused on right to health, disability rights, right to water and children's right. Others centred on corruption and elections; as well as child, early and forced marriages.

### **NGOs Forum**

In November, the Commission organized a meeting with some selected members of the NGOs Forum. The purpose of the meeting was to reignite the already existing coalition of Human Rights NGOs working with CHRAJ while encouraging collaboration and partnership towards advancing human rights protection, respect and fulfilment in Ghana. The meeting gave participants the opportunity to express their expectations in reviving and revamping of the NGOs forum with expanded membership in other regions.

## **Assessment and Observation of the right to vote in national elections**

The Commission assessed the right to vote during the 2020 Presidential and Parliamentary Elections in Ghana. The monitoring exercise aimed to enhance inclusiveness in the promotion and protection of the citizens' right to vote with particular focus on vulnerable persons. Some of the challenges observed included difficulty in identifying polling stations, difficulty in accessing voter materials, lack of proximity to polling stations; and long queues. The observation exercise covered the pre-, during-, and post-election phases. On the day of the elections, December 7, 2020, the Commission deployed 279 observers made up of 41 Roaming and 238 Non-Roaming Observers to all the regions of Ghana. An interim report was issued by the Commission on 9<sup>th</sup> December 2020.

## **Sensitization Programme on The Rights of Key Population**

The Commission partnered with various organizations (WAPCAS, CEPEHRG, Maritime Organization, Pride Project–Brother's Keeper, PRO-LINK and Solace Initiative) to organize sensitization programmes for key populations across Ghana. In all 239 LGBTQI/FSW in Accra, Koforidua and Kumasi; were reached and educated on non-discrimination, right to health, gender-based violence and bail related issues.

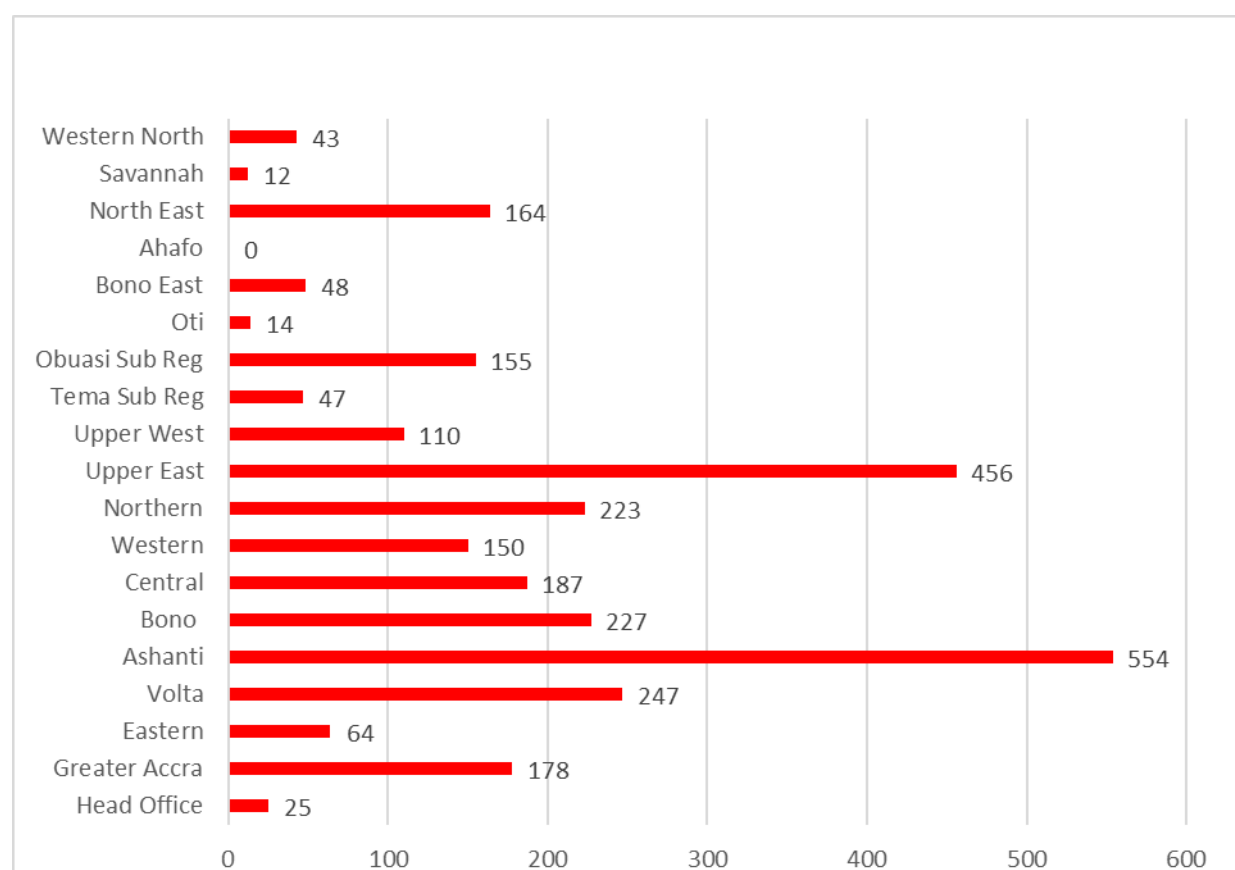
## **Baseline Study on Voluntary Principles on Human Rights and Security**

In November 2020, CHRAJ conducted a baseline study on the voluntary principles on human rights and security. The first component of the field study was conducted in communities impacted by mining and oil exploration activities. The communities are Tarkwa, Axim, Atuabo, Eikwe, Nsuta, Cape Three Points, Tebrebe, Wangarakrom, and Badukrom; all in the Western Region. The aim of the study is to establish how well companies in the extractive sector (mining, oil and gas) in Ghana are complying with the Voluntary Principles and the challenges companies and community members face.

## Human Rights Education

During the reporting year, the Commission organized 2,966 public education programmes on fundamental human rights and freedoms nationwide. Topics covered included harmful cultural practices (early and forced marriages), torture, right to education and health, child neglect and parental responsibilities, property rights of spouses, child labour, and domestic violence. See the diagram below for the regional distribution of public educational programmes.

*Fig 3: Regional Distribution of Public Educational Activities*



## Investigations and Enforcement of Human Rights Complaints

### Complaints Received and Resolved

The Commission received and classified 7,523 complaints under its human right mandate in the year 2020 as compared to 8,379 in the previous year. The percentage decrease is 10.2%.

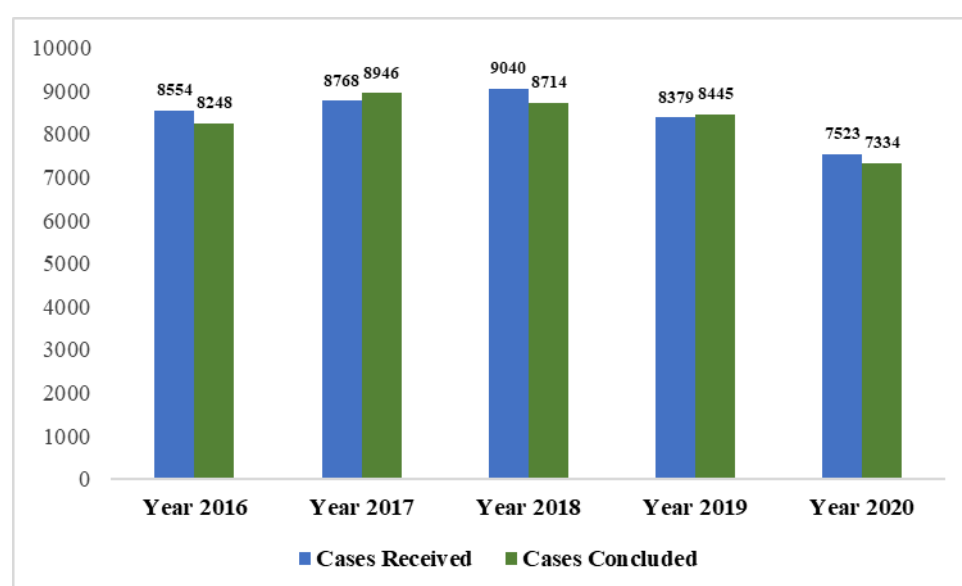


Seven thousand three hundred and forty-four (7,344) complaints were concluded in the reporting year. This was lower than the previous year's figure of 8,445 by 13.2%.

### **Trend of Cases Received and Concluded: 2016-2020 (5 Years Period)**

The Commission received 42,264 complaints and concluded 41,687 within the period of 2016 to 2020. Cases received increased averagely from 2016 to 2018 at a rate of 2.8% but decreased in subsequent years at an average rate of 8.6%. Refer to figure 3 below for the trend.

*Fig 4: Trend of Complaints Received and Concluded: 2016-2020*



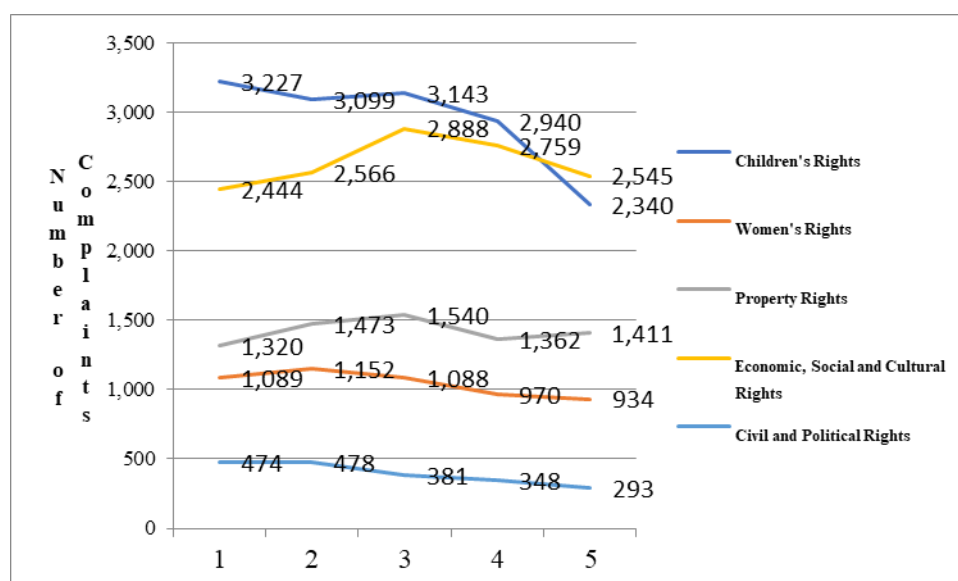
### **Nature of Human Rights Complaints**

Human rights complaints received were disaggregated into children's rights, women's rights, property rights, economic, social and cultural rights and civil & political rights. See table 3 and figure 5 below for the figures under each category and also the 5-year trend;

*Table 3: Types of Human Rights Complaints: 2016-2020*

TYPES OF RIGHTS	2016	2017	2018	2019	2020	TOTAL
Children's Rights	3,227	3,099	3,143	2,940	2,340	<b>14,749</b>
Economic, Social and Cultural Rights	2,444	2,566	2,888	2,759	2,545	<b>13,202</b>
Property Rights	1,320	1,473	1,540	1,362	1,411	<b>7,106</b>
Women's Rights	1,089	1,152	1,088	970	934	<b>5,233</b>
Civil and Political Rights	474	478	381	348	293	<b>1,974</b>
<b>TOTAL</b>	<b>8,554</b>	<b>8,768</b>	<b>9,040</b>	<b>8,379</b>	<b>7,523</b>	<b>42,264</b>

*Fig 5: Trend of Types of Human Rights Complaints: 2016-2020*



- Children Rights:** Complaints were mainly on failure of remittances for provision of necessities of life for the child in area of food, education, health, clothing and shelter. Right to paternity, custody, inhuman treatment and early and forced marriage were also relatively high. In all, 2,340 complaints were classified under Children's Rights and this constitutes 31.1% of the total

Human Rights complaints recorded in the reporting year. Refer to appendix B for full details.

- **Women Rights:** Complaints under this category were predominantly, violence against women, reproductive health rights and access to necessities of life such as food, clothing and shelter. Nine hundred and thirty-four (934) complaints were received under this category.
- **Property Rights:** One thousand four hundred and eleven (1,411) complaints constituting 18.6% of total Human Rights complaints were classified under property rights.
- **Economic, Social and Cultural Rights (ECOSOC):** Complaints reported were mainly labour rights, discrimination, tenancy related rights. It was the highest category among the Human Rights complaints. Two thousand five hundred and forty-five (2,545) (33.8%) complaints were classified under this category.
- **Civil and Political Rights:** Complaints received under this category were mostly harassment, right to dignity and inhuman treatment.

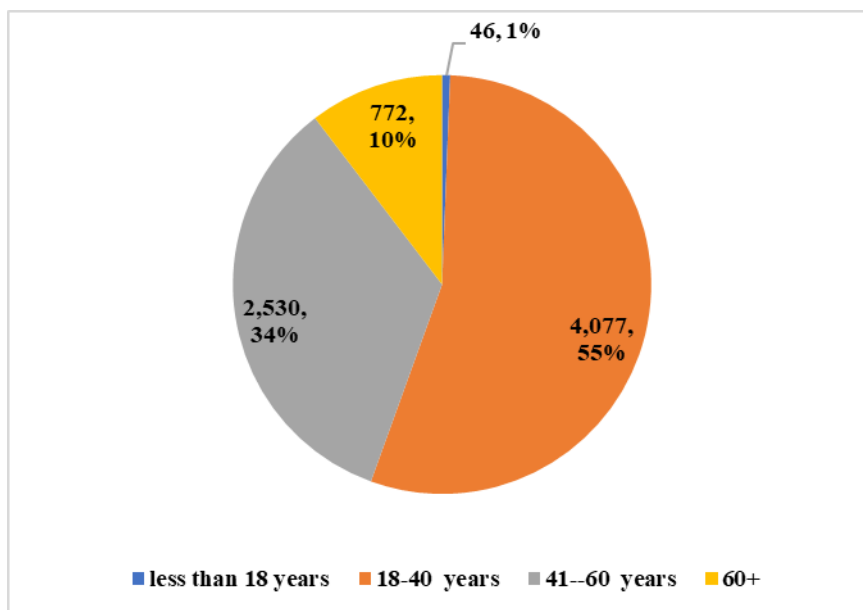
### Sex Distribution of Complainants

Out of 7,523 complaints received under human rights, 3,375 (44.9%) were made by males whereas 4,148 (55.1%) were females.

### Age Distribution

The ages of 7,425 complainants ascertained by the Commission have been illustrated on the diagram below;

*Fig 6: Age Distribution of Human Rights Complainants*



### **Respondent Bodies in Human Rights Complaints**

Seven thousand two hundred and twenty-three (7,223) which represents 96% of human rights complaints were lodged against individuals whereas the remaining were private organizations and enterprises. Refer to appendix E for details.

### **Mode of Closure of Human Rights Complaints**

Seven thousand three hundred and thirty-four (7,334) complaints were concluded. Four thousand three hundred and ninety-five (4,395) complaints representing 60% were successfully mediated. Two thousand two hundred and nine (2,209), constituting 30% of the complaints were decided and recommendations made by the Commission whereas the remaining 730 (10%) were either referred or complainant advised to seek redress at different fora.

### **Protecting fundamental rights of key populations**

#### **Complaint Received and Investigated: 2020**

In the reporting year, the Commission received 90 complaints from People living with HIV/AIDS (PLHIV) and other key populations which were classified as discrimination and stigmatization. Most of the complaints were made via telephone

calls and during Community engagement programmes though few were also done by walk-ins.

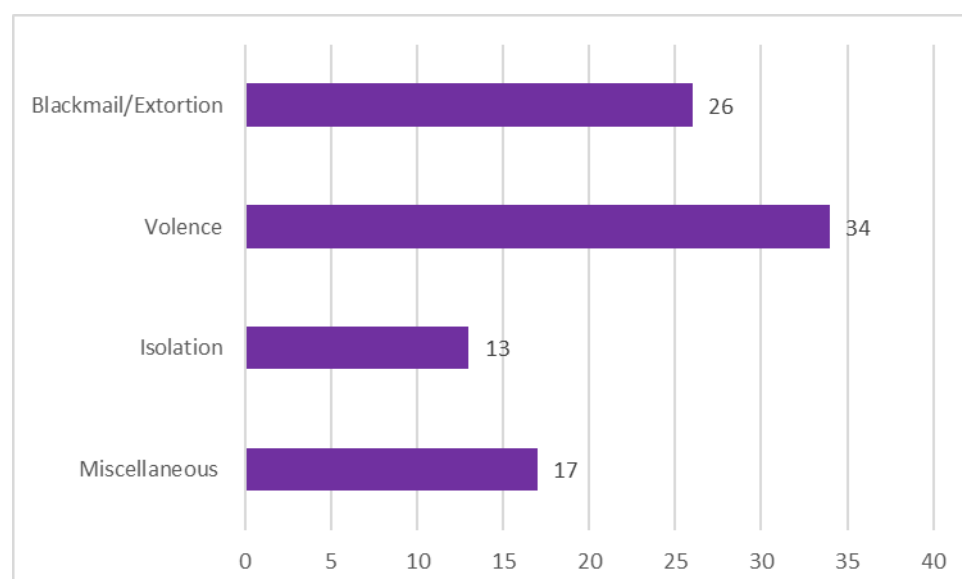
Eighty-one (81) complaints were resolved with 9 pending investigations at the end of the reporting period.

### **Nature of Discrimination/Stigma**

- **Isolation:** persons including family members disclosed the HIV/AIDS status of complainants. Consequently, people would not want to associate with them leading to isolation.
- **Violence:** complainants suffer various forms of violence including sexual, physical, harassment, threat and emotional.
- **Blackmail and extortion:** complainants were blackmailed and money extorted from them.
- **Miscellaneous:** these included false accusations, invasion of privacy, failure to remit money for upkeep of children and denial of share of property.

The number of complainants received under each category specified above has been represented on the diagram below:

*Fig 7: Nature of Discrimination/Stigmatization*



## Summary of Cases

### CASE No: *JM/14/2020*

The complaint was lodged by Helen Kanton Haduong (Complainant) at the Jirapa Municipal office of the Commission on April 3, 2020. The matter bordered on allegations of discrimination against the Municipal Health Director, Jirapa and Municipal Assembly (Respondent).

The Complainant averred that she was among a group of traders who had occupied a certain ancillary land closed to the main entrance of the St. Joseph's Hospital in Jirapa for the past one year and conducted their daily businesses to earn a lawful living. The complainant, who is a person with disability, also claimed that the Respondents suddenly asked her to vacate the place. Meanwhile other persons without any physical disability were allowed to stay on the same piece of land to continue with their business activities. As such, the complainant considered the Respondents' actions as discriminatory. The complainant further alleged that all her products worth hundreds of Ghana Cedis were destroyed during the Respondents' eviction exercise. The complainant sought for compensation and resettlement in a place of her choice within the Municipality to enable her continue with her business.

On receipt of the complaint, the Commission requested Respondents to submit their written comments to document allegations. In their response, the Respondents partially admitted to the allegations and further requested the Commission to conduct mediation on the matter in order to enable the parties to reconcile their respective positions.

Accordingly, the Commission conducted mediation into the matter and it was established that the Respondents indeed failed to follow due process during the eviction of the complainant from the said ancillary land. It also came out that the Respondents discriminated against the complainant as other traders without any

form of disability were allowed to continue with their business on the same piece of land. It was further established that complainant's items were destroyed by the Respondents during the eviction exercise.

Based on these established facts, the Respondents voluntarily agreed to compensate and also resettle the complainant at a different location of her choice within the Jirapa Municipality to continue with her business effective June 20, 2020.

Having used the mediation process to reverse the issue of discrimination against the complainant, the matter was closed in accordance with the Commission's Regulations.

#### ***CASE NO: JM/38/2020***

This complaint was lodged by Salifu Veronica (Complainant) at the Jirapa Municipal Office of the Commission on July 24, 2020 against the St. Joseph Orphanage and complainant's estranged husband (Respondent). The complaint bordered on the right of complainant to her biological child.

The complainant alleged that she was denied access to and custody of her two months old baby girl by the Respondent. The complainant further claimed that her traditional marriage with her estranged husband (2<sup>nd</sup> Respondent) became unhealthy a couple of years ago and she left the matrimonial home to her parental home. The Complainant indicated that she entered into a relationship with another man (fiancé) leading to the birth of a girl-child, who was then two months old. The complainant claimed that she and the fiancé had a little misunderstanding over the fiancé's extra marital affairs. As a result, the fiancé seized the child in issue and deposited it at the St. Joseph's orphanage for temporal custody. The complainant further revealed that some few days later they reconciled their difference and decided to go to the orphanage and take custody of their child. To her surprise, however, the Orphanage with the influence of the 2<sup>nd</sup> Respondent denied them

access to and custody of the child. The complainant averred that the action of 2<sup>nd</sup> Respondent was premised on the fact that the complainant's fiancé had not yet refunded the dowry (marriage rites) he paid to her family in accordance with the custom of people of Jirapa; and that until that was done, any child born out of any relationship between the complainant and any other man, including the child in issue, belonged to the 2<sup>nd</sup> Respondent.

The Commission, on receipt of the complaint, commenced investigations by inviting all parties to a meeting and the parties voluntarily agreed to mediation to settle the matter. During the mediation, the Commission made it clear to the Respondents that that cultural practice was not only repugnant to natural justice but also contrary to the laws of Ghana.

Following the mediation exercised conducted by Commission, the Respondents compromised their stands on the issue and agreed to return custody of the child to the complainant and her fiancé.

The Commission has observed that many children born out of wedlock in the Jirapa and other traditional communities in Ghana, where women in customary marriages who for any reason desert their husbands by leaving the matrimonial home but are not divorced in the eye of the custom, are faced with this obnoxious practice in which biological parents, especially fathers, are denied the right to such children by families who originally regularized such marriages by custom. In view of this custom, the rights of such children to the estate of either their biological father or customary father are jeopardized. As a result, many affected children and their biological mothers in particular, go through various challenges including, psychological trauma in matters of recognition and succession.

The Commission further notes that, notwithstanding this problem, the affected children and parents do not come forward to report such cases for redress, presumably for fear of intimidation by traditional leaders in the areas. The Commission believes the publication of the outcome of this case and its continuous



public education on the issue will encourage many affected children and parents within the Jirapa and other traditional areas where similar non-human rights compliant customs are practiced, to be empowered to challenge the narrative by lodging complaints with the Commission for redress.

## ***2.2. Administrative Justice Mandate***

### **Strategic goal 2: Promote fair administration of public services and contribute to demand for better service delivery**

The Commission ensured improved standards and adherence to practices of good conduct in administering public services by:

- Promoting principles and practices of good administration and conduct in the public services;
- Supporting improvement of frontline complaints handling by public services;
- Establishing the scope of CHRAJ's Administrative Justice oversight role over specific bodies under its jurisdiction; and
- Creating awareness of CHRAJ's role as an Ombudsman and the scope of its Administrative Justice function.

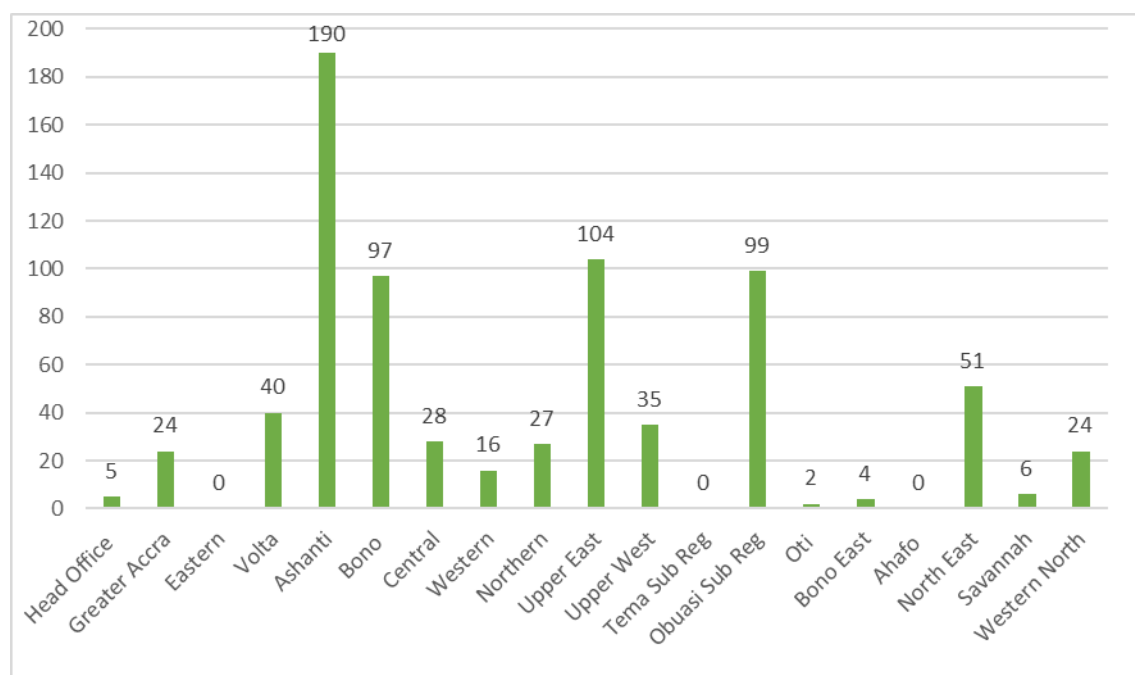
### **Public education**

In order to promote fair administrative principles as well as practices and good conducts in public service delivery, a total of 752 educational activities were conducted across the nation. It shows 26.3% decrease with respect to the previous year's figure of 1,020. The high percentage decrease may be attributable to COVID 19 pandemic which occasioned ban and limitations on public gatherings.

Specific topics treated under the various programmes included; good administrative principles and maladministration. Basically, staff of public sector institutions whose commissions and omissions affect the quality of public service

delivery benefitted from these educational activities. See figure 8 for the regional distribution of the public educational programmes.

*Fig 8: Regional Distribution of Public Educational Activities*



### **Public Sector Reform for Results Project (PSRRP)**

The Commission, under its Administrative Justice mandate, is one of the public sector institutions benefitting from the government of Ghana PSRRP Project funded by the World Bank. The overall objective of the PSRRP is to improve efficiency and accountability in the delivery of selected services by Selected Entities; made up of the Commission and other sixteen (16) MDAs of the project.

The Commission plays the lead role in the implementation of the sub-component 1.3: strengthening grievance redress and complaints handling for administrative services in Ghana.

In furtherance of this objective, the Commission submitted a Terms of Reference (ToR) for the engagement of consultant to review CHRAJ policies, procedures and institutional capacity to efficiently and transparently handle complaint filing,

intake, processing and resolution. And the Consultant has since been selected to undertake the exercise. Also, as part of the project implementation process, the under listed office equipment were supplied to the Commission:

- Desktop and Laptop Computers
- Printers
- Photocopiers
- Scanners
- Uninterrupted Power Supply
- Voice Recorders and
- Projectors

## **Case Management**

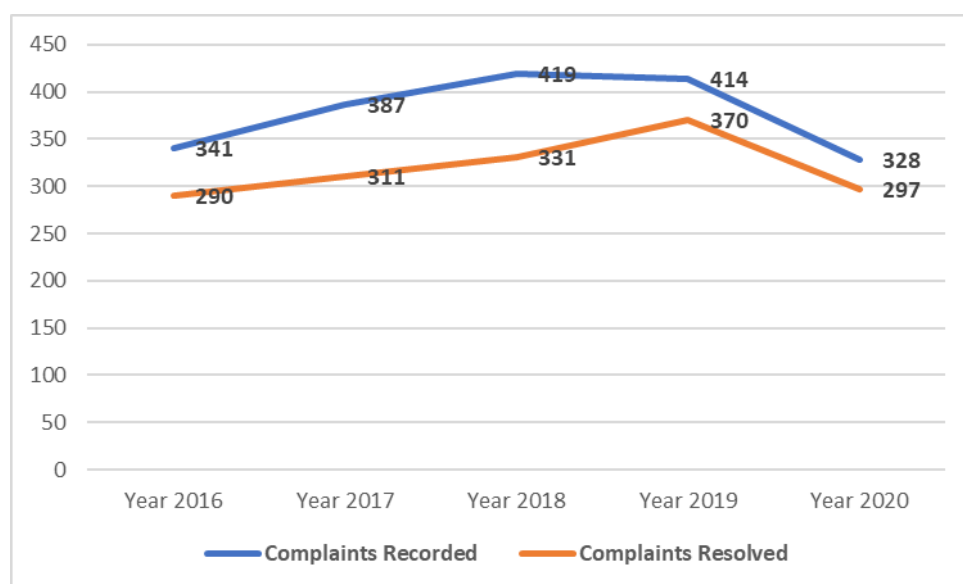
### **Complaints Received and Resolved**

A total of 328 Administrative Justice complaints were recorded in 2020 as against 414 in the previous year showing a decrease of 20.8%. Also, 297 complaints concluded was lower than the previous year's complaints figure of 370 by 19.7%.

### **Trend of Complaints Received and Resolved: 2016-2020**

Within the period of 2016 to 2020 (5 year's period) the Commission received 1,889 complaints and resolved 1,500. Complaints received increased steadily from 2016 to 2018 but decreased from 2019 to 2020. See figure 9 below for the trend;

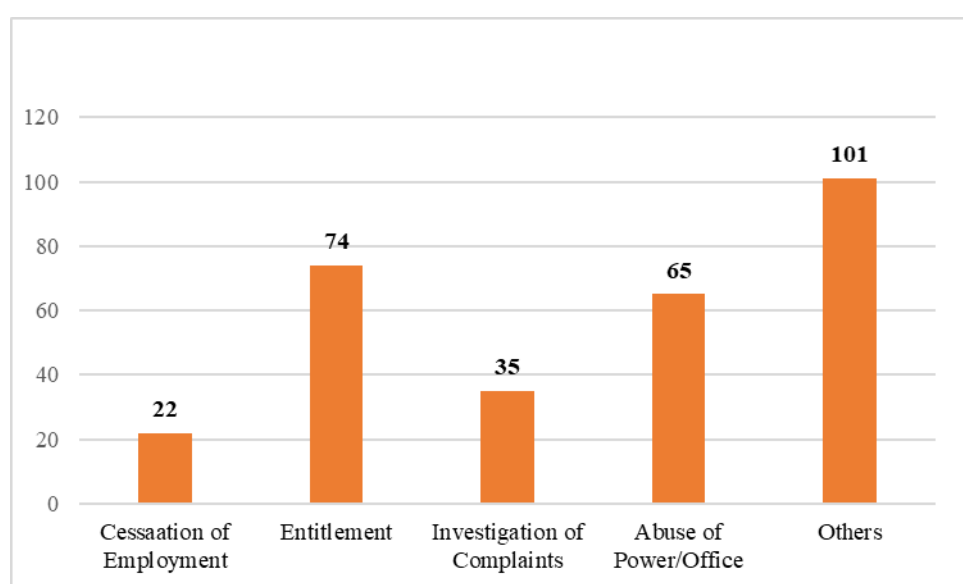
*Fig 9: Trend of Complaints Recorded and Resolved: 2016-2020*



### **Nature of Administrative Justice Complaints**

Complaints were on Employees Entitlement, Abuse of Office/Power, Improper Handling of Complaints (Investigations) and Cessation of Employment. See the diagram below and refer to appendix C for full details:

*Fig10: Nature of Administrative Justice Complaints*



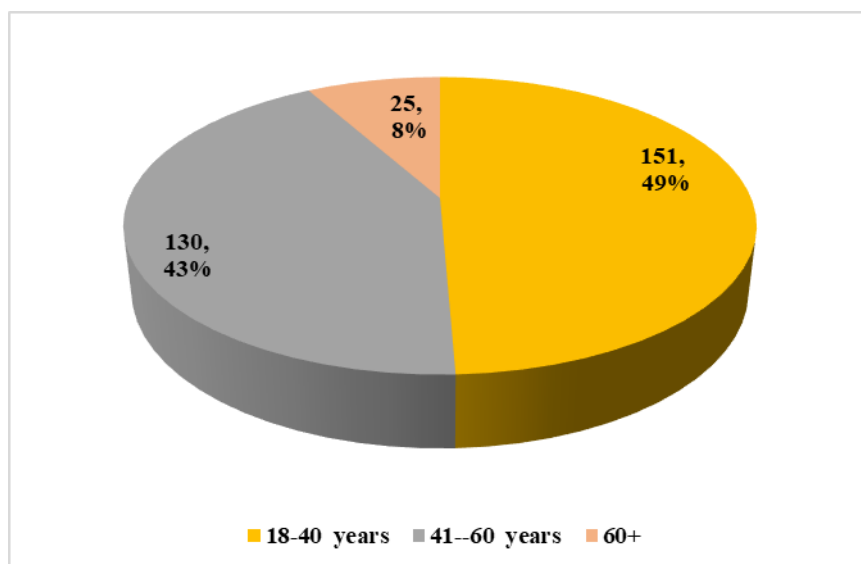
### Sex distribution of complainants

Two hundred and fifty-six (256) complainants constituting 78% of total complainants were males and 72(22%) were females.

### Age Distribution

The ages and the corresponding percentages of the 306 complainants of have been represented on the diagram below.

*Fig 11: Age Distribution of Administrative Justice Complainants*



### Respondent Bodies in Administrative Justice Complaints

Predominantly, complaints were received against Ghana Police Service, Ghana Education Service, Ghana Health Service, Banks, SSNIT and Metropolitan Municipal District Assemblies (MMDAs). For full list and respective complaints under each, refer to appendix F:

### Mode of Closure of Administrative Justice Complaints

A total of 297 complaints were concluded under Administrative Justice. Out of this figure, 63 representing 21% were settled through mediation, whereas 168 (57%)

were decided and recommendation made by the Commission. The remaining 66 (22%) complaints were either referred to appropriate institutions or complainant advised.

### **Summary of cases**

#### *CASE NO: CHRAJ/38/2018/331<sup>2</sup>*

On 31<sup>st</sup> January 2019, this Commission received a complaint from Citizens' Forum (Complainant) against the Ghana Immigration Service (the Respondent) alleging, among others, abuse of power arising from unfair, unreasonable conduct, and illegal collection of recruitment application fees from applicants seeking employment with the Respondent. The Complainant is a civil society organization, which seeks to impact national governance through awareness creation and advocacy on matters of social justice.

The Complainant alleged that the Respondent commenced a recruitment process and asked interested persons to apply by purchasing an application form at a cost of Fifty Ghana Cedis (Gh¢50.00). The Complainant further claimed that, at the close of application window and at the screening stage, it turned out that 84,000 applicants had applied to be recruited, despite the Respondent knowing it had capacity to employ only 500 applicants. According to the Complainant, the sale of the E-vouchers as a prerequisite for recruitment in the Respondent Ghana Immigration Service denied other Ghanaian youth the opportunity to access recruitment into the Respondent's institution.

Furthermore, the Complainant contended that the Respondent had no power as a public service institution operating under the laws of Ghana to sell application forms or charge fees for recruitment purposes. And that, the sale of the forms was contrary to law, particularly breaching specified provisions of the public financial

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<sup>2</sup> The full case may be obtained from the Commission

administration as provided under the Public Financial Administration Act, 2016 (Act 921) and the Financial Administration Regulations, 2004 (LI 1802).

In addition, the Complainant argued that the Respondent is bound by Articles 23 and 296 of the Constitution to be reasonable, fair and candid in the performance of its functions. By selling application forms totaling 84000 when it knew that it had capacity to recruit only 500 applicants, the Respondent acted in breach of articles 23 and 296 of the Constitution. That the Respondent's conduct of collecting monies from unemployed and vulnerable youth seeking to serve their nation constitutes an unreasonable administrative practice whose expenditures are borne by the Consolidated Fund.

In accordance with section 14(1) of the Commission on Human Rights and Administrative Justice Act, 1993 (Act 456), the Commission requested the Respondent to comment on the allegations. In response, the Respondent stated, among others, that:

- a. between November 27 – December 11, 2017 the Respondent, as part of its recruitment exercise, sold E-vouchers to prospective applicants at the cost of Gh¢50 per voucher. The recruitment was advertised in both electronic and print media where the qualification criteria was advertised.
- b. in previous years the E-vouchers were sold for Hundred Ghana Cedis (Gh¢100.00) per applicant. However, in 2017, the Ministry of Interior directed that the E-vouchers be sold for (Gh¢50.00) in 2017, a directive which the Respondent complied with.
- c. about 81,700 E-vouchers were sold out; 68,379 used the E-vouchers by applying online, while 15,621 failed to use the E-vouchers for unknown reasons. Twenty thousand nine hundred and two (20,902) were disqualified electronically and the remaining 47,477 were screened at various screening centers across the country. The Respondent explained that at the end of the

screening exercise 32,954 applicants were selected and were made to undergo written examination in all the 10 regional capitals.

- d. despite its capacity to recruit/enlist 500 applicants only out of the about 81,700, the Respondent posited that it intended to create a labour bank of potential candidates out of the E-vouchers sold from which subsequent recruitments would be done over a period of time without recourse to “time-consuming and expensive recruitment process”. Respondent further said that no ceiling was placed on the number of forms to be sold so as to give all eligible Ghanaians the opportunity to compete for the recruitment/enlistment into the institution.
- e. the policy on recruitment for all institutions under the Ministry of the Interior, the Ministry issued a directive to all institutions under it to resort to electronic recruitment. The price for the sale of the E-voucher was determined at the meeting of the Heads of institutions under the Ministry of the Interior. And the pricing was based on a directive to the Respondent by the said Ministry.
- f. all the proceeds from the sale of the E-vouchers were deposited at the Respondent account number, 1051130000894 domiciled at GCB Bank, Ministries Branch, Accra.
- g. section 19 of the Immigration Service Act, 2016 (Act 908), which provides for funds of the Respondent does not limit it to only funds approved by Parliament but also provides for moneys that are internally generated (i.e. IGF) in the performance of its functions.
- h. in respect of the contract for the electronic recruitment, the Respondent indicated that it conformed to the procurement processes; the contract was outsourced to a company known as TrybeNet Consult through sole sourcing having satisfied the procurement regulations, and after obtaining clearance from the Public Procurement Authority.



This complaint relates to alleged unfair, unreasonable and illegal acts, which portend abuse of power and the fair administration attributable to the Respondent in the performance of its statutory function. The alleged acts or infractions form the basis of administrative injustice or maladministration (poor/bad governance) for which the Commission is constitutionally and statutorily empowered to investigate and render necessary remedy/redress.

In assuming the mandate to investigate, the Commission considered the fact that the Respondent is a part of the Public Service of Ghana as specified under Article 190 (1)(a) of the Constitution.

It is also noteworthy to indicate that, the Commission is the Ombudsman or Administrative Justice institution of Ghana imbued with the mandate to exercise administrative oversight and control with power to review the decisions, acts, omissions and recommendations of all Public Service institutions in the country, including the Respondent whenever such decisions, acts and omissions are the subject matter of a complaint from members of the public to the Commission. By virtue of this oversight mandate, the Commission controls power exercised by public officials that may result in administrative injustice or maladministration. In this regard, Article 23 of the Constitution enjoins the Respondent, as a public body, in the discharge of its administrative functions, to act in fair, reasonable and just manner, and also comply with the laws that establish it.

[Article 23 of the 1992 Constitution provides that:](#)

*“Administrative bodies and administrative officials shall act fairly and reasonably and comply with the requirement imposed on them by law and any persons aggrieved by the exercise of such Acts and decisions shall have the right to seek redress before a court or other tribunal”.*

Furthermore, Article 296 of the Constitution outlines the parameters for exercising discretionary power by public institutions and public officials. It provides that:

*“where in the Constitution or any other law discretionary power is vested in any person or authority-*

- a. That discretionary power shall be deemed to imply a duty to be fair and candid;*
- b. The exercise of discretionary power shall not be arbitrary, capricious or biased either by resentment or, prejudice or personal dislike and shall be in accordance with due process of law; and*
- c. Where the person or authority is not a judge or other judicial officer, there shall be published by Constitutional Instrument or Statutory Instrument, regulations that are not inconsistent with the provision of this Constitution or that other law to govern the exercise of discretionary powers.*

Specifically, section 7(1) (a) & (b) of Act 456 provides, among others, that:

*The functions of the Commission are-*

- (a) To investigate complaints of violations of fundamental human rights and freedoms, injustice, corruption, abuse of power and unfair treatment of any person by a public officer in the exercise of his official duties*
- (b) To investigate the functioning of the Public Services Commission, the administrative organs of the State, the office of the Regional Co-ordinating Council, and the District Assembly, the Armed Forces, the Police Service, the Prison Service in so far as the complaints relates to failure to achieve balanced structuring of those services or equal access by all to the recruitment of those services or fair administration in relation to those services.*

These principles/standards underpinning good administrative practice as *sine qua non* for ensuring administrative justice impose on civil servants (public servants) the obligation to uphold basic standards of fairness, justice and reasonableness in the performance of their official functions.

As Ghana's Ombudsman, the Commission's administrative justice mandate has been properly triggered by the instant complaint alleging administrative injustice, arising from illegal, unfair, unjust and unreasonable exercise of discretionary power by the Respondent, an act or omission capable of resulting in abuse of power against the applicants. Besides, the Respondent is a public institution established pursuant to Article 190(1) of the Constitution as well as its enabling legislation, Act 908. Therefore, the Respondent is amenable to the Commission's oversight mandate of ensuring administrative justice in the performance of its functions.

The investigation was grounded on the following constitutional, legal and policy framework:

- Articles 23, 290, 218 and 296 of the Constitution.
- C.I. 67.
- Public Financial Management Act, 2016 (Act 921).
- Immigration Service Act, 2016 (Act 908).
- Financial Administration Regulation (FAR), 2004 (L.I. 1802).
- Fees and Charges (Miscellaneous Provisions) Act, 2009 (Act 793).
- Fees and Charges Regulations, 2015 (L.I. 2228).
- *Entick v. Carrington* [1765] 2 Wilson KB 275, 85 ER.
- *R (Baker) v. Devon CC* [1995] 1 ALL ER 73, 88
- *Associated Provincial Picture Houses Ltd v. Wednesbury Corp.* [1948] 1 KB 223

The Commission set down the following three issues for determination:

1. Whether or not the Respondent has the legal authority to charge fees in respect of recruitment/enlistment of staff
2. Whether or not the money realized from the sale of the E-vouchers were expended in accordance with the relevant laws that regulate public financial management.
3. Whether or not the Respondent acted fairly and reasonably regarding the sale of the E-vouchers to more than 84,000 unemployed applicants knowing that it had capacity to recruit/ enlist only 500 applicants.

The Commission, after its investigation, made the following findings:

1. That the Respondent's decision to charge fees or sell the E-vouchers to the public/applicants without prior Parliamentary approval contravenes the above stated provisions of the Public Financial Management Act, 2016 (Act 921), FAR (L.I. 1802) and the Fees and Charges (amendment) Instrument, 2016 (L.I.2228).
2. That the Respondent's decision to disburse the IGF accruing from the sale of the E-vouchers directly from the GCB Head Office Branch account instead of transferring same into the Consolidated Fund contravened Regulations 16, 17, and 18 of L.I 1802.
3. That the Respondent's act of charging fees or selling about 81,700 E-vouchers knowing that it could recruit/enlist only 500 personnel did not constitute unfair and unreasonable act under the circumstances of this particular complaint.

In view of the above, the Commission decision was as follows:

1. Considering the fact that the Respondent acted in breach of the above stated provisions of Act 921, L.I. 1802 and L.I. 2228, the Commission decided that the Respondent should henceforth desist from charging applicants for recruitment/enlistment into the Ghana Immigration Service. For the

avoidance of doubt, until the Respondent is able to justify and receive Parliamentary approval for fees and charges relating to recruitment/enlistment, such activities should be catered for the Respondent from its budgetary allocation for routine administrative expenses.

2. Even though the Respondent gave all the applicants equal opportunity to apply for the recruitment/enlistment and had no control over the number of applicants who could apply, the Commission decided that the Respondent should devise a system that will have a cut-off point so that in its future recruitment/ enlistment exercises, it would automatically cease taking in more than the reasonably necessary applicants and this should be made known to potential applicants in advance in such advertisements.
3. Notwithstanding paragraph 2 above, should the Respondent decide to resort to its labour bank for recruitment/enlistment, the selection process should be transparent and fair to ensure equal access to all shortlisted applicants. In order words, all applicants placed in the labour bank should be given the opportunity to compete for available recruitment places.

Further to the Decision, the Commission recommends for future guidance relative recruitment that the supervisory Ministry of the Interior, should take the necessary steps to advise the Respondent and other institutions falling under its purview including, the Ghana Police Service, Ghana National Fire Service, Ghana Immigration Service, Ghana Prison Service to desist from charging fees for recruitment/enlistment into their respective institutions so as to safeguard abuse of their statutory powers or acting ultra vires.

In the circumstances where it becomes expedient to charge fees in respect of recruitment, the Ministry of the Interior should ensure that the necessary Parliamentary approval is obtained in this regard.

## CASE NO. CR/C33/2019

On 1<sup>st</sup> July 2019, the Commission received a complaint from Abdul Salam Osuman (the Complainant) against the University of Cape Coast (UCC) (the Respondent). The Complainant alleged that the UCC Printing Press wrongfully terminated his employment.

The Complainant alleged that he was employed in 2016 by the University Printing Press without any appointment letter. That he was under paid but that the salary would be rectified upon receipt of an appointment letter. The Complainant further said that he worked for two years and four months, attended two interviews, one from the Printing Press Management Board and the other from the University Human Resource but heard no response from both.

The Complainant also claimed that in April 2019, he was suspended after he had an issue with a colleague at the work place; and after he reported back to work in May 2019, his appointment was terminated few weeks thereafter.

The complainant appealed to the Commission to investigate the matter and also direct the Respondent to re-instate him, give him written appointment letter, rectify his salary and refund the balance due him.

The Respondent UCC argued that it has internal redress mechanism to adequately address the complainant's grievances yet the complainant failed to explore this option but chose to report the matter to Commission which is an external body. The Respondent further stated that section 74 (1) of the Labour Act, 2003 (Act 651) provides that a contract of employment of casual work need not be in writing. Therefore, in the view of the Respondent, it was not under any obligation to issue an appointment letter when engaging the complainant on casual basis.

The Respondent added that per strict compliance with the law, casual workers should not be engaged for more than six months but the University applies human face and engages such workers at times beyond the period or re-engages them with

the hope that if there is financial clearance for recruitment of new staff they would be considered.

Finally, the Respondent said that all their staff are encouraged to avail themselves of the resources available to them internally to address their concerns. In practice all internal mechanisms need to be exhausted before they resort to external bodies like the Commission.

The Commission is an independent state institution established under Article 216 of the Constitution to protect and promote fundamental human rights and freedoms, ensure administrative fairness while promoting integrity in the public service.

The Commission derives its mandate and functions from section 7 of Commission on Human Rights and Administrative Justice Act, 1993 (Act 456) and Article 218 of the Constitution. The Commission is also guided by international human rights law and norms in the performance of its functions.

The Commission exercises oversight responsibility over administrative bodies and officials by way of reviewing their decisions and actions upon receipt of a complaint.

The Commission thus assumed mandate to investigate the matter because the Respondent is a public institution established under the UCC Act, 1992, (P.N.D.C. Law 278). Also, the termination of the complainant by the Respondent is an administrative decision which is subject to the Commission's oversight responsibility.

Based on the investigation, the Commission concluded that Respondent's conduct was unreasonable and unjust, and for that matter, decided that the Respondent should re-instate the complainant, pay his salary while on suspension, rectify his salary and pay the balance due him.

### ***2.3. Anti-corruption Mandate***

#### **Strategic goal 3: Promote and protect national integrity and investigate corruption**

The Commission contributed to public capacity and systems to combat corruption and promote national integrity by:

- Investigating complaints and allegations of corruption and misappropriation of public resources;
- Implementing anticorruption legislation and legislation that enhance transparency, including the Whistleblowers Act;
- Creating awareness of the evils of corruption and ethos of anticorruption
- Promoting and enhancing national integrity;
- Facilitating development of capacity and improving systems to combat corruption; and
- Collaborating and consulting with other national and international anti-corruption institutions.

#### **Meeting of the Steering Committee on the United Nations Convention Against Corruption (UNCAC)**

As part of Ghana's review process in terms of her implementation of the UNCAC in relation to preventive measures and asset recovery (Chapters 2 & 5), the review team visited the country from 26th to 30th October, 2019. During the visit, the team requested for additional information to enable it complete its report. As a result, the Commission on 19th February, 2020, convened a meeting of the Steering Committee to put together additional information for onward submission to the United Nations Office on Drugs and Crime (UNODC).



## **Execution of MoU for Key Accountability Institutions**

The Commission, on 10th and 11th March 2020 organised a meeting for representatives and heads of Key Accountability Institutions (KAIs) in Ghana to consider and adopt a MoU for their operations. Participants were drawn from institutions such as:

- CHRAJ
- Economic and Organised Crime Office
- The Attorney-General and Minister for Justice
- Ghana Audit Service
- Ghana Police Service
- Bureau of National Investigation
- Internal Audit Agency
- Financial Intelligence Centre
- Parliament of Ghana
- Narcotics Control Board, and
- Office of Special Prosecutor

For effective execution of the MoU, there was a maiden meeting on 15th September, 2020 where the Road Map for the development of Protocols was discussed. The meeting which was attended by 10 representatives culminated into the setting up of a three-member Committee to develop the protocols. The draft protocols were developed and subsequently reviewed at a meeting organized on 24th November, 2020 pending approval by the Heads of the KAIs in 2021.

Also, a two-member Committee was constituted to formulate an Action Plan for implementation in 2021 after the adoption of the protocols.

## **Designation and training of regional ethics officers**

The Commission designated and trained 16 Ethics Officers from all regional offices across the nation during the year under review. The two-day workshop

which was held from 4th to 7th October 2020, was aimed at strengthening the capacity of the officers to understand and appreciate ethics as a corruption issue.

The topics covered under the training were:

- Ethics and compliance: meaning and scope
- Public sector integrity programme
- Code of conduct for public officers under chapter 24 of the 1992 constitution
- Building individual and systems integrity: the role of the ethics officer
- Gift policy developed by the commission for public officers.

### **Preparation of 2019 NACAP Progress Reports**

The Annual Progress Report (APR) 2019 prepared by the Monitoring and Evaluation Committee (MONICOM) under NACAP, was reviewed by the High-Level Implementation Committee (HiLIC) and MONICOM in July, 2020. It was finally approved for printing and dissemination.

### **Implementation of PSIP (Code of Conduct and Gift Disclosure Rules)**

As part of efforts to enhance knowledge of staff, the Commission distributed copies of the generic Code of Conduct for Public Officers to staff of the Head office. Also, cognizance of its role to ensure compliance with the Assets Declaration law, the Commission continued to assist relevant staff to comply with the requirement to declare their assets and liabilities. In this regard the Commission procured the assets declaration forms from the Audit Service and distributed same to the staff concerned.

### **Technical assistance to NACAP implementing partners (IPs)**

On the request of IPs, the Commission organized series of sensitization programmes on NACAP for selected institutions. The sensitization exercise was aimed at deepening understanding of the plan and the specific roles assigned to various IPs. The beneficiary institutions were Ghana Police Service, Bank of Ghana, National Communications Authority, Ministry of Special Development

Initiatives, Office of the Head of Civil Service, and Ministry of Lands and Natural Resources and its Agencies.

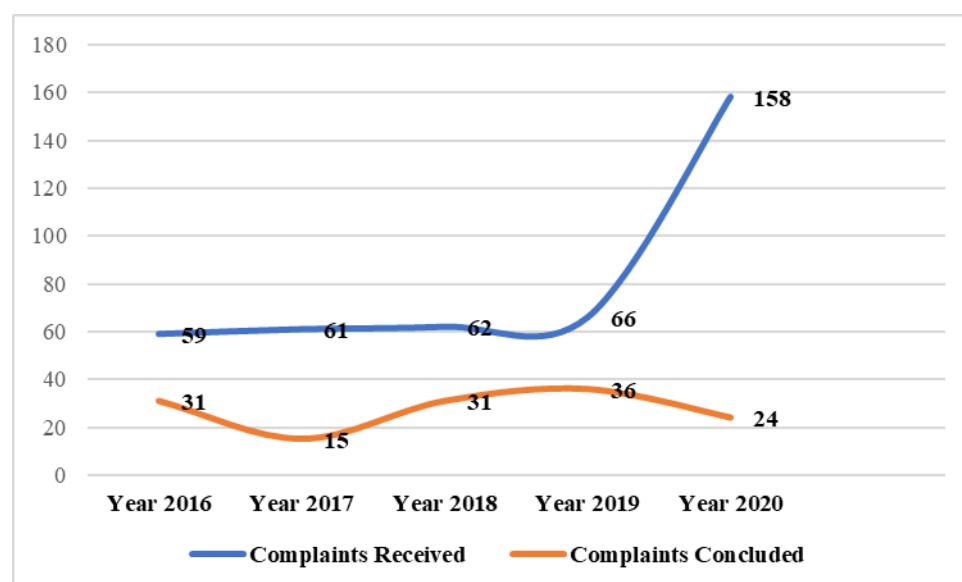
## Case Management

### Complaints Recorded and Concluded

A total of one hundred and fifty-eight (158) cases were recorded under the Anti-Corruption mandate of the Commission during the period. This figure shows 139% increase over the previous year's figure of 66.

Twenty-four (24) cases were concluded during the reporting period. Comparing the previous year's figure of 36, the concluded figure was lower by 33.3%. See the trend in the diagram below:

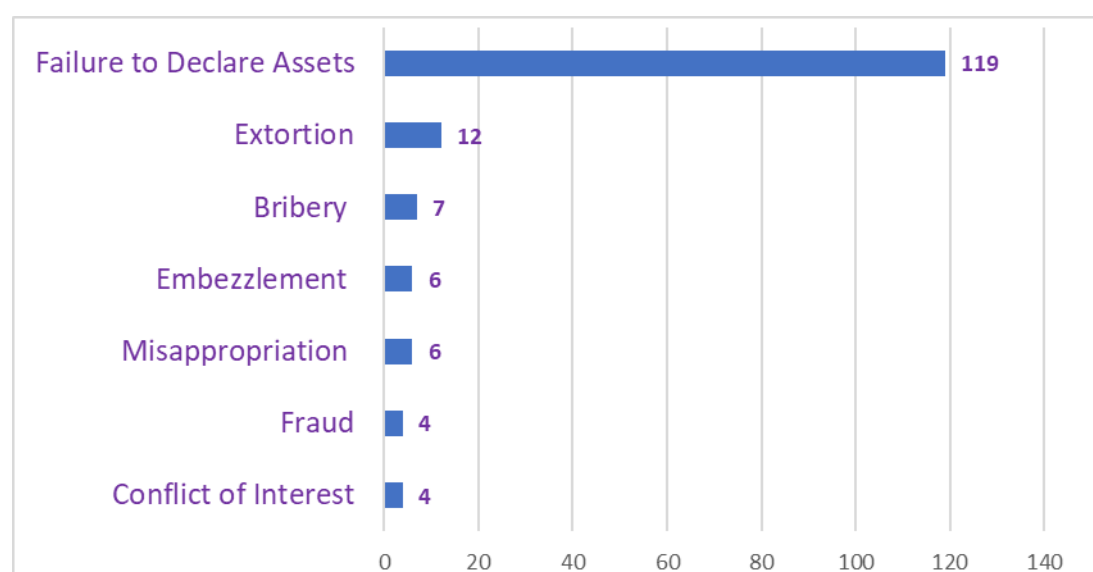
*Fig 12: Trend of Complaints Recorded and Concluded: 2016-2020 (Five Years Period)*



### Nature of Corruption Allegations

The nature of allegations of corruption has been represented on the diagram below.

*Figure13: Nature of Allegations of Corruption*



### **Respondent Bodies in Allegations of Corruption**

Complaints recorded under this category were mostly against private individuals who were holding official positions in public institutions. These officers were mostly public officials from Judicial Service, Ghana Police Service, Ghana Health Service and Metropolitan, Municipal and District Assemblies (MMDAs). Refer to appendix G for details.

### **Mode of Conclusion of Corruption Cases**

Out of the 24 complaints concluded, 20 were decided by the Commission, while 4 were either referred or declined after initial assessment of the case.

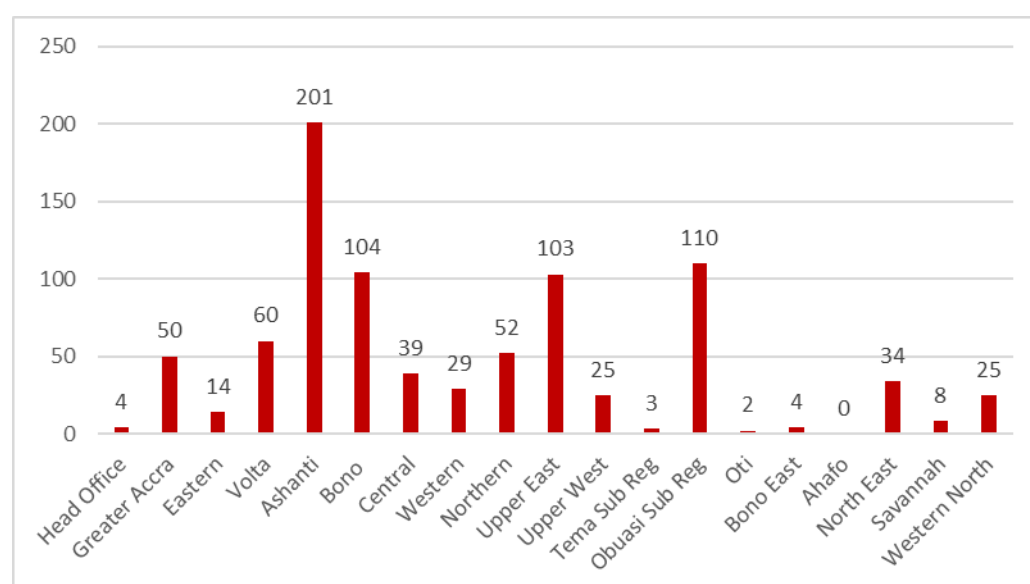
### **Sources of Cases Recorded**

- Thirty-four (34) complaints/allegations of corruption were received from private individuals made up of 31 male and 3 female
- One hundred and twenty (120) complaints were received from Civil Society Organisations and
- Two (2) cases were initiated by the Commission based on media reports.

## Anti-Corruption Education

A total of 867 public education activities on anti-corruption were carried out across the nation. This figure represents 53% reduction of last year's performance. These programmes benefited various communities, schools and members of the general public. Corruption as a human rights issue, Code of Conduct for Public Officers, Conflict of Interest, corruption in election and NACAP were some of the areas covered by the campaigns. Number of public education by region is shown on figure 14 below:

*Fig 14: Regional Distribution of Public Educational Activities*



## Summary of selected cases

### CASE No. 241/2019<sup>3</sup>

On 22nd August 2019, the President of the Republic of Ghana (the Complainant), in a letter signed by his Secretary, lodged this complaint at the Commission alleging conflict of interest against Mr. Adjenim Boateng Adjei, the then Chief Executive Officer (CEO) of the Public Procurement Authority (PPA) (the

<sup>3</sup> The full decision may be obtained from the Commission

Respondent). The submission of the complaint followed the airing of a documentary produced by Manasseh Azure Awuni, which not only relates to conflict of interest but also corruption and abuse of power.

Prior to the lodging of the complaint, on Wednesday, 21st August 2019, Joy TV News Channel of Multimedia Group aired a documentary produced by Manasseh titled "Contracts for Sale" as the outcome of his investigations. The documentary, among others contained allegations of conflict of interest, abuse of office and corruption by the Respondent. Following the broadcast, the complainant suspended the Respondent and subsequently referred the allegations contained in the documentary to the Commission and the Office of the Special Prosecutor (OSP) for investigation and appropriate action. Though the Commission has the mandate under the 1992 Constitution (the Constitution) to investigate, among others, "All instances of alleged or suspected corruption and the misappropriation of public monies by officials...", the Commission restricted its investigation to the allegations of conflict of interest since the Complainant, the President referred the allegations of corruption emanating from the same documentary to the OSP.

The particulars of allegations made against the Respondent were contained in the said documentary attached to the complaint relating to conflict of interest, corruption and abuse of power, and included that:

- i. Talent Discovery Ltd (TDL), a company established by the Respondent in June 2017, a few months after he was appointed CEO of PPA, was awarded contracts from Ministries, Department and Agencies (MDAs) through single source/restricted tendering;
- ii. The respondent is a majority shareholder (60%) and Director of TDL, with his brother-in-law, Francis Arhin owning 40% shares;
- iii. TDL "sells" the contracts awarded to it by the MDAs and other public procurement entities;

- iv. Suppliers and contractors interested in buying those contracts from TDL had to register with TDL by paying a non-refundable fee of GHC 5,000;
- v. TDL uses links at the top to win contracts;
- vi. The Respondent uses information he acquires as the CEO of the PPA to the advantage of TDL;
- vii. The Respondent's role as Chief Executive Officer of the PPA, and shareholder and Director of TDL and other companies placed the Respondent in conflict of interest.

The Respondent denied the allegation of conflict of interest; by setting up his own issues under the following subheadings and stated his position:

- *Allegation that Messrs Talent Discovery Limited is engaged in the Sale of Contracts obtained after winning a process of Competitive Tender*

The Respondent asserted that the allegation does not impinge on conflict of interest. That a claim of the sale of contracts by TDL after that company had participated in a tender not organized by the PPA and it had been declared the successful tenderer not by the PPA but by other entities, has no bearing on a conflict of interest with the Respondent's duties as a public officer.

- *Allegation that the Function of the Due Diligence Unit of the PPA Places Respondent in a Conflict of Interest Situation*

The Respondent denied that the position of the CEO of the PPA, as "head of the Due Diligence Unit (DDU)" of the PPA in conducting due diligence on applications for restricted tender or single-source procurement, before forwarding same to the Board for consideration, places the Respondent in a conflict of interest situation. He described that allegation as "...conjectural, spurious and founded on a lack of knowledge or understanding of the role of the DDU and the duty of the Board in the consideration of applications for restricted tendering method of

procurement by procurement entities”. He explained further that the conduct of due diligence by the DDU is not one of the steps required by Act 663 in the consideration of application for restricted tendering and single source procurement.

- *Allegation as a result of the prior information by TDL on prices quoted by entities, enables TDL to quote prices very close to those provided by entities*

The Respondent stated that “If the allegation referred to in the preceding paragraph is anything to go by, it would imply that no successful tenderer pursuant to an application for restricted tendering, ought to be deemed legitimate. This is because every successful tender is always below or equal to the budget for the procurement activity. As a matter of law, the award of a procurement contract by an entity in excess of the budget for the contract is prohibited.

- *Allegation that our Respondent’s Position as a Board Member Puts Him in a Conflict of Interest Situation*

The Respondent denied this allegation and stated that it is “...misleading and betrays a complete ignorance of or disregard for the actual function of the Board of the PPA in applications for restricted tendering”. He explained that applications for restricted tendering are filed at the PPA after the entities in question have already identified and shortlisted companies to participate in the restricted tendering process. The Board of the PPA, of which the Respondent is a member, is not responsible for shortlisting companies.

The Respondent concluded his comments by stating that on account of all of the above, there is no evidence of any act or omission supporting an allegation of having discharged his duties as a public officer for the benefit of a company he has an interest in. The allegations in the documentary against the Respondent are simply anchored on assumptions and conjectures and betray gross unfamiliarity with the laws on public procurement in Ghana and same should be dismissed as unmeritorious.



### *Applicable constitutional, legal and policy framework*

The Commission was guided in its investigation by the overarching values and principles espoused in the 1992 Constitution, the CHRAJ Act, the Public Procurement Act, 2003 (Act 663) (as amended), as well as other legal, regulatory and policy framework relating to the proper conduct of public officers who have been entrusted with the functions of state.

### *Issues for the investigation/determination*

The main issues identified for determination were:

1. Whether or Not the Respondent Established Talent Discovery Limited (TDL) a Few Months after he was Appointed CEO of PPA;
2. Whether or Not the Respondent had Resigned as Director of TDL at all Material Times;
3. Whether or Not Contracts Awarded to TDL by Ministries, Departments and Agencies (MDAs) and other Public Procurement Entities between June 2017 and August 2019 were mainly through Single Source and Restricted Tender;
4. Whether or Not TDL was involved in the sale of State contracts awarded to it;
5. Whether or Not the Respondent used his office improperly for the benefit of TDL and other companies affiliated to him;
6. How does the Respondent explain the volume of Cash that passed through his Bank Accounts between March 2017 and August 2019 (Unexplained Wealth); and Page 37 of 188 7) Whether or Not the Respondent put Himself in a Position where his Personal Interest Conflicted or was Likely to Conflict with the Performance of the Functions of his Office.

### *Summary of key findings of the investigation*

The following constitute the key findings of the investigation:

- i. Talent Discovery Limited (TDL) was incorporated on 19 June 2017, three months after the Respondent was appointed CEO of PPA in March 2017, by the Respondent and his brother-in-law Francis Kwaku Arhin, the Respondent being the majority shareholder. The Respondent is both a director and shareholder of TDL and Francis Arhin, Respondent's brother-in-law, is a director, shareholder and CEO of TDL. In effect, the Respondent has personal interest in TDL (financial and relational).
- ii. Although the Respondent claimed that he had resigned as director of TDL by reason of letter dated 5<sup>th</sup> September, 2017 addressed to the CEO and Company Secretary of TDL, all the relevant official records of the company showed that he remained a director of TDL at all material times, and that his purported resignation letter had no probative value whatsoever.
- iii. The evidence supports the allegation that TDL participated in a number of restricted tenders, which applications came before the Respondent in his capacity as CEO of PPA and member of the Board of PPA for approval. TDL was awarded 10 contracts through restricted tender between June 2017 and 22 August 2019. However, the evidence did not support the allegation of award of contracts through sole sourcing.
- iv. The Respondent participated in the decision-making process on restricted tender applications that had TDL shortlisted without disclosing his private capacity (financial and relational) interest in the company or recusing himself, except on one occasion, in violation of the Board's resolution on the matter and Article 284 of the Constitution.
- v. The evidence further showed that the Respondent, on at least two occasions, used his office as CEO of PPA improperly by altering the decision of the Board to the benefit of TDL, a company in which he has personal (financial and relational) interest.
- vi. Officials of TDL (Thomas Amoah, Administrative Manager, who is also sometimes described as General Manager, Project Manager or Group

Manager, and Abigail, the Office Secretary), the company in which the Respondent is majority shareholder and director, were clearly seen and heard in the documentary offering to sell contracts awarded to TDL by public procurement entities through restricted tender. The evidence also established a pattern of movement of large volumes of cash through the Respondent's Bank Accounts between March 2017 and August 2019, far in excess of his known income (Stanbic Bank: USD Account - \$516,225.00; Cedi Account - GH¢3.83 million; Euro Account - EU54.500; UMB Bank: \$110,000). The Respondent could not offer satisfactory explanation to the source of that huge volume of cash that passed through his bank account between March 2017 and August 2019.

- vii. The totality of the evidence showed that the Respondent had put himself in a position where his personal interest (financial and relational) conflicted with the performance of the functions of his office as CEO and Board Member of PPA.

### *Decision*

Having found as facts that Respondent has put himself in several positions where his personal, relational, and pecuniary interest in TDL and other companies actually conflicted with the performance of the functions of his office as CEO and Board Member of PPA, the Commission holds that the Respondent has contravened article 284 of the 1992 Constitution.

Article 287 (2) provides that: The Commissioner for Human Rights and Administrative justice or the Chief Justice as the case may be, may take such action as he considers appropriate in respect of the results of the investigation or admission (emphasis supplied).

In the exercise of its power under Article 287(2), the Commission has held in previous cases it investigated under Chapter 24 of the Constitution that the

appropriate action taken in respect of the results of any investigation must be proportionate to the magnitude of the contravention complained of.

The Respondent, being the CEO of PPA, the Regulator of the procurement sector, the Commission is of the strong and considered view that he has gravely abused his high office of trust, and the appropriateness and proportionality of any action to be taken by the Commission must be commensurate with the gravity of the abuse.

In addition to the constitutional provision on conflicts of interest, the Public Procurement Act, 2003 (Act 663) as amended, the parent law which the Respondent is obliged to comply with in the course of his duties, specifically provides under Sections 93 and 92 as follows:

93: (1) Entities and participants in a procurement process shall, in undertaking procurement activities, abide by the provisions of article 284 of the Constitution, which provides: “A public officer shall not put himself in a position where his personal interest conflicts or is likely to conflict with the performance of his functions”.

[Section 92 \(1\) and \(2\) of the same Act also provides:](#)

*(1) “A person who contravenes a provision of this Act commits an offence and where a penalty is not provided for the offence, that person is liable on summary conviction to a fine not exceeding “two thousand five hundred” penalty units or a term of imprisonment not exceeding five years or to both the fine and the imprisonment.”*

*(2) The following also constitute offences under this Act: (b) directly or indirectly influencing in any manner or attempting to influence in any manner the procurement process to obtain an unfair advantage in the award of a procurement contract.*

Further, Article 23 of the Constitution provides: Administrative bodies and administrative officials shall act fairly and reasonably and comply with the requirements imposed on them by law and persons aggrieved by the exercise of such acts and decisions shall have the right to seek redress before a court or other tribunal.

The above provisions demonstrate the gravity the law attaches to conflicts of interest in the procurement industry, and which the Respondent himself was heard on the documentary espousing. All these go to show that the Respondent did not act out of ignorance. He knew that the conduct was prohibited under the Constitution and the PPA Act, and yet chose to do it because of the personal benefits he gained from it.

Given all the circumstances, including the overwhelming evidence and Respondent's explanation and spirited defence, the commission considers the following actions as appropriate and proportionate having regard to the result of this investigation:

- i. The Commission has determined that the Respondent is unfit to hold public office and is therefore disqualified from holding any public office for a period of five years. Accordingly, it is hereby directed that no appointing authority of the State should engage or appoint the Respondent (Mr. Adjenim Boateng Adjei) into any public office howsoever described for the said five (5) year period beginning from the date of this Decision.
- ii. Consequent upon the above determination His Excellency the President of the Republic of Ghana, as the appointing authority of Respondent, should terminate the appointment of the Respondent as CEO of the PPA.

### *Recommendations*

Section 18 (1) of Act 456 mandates the Commission to make recommendations that it thinks fit after an investigation. It would therefore be remiss on the part the

Commission, in view of the evidence that has come to its attention, if it did not make appropriate recommendation and consequential directives to address the irregularities identified. 1) Section 86 of Act 663 Provides that:

(1) The Board shall, with the approval of the Minister, compile and publish a code of conduct that shall apply to each official of a procurement entity, the members of an evaluation panel, members of a tender review committee, members of the Board as well as tenderers, suppliers, contractors and consultants.

(2) The code of conduct shall address: (a) conflicts of interest in procurement; (b) measures to regulate matters concerning personnel responsible for procurement; (c) declarations of interest in particular procurements; (d) screening procedures and training requirements; and (e) any other matter related to the ethics of procurement.

(3) The code of conduct shall promptly be made accessible to the public and shall be updated regularly as directed by the Board.”

(4) The Board of the PPA should see to it that the procurement entities strictly comply with the lay down procedures in restricted and single sourcing tendering stipulate in section 38 to 41 of Act 663 as amended.

The results of this investigation has reinforced the wisdom behind the legislative intendment of Parliament in Section 86 of the PPA Act as amended. The Commission therefore directs the Board of the PPA to as a matter of urgency see to the compilation and publication of the code of conduct envisaged under Section 86 of Act 663, and have it ready for use not later than six (6) months from the date of this decision.

2) Sections 34A and 38 (1) of Act 663 requires that procurement entities that decide to use the restricted tender method must apply to the PPA for approval and must justify why they had decided the use that method of procurement. The evidence available to the Commission show that except the Ministry of Education which provided specific reasons for its application to the PPA Board, many of the

applications for restricted tender between March 2017 and August 2019 from procurement entities reviewed in the course of this investigation did not provide any justification, and yet the same were approved by the PPA Board. The PPA Board is directed to pay closer attention to this irregularity and ensure the practice does not recur.

3) As noted above, the Commission came across evidence of inordinately large volumes of cash passing through the Bank Accounts of the Respondent far in excess of his known income, and for which he could not provide satisfactory explanation (unexplained wealth). Besides the excessive nature of the volumes of cash, the pattern of the deposits and withdrawals also raised suspicions about the nature of the transactions. Accordingly, the Commission is referring the suspicious transactions in the Respondent's Bank Accounts to the Economic and Organized Crimes Office (EOCO) for further investigation under the Anti-Money Laundering Act, 2008 (749) as amended.

4) Primarily, this investigation was initiated on the basis of conflicts of interest allegations. In the course of the investigation, however, the Commission came across evidence of seeming unethical practices by the company TDL, the company owned by the Respondent and his brother-in-law. In the circumstances the Commission is constrained to refer the evidence of the seeming unethical practices of TDL to the Registrar of Companies and the PPA for further investigation and appropriate action.

#### ***2.4. Management and Administration***

**Strategic goal 4: Strengthen capacity to promote and protect human rights, national integrity, accountability, and ensure administrative justice**

The Commission met programmatic requirements to improve organizational performance by:

- Motivating, training, recruiting, retaining, and balancing the mix of professional and general staff with sufficient competencies to perform their assigned duties;
- Establishing efficient systems and processes maintained by a high standard of operations to enable consistent delivery of CHRAJ's mandates;
- Rehabilitating and acquiring adequate facilities and equipment for a complete infrastructure necessary for CHRAJ to carry out its mandates; and
- Enhancing visibility of CHRAJ's role and services.

The sub-programmes implement activities towards enhancing organizational performance. Under this objective, they operate to recruit staff, motivate them to work, train and retain staff for specific jobs. They maintain a balance in the professional and general staffing to meet the various capacity demands of the Commission for effective and efficient service delivery.

### **Staff Strength**

The Commission ended the year 2020 with a reduced number of staff from 696 in 2019 to 693; comprising 464 males and 229 females.

### **Staff Training and Development**

During the year, three (3) staff had the opportunity to pursue further studies to develop their capacity in different academic fields to support the Commission's work.

The Commission upgraded 14 staff after successful completion of higher education. These 14 staff comprised 7 males and 7 females.



### **Temporary Staff**

The Commission had a total of 29 temporary staff. Twenty-six (26) were national service personnel, made up of 10 males and 16 females from tertiary institutions, whereas 3 staff were on contract.

### **General Administration**

At the head office of the Commission, the renovation of the conference room commenced, the premises had asphalt outlay and the walls painted.

## **PART THREE**

# **INTERNATIONAL COOPERATION**

The Commission continues to carry out formal working relations with a number of International and Regional institutions/bodies in its mandate areas. Through working with these bodies, CHRAJ shares experiences and best practices on the thematic areas of human rights, administrative justice and anti-corruption from Ghana's perspective and by so doing contributes to strengthening many other sister institutions<sup>4</sup> and global performance. The affiliations range from payment of subscription fees to undertaking flexible Memoranda of Understanding across the mandate areas. The ensuing paragraphs discuss the Commission's affiliations and activities in accordance with the mandate areas.

### ***3.1. Human Rights***

The Commission continues to enjoy 'A status' membership with the Global Alliance of National Human Rights Institutions (GANHRI)<sup>5</sup>. GANHRI is an International Association of National Human Rights Institutions (NHRIs) across the globe with the primary aim of promoting and strengthening NHRIs to be in accordance with the Paris Principles while also providing leadership in the promotion and protection of human rights. The GANHRI supports NHRIs in many ways including: facilitating and supporting NHRIs engagement with the UN Human Rights Council and Treaty Bodies; encouraging cooperation and information sharing among NHRIs; and promoting the role of NHRIs within the United Nations and with States and other international agencies.

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<sup>4</sup> This includes National Human Rights Institutions (NHRIs), Ombudsman and Anti-Corruption Institutions

<sup>5</sup> Formerly known as International Coordinating Committee (ICC) established in 1993

The ‘A status’ accreditation by the GANHRI Sub-Committee on Accreditation makes the Commission compliant with the Paris Principles and it is therefore accorded speaking rights and seating at Human Rights Treaty Bodies and other related organs of the United Nations.

Again, the Commission is a member of the Network of African NHRIs (NANHRI) based in Nairobi (Kenya) and, the Network of NHRIs in West Africa (NNHRI-WA) based in Accra (Ghana).

The Commission continues to serve as Africa’s Representative on the GANHRI Working Group on the United Nations Sustainable Development Goals (SDGs); and an alternate member of the Sub-Committees of Accreditation of GANHRI and the OHCHR.

The Commissioner of CHRAJ continues to chair the NANHRI Working Group on the 2030 agenda for sustainable development and the Africa Agenda 2063; and also serves as President of the NNHRI-WA in 2019.

### **Activities Implemented Included:**

#### **Activity Report to African Commission on Human and People’s Rights**

The Commission, through its International Cooperation Unit, prepared and submitted CHRAJ second report to the African Commission on Human and People’s Rights (ACHPR) in 2020, after its initial report in 2018. CHRAJ received affiliate status to the ACHPR on May 7, 2015 at the ACHPR 56th Ordinary Session in the Gambia. The report covered the period 2018 to 2019; and detailed the institutional and functional overview of CHRAJ, the domestic human rights situation as well as highlights of other activities undertaken within the reporting period, among others.

## **Learning and Exchange Visit to Two (2) South African Institutions**

Three staff of the Commission attended a three-day learning and exchange visit to the South African Human Rights Commission and the Commission on Gender Equality in December 2020. The visit was a follow up to the Regional High-Level NHRI Convening Workshop on SOGIE. The main objective of the learning and exchange visit was for the staff of CHRAJ to learn good practices and establish collaborative engagements with the South African institutions in the work of human rights protection and promotion.

## **Training Workshop on Human Rights Protection and Reporting**

This ECOWAS facilitated training workshop on human rights protection and human rights reporting for members of the NNHRI-WA and the Network of Civil Society Organizations Human Rights Monitors, was held in February 2020 at Kofi Annan International Peacekeeping Training Centre in Accra, Ghana.

## **NNHRI-WA led Programmes:**

### **▪ NNHRI-WA Regional Teleconference with NHRIs from West Africa**

In June 2020, the Secretariat of NNHRI-WA (hosted by the Commission), in collaboration with its partners, including the OHCHR and ECOWAS Commission, organized a virtual regional conference. The conference discussed the human rights-based approach to responding to the COVID-19 pandemic. The main objectives were as follows:

- To forge a common understanding on how NHRIs are integrating human rights norms and principles into the national responses of the COVID-19 outbreak;
- To share lessons learned and best practices, and
- To discuss and agree on ways and means to address new challenges resulting from the COVID-19 pandemic.

Participants shared best practices and lessons learned from their respective countries and institutional experiences on the various topics discussed. These included the OHCHR Guidelines on Human Rights and COVID-19, executive orders and the full enjoyment of human rights, impact of COVID-19 restrictions on electoral processes and the right to health, and the human rights-based approach to the COVID-19 pandemic.

#### ▪ **Presidential and Parliamentary Elections Observations Missions**

The International Cooperation Unit of the Commission, which doubles as the Secretariat of the NNHRI-WA since 2019, successfully sourced funding and embarked on the maiden presidential and parliamentary elections observations missions in Burkina Faso, Ghana and Liberia in 2020. The national election observation exercises were aimed at: contributing to credible, free, transparent, peaceful and safe elections in West Africa in accordance with domestic laws and international standards for democratic elections; contributing to the promotion and protection of the civil and political rights of all stakeholders' in elections; helping in building trust in electoral processes and enhance the legitimacy of governments that emerge after elections; providing impartial and credible reports and recommendations towards bringing about changes and improvements to electoral processes; and ensuring democracy and human rights in West Africa.

The NNHRI-WA was established in 2006 pursuant to Article 35 of the ECOWAS Protocol on Democracy and Good Governance<sup>6</sup> to promote coordination and cooperation among NHRIs for the promotion and protection of human rights in the ECOWAS Region.

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<sup>6</sup> Protocol A/SP1/12/01 on Democracy and Good Governance Supplementary to the Protocol relating to the Mechanism For Conflict Prevention, Management, Resolution, Peacekeeping and Security

### *3.2. Administrative Justice*

The Commission is an active member of the International Ombudsman Institute (IOI) as well as the African Ombudsman and Mediators Association (AOMA). The role of Ombudsman institutions generally is to protect people against violation of rights, abuse of power, unfair decisions and maladministration. The IOI, which was established in 1978, has membership well over 190 independent Ombudsman institutions drawn from more than 100 Countries worldwide. In its effort to focus on good governance and capacity building, the IOI supports its members in threefold way: training, research and regional subsidies for projects. Similarly, the AOMA prides itself as “a vehicle for promoting good governance and the rule of law in Africa”. Its mission statement is “to advance the development of the Ombudsman Institution for the furtherance of good governance, the Rule of law, and Human Rights in Africa.”

### *3.3. Anti-Corruption*

Again, the Commission is affiliated to the International Association of Anti-Corruption Authorities (IAACA), Association of African Anti-Corruption Authorities (AAACA), and the Network of Anti-Corruption Institutions in West Africa (NACIWA). The IAACA is an independent, non-political, anti-corruption organization, composed of institutions responsible for investigation, prosecution and prevention of corruption around the world. The objective of the Association is to promote the effective implementation of the United Nations Convention Against Corruption (UNCAC), fostering constructive collaboration among its members in the prevention and control of corruption, as well as asset recovery and international cooperation.

The following activities were undertaken in the anti-corruption front:

### **High-Level Conference on The Fight Against Corruption in Mali**

Two representatives of the Commission took part in a three-day High-Level Conference on the Fight against Illicit Enrichment organised by the Central Office for the Fight against Illicit Enrichment and the UNODC, Central and West Africa. The Conference took place in Bamako, Mali in February 2020. It brought together the heads, executives and experts of the anti-corruption community in Africa.

The Conference, the first of its kind in Mali, sought “to promote and share experiences and development of synergy of actions between anti-corruption organisations to obtain tangible results”.

### **Draft OHCHR Guidelines on Stolen Asset Recovery and Human Rights**

The Commission submitted a research paper to the Office of the High Commissioner for Human Rights (OHCHR) in May 2020 on Stolen Asset Recovery and Human Rights. The research paper served as an input into OHCHR draft Guidelines on Stolen Asset Recovery and Human Rights. Two representatives of the Commission, Mr. Charles Ayamdoo (Director, Anti-Corruption Department), and Mr. Lambert Luguniah (Head, International Cooperation Unit), participated in the experts’ discussions leading to the finalization of the said Guidelines.

## PART FOUR

### FINANCIAL REPORT

In line with Article 227 of the Constitution, 1992 and Section 21 of the CHRAJ Act, 1993 (Act 456), the Commission received a total of Thirty-Eight Million, Two Hundred and Fifty-Two Thousand, Eight Hundred and Fifty-Five Ghana Cedis, Ten Pesewas (GH¢38,252,855.10) for its operations during the year under review. The amount constitutes 93.5% of the total annual estimated budget of Forty Million, Eight Hundred and Ninety-Seven Thousand, Five Hundred and Fifty-One Ghana Cedis (GH¢40,897,551.00).

*Table 4: GoG Budget and Releases for 2019-2020*

Expenditure Classifications	2019 (GH¢)			2020 (GH¢)		
	Budget	Releases	% Released	Budget	Releases	% Released
Compensation	24,000,000.50	22,212,985.22	92.6	23,193,131.00	25,237,024.10	108.8
Goods & Services	5,438,185.00	4,332,498.24	79.7	12,204,420.00	9,688,871.00	79
Assets	2,409,885.00	1,258,958.10	52	5,500,000.00	3,326,960.00	60.5
<b>Total</b>	<b>31,848,070.50</b>	<b>27,804,441.56</b>	<b>87%</b>	<b>40,897,551.00</b>	<b>38,252,855.10</b>	<b>93.5</b>

From the table above, Compensation exceeded the budget by 8.8% while Goods and Services and Assets fell short by 21% and 39.5% respectively. Releases in 2020 were higher than 2019 by 6.5%.



## PART FIVE

# APPENDICES

### *5.1: Detail statistical tables*

### Appendix A: Classification of Complaints Received, Concluded and Pending According to Offices

REGIONS	CASES RECEIVED / RECORDED				CASES CONCLUDED				CASES PENDING			
Central Region	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
CAPE COAST	52	4	0	56	39	3	0	42	24	2	0	26
AGONA SWEDRU	171	2	0	173	173	1	0	174	24	1	0	25
WINNEBA	56	1	0	57	58	0	0	58	9	1	0	10
AJUMAKO	25	0	0	25	22	0	0	22	7	0	0	7
TWIFO PRASO	31	0	0	31	32	0	0	32	6	0	0	6
APAM	32	0	0	32	31	0	0	31	2	0	0	2
BREMAN ASIKUMA	23	0	0	23	22	0	0	22	3	0	0	3
SALTPOND	55	1	0	56	51	1	0	52	4	0	0	4
ELMINA	20	0	0	20	23	0	0	23	6	0	0	6
DUNKWA OFFIN	36	0	0	36	40	0	0	40	0	0	0	0
ASSIN FOSU	33	0	0	33	36	0	0	36	10	0	0	10
<b>SUB- TOTAL</b>	<b>534</b>	<b>8</b>	<b>0</b>	<b>542</b>	<b>527</b>	<b>5</b>	<b>0</b>	<b>532</b>	<b>95</b>	<b>4</b>	<b>0</b>	<b>99</b>
Greater- Accra	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL

HEAD OFFICE	186	113	134	433	120	87	2	209	41	135	150	326
ACCRA REG. OFFICE	13	5	0	18	10	5	0	15	9	6	0	15
TEMA	59	3	0	62	50	2	0	52	67	4	0	71
AMASAMAN	88	0	0	88	90	0	0	90	30	3	0	33
WEIJA	49	1	0	50	48	1	0	49	53	3	0	56
DODOWA	8	0	1	9	4	0	1	5	17	1	0	18
ADAFOAH	43	2	0	45	42	2	0	44	24	5	0	29
SOWUTUOM	47	2	0	49	37	1	0	38	16	1	0	17
SUB- TOTAL	493	126	135	754	401	98	3	502	257	158	150	565
Northern	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
TAMALE, REG. OFFICE	44	16	0	60	25	14	1	40	63	12	0	75
SABOBA	27	0	0	27	25	0	0	25	8	0	0	8
GUSHEJU	4	0	1	5	4	0	1	5	0	0	0	0
BIMBILLA	46	0	0	46	43	0	0	43	12	0	0	12
TOLON	6	1	1	8	4	2	2	8	1	1	1	3
YENDI	33	0	0	33	29	0	0	29	4	0	0	4
ZABZUGU	5	0	0	5	5	0	0	5	1	0	0	1
SAVELUGU	6	0	1	7	4	0	1	5	2	0	0	2
SUB- TOTAL	171	17	3	191	139	16	5	160	91	13	1	105
Bono	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
SUNYANI, REG. OFFICE	228	8	0	236	234	8	1	243	45	5	0	50
WENCHI	166	0	0	166	180	0	0	180	7	0	0	7
DOMAA	217	0	0	217	283	0	0	283	26	0	0	26
DROBO	64	1	0	65	68	0	0	68	18	1	0	19

NSAWKAW	77	0	0	77	69	0	0	69	12	0	0	12
BEREKUM	99	0	0	99	110	0	0	110	5	0	0	5
<b>SUB- TOTAL</b>	<b>851</b>	<b>9</b>	<b>0</b>	<b>860</b>	<b>944</b>	<b>8</b>	<b>1</b>	<b>953</b>	<b>113</b>	<b>6</b>	<b>0</b>	<b>119</b>
<b>Bono - East</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>
TECHIMAN, REG. OFFICE	297	1	0	298	289	2	0	291	59	1	0	60
NKORANSA	102	1	0	103	100	1	0	101	17	0	0	17
ATEBUBU	116	0	0	116	105	0	0	105	11	0	0	11
KINTAMPO	133	1	0	134	49	0	0	49	95	1	0	96
KWAME DANSO	157	1	0	158	155	1	0	156	5	0	0	5
<b>SUB- TOTAL</b>	<b>805</b>	<b>4</b>	<b>0</b>	<b>809</b>	<b>698</b>	<b>4</b>	<b>0</b>	<b>702</b>	<b>187</b>	<b>2</b>	<b>0</b>	<b>189</b>
<b>Western</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>
TAKORADI, REG. OFFICE	60	4	1	65	62	6	0	68	7	0	1	8
HALF ASSINI	26	1	0	27	24	0	0	24	3	0	0	3
DABOASE	50	0	0	50	49	0	0	49	1	0	0	1
AGONA NKWANTA	27	0	0	27	23	1	0	24	8	0	0	8
ASANKRAGWA	69	0	1	70	67	0	1	68	7	0	0	7
TARKWA	29	1	0	30	29	4	0	33	12	0	0	12
AXIM	38	0	0	38	32	0	0	32	6	0	0	6
<b>SUB-TOTAL</b>	<b>299</b>	<b>6</b>	<b>2</b>	<b>307</b>	<b>286</b>	<b>11</b>	<b>1</b>	<b>298</b>	<b>44</b>	<b>0</b>	<b>1</b>	<b>45</b>
<b>North -East</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>
NALERIGU, REG OFFICE	5	3	0	8	1	0	0	1	4	3	0	7
GAMBAGA	12	0	0	12	12	0	0	12	0	0	0	0

WALEWALE	23	1	0	24	15	0	0	15	12	1	0	13
SUB-TOTAL	40	4	0	44	28	0	0	28	16	4	0	20
Ahafo	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
GOASO, REG OFFICE	155	0	0	155	146	0	0	146	26	0	0	26
KENYASI	194	0	0	194	165	1	0	166	73	0	0	73
BECHEM	66	0	1	67	46	0	0	46	19	0	1	20
SUB-TOTAL	415	0	1	416	357	1	0	358	118	0	1	119
Oti	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
DAMBAL, REG OFFICE	19	4	2	25	12	1	0	13	9	3	0	12
NKWANTA	89	2	0	91	82	0	0	82	17	2	0	19
JASIKAN	70	1	0	71	70	1	0	71	0	0	0	0
KADEBI	48	0	0	48	44	0	0	44	11	0	0	11
KETE KRACHI	46	5	0	51	45	6	0	51	6	0	0	6
SUB-TOTAL	272	12	2	286	253	8	0	261	43	5	0	48
Western - North	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
WIAWSO, REG OFFICE	164	1	0	165	125	0	0	125	39	1	0	40
BIBIANI	112	3	0	115	110	2	0	112	4	0	0	4
ENCHI	102	3	0	105	96	3	0	99	6	0	0	6
JUABO	36	1	0	37	38	0	0	38	2	0	0	2
SUB-TOTAL	414	8	0	422	369	5	0	374	51	1	0	52
Volta	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
HO, REGIONAL OFFICE	52	10	4	66	50	9	1	60	13	7	3	23
AKATSI	226	8	1	235	243	16	2	261	44	9	3	56

HOHOE	125	9	0	134	123	12	0	135	3	3	0	6
DENU	260	3	2	265	264	2	0	266	44	1	2	47
SAGAKOPE	146	2	0	148	132	1	0	133	14	1	0	15
ADIDOME	62	0	0	62	78	0	0	78	6	0	0	6
KPANDO	73	2	0	75	69	1	0	70	4	1	0	5
KETA	110	0	2	112	116	0	2	118	4	0	2	6
<b>SUB- TOTAL</b>	<b>1054</b>	<b>34</b>	<b>9</b>	<b>1097</b>	<b>1075</b>	<b>41</b>	<b>5</b>	<b>1121</b>	<b>132</b>	<b>22</b>	<b>10</b>	<b>164</b>
<b>Eastern</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>
KOFORIDUA, REG. OFFICE	15	5	0	20	4	3	0	7	31	8	1	40
NKAWKAW	20	1	0	21	19	0	0	19	5	1	0	6
KADE	74	1	0	75	72	0	0	72	2	1	0	3
NEW ABIREM	60	0	0	60	57	0	0	57	2	0	0	2
BEGORO	37	0	0	37	35	0	0	35	2	0	0	2
KIBI	22	1	0	23	32	3	0	35	2	0	0	2
NSAWAM	23	1	0	24	22	0	0	22	1	1	0	2
ASAMANKESE	69	0	0	69	60	0	0	60	9	0	0	9
SUHUM	13	0	0	13	13	0	0	13	0	0	0	0
AKOSOMBO	20	0	0	20	20	0	0	20	0	0	0	0
AKIM ODA	16	0	0	16	18	1	0	19	1	0	0	1
AKROPONG	24	2	0	26	26	1	0	27	3	0	0	3
MANYA KROBO	29	0	0	29	33	0	0	33	2	0	0	2
DONKORKROM	16	0	0	16	14	0	0	14	2	0	0	2
<b>SUB-TOTAL</b>	<b>438</b>	<b>11</b>	<b>0</b>	<b>449</b>	<b>425</b>	<b>8</b>	<b>0</b>	<b>433</b>	<b>62</b>	<b>11</b>	<b>1</b>	<b>74</b>
<b>Savannah</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADMIN</b>	<b>COR</b>	<b>TOTAL</b>
DAMANGO,	8	1	0	9	8	0	0	8	3	0	0	3

REG OFFICE												
BOLE	6	0	0	6	4	0	0	4	3	1	0	4
SALAGA	21	1	1	23	23	3	0	26	6	0	0	6
SUB-TOTAL	35	2	1	38	35	3	0	38	12	1	0	13
Upper East	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
BOLGATANGA	24	15	0	39	26	11	1	38	8	5	0	13
ZEBILLA	44	0	0	44	41	0	0	41	3	0	0	3
SANDEMA	34	5	0	39	30	5	0	35	4	0	0	4
BONGO	30	0	0	30	28	1	1	30	7	0	0	7
BAWKU	30	1	0	31	29	1	0	30	4	0	0	4
NAVRONGO	54	0	0	54	55	0	0	55	0	0	0	0
SUB-TOTAL	216	21	0	237	209	18	2	229	26	5	0	31
Upper West	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
REG. OFFICE WA	59	15	0	74	46	9	2	57	39	20	2	61
NADOWLI	25	0	0	25	26	1	1	28	1	1	0	2
JIRAPA	52	1	0	53	52	1	0	53	2	0	0	2
LAWRA	43	1	0	44	43	1	0	44	0	0	0	0
SUB- TOTAL	179	17	0	196	167	12	3	182	42	21	2	65
Ashanti Region	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL	HR	ADMIN	COR	TOTAL
KUMASI, REG. OFFICE	85	31	2	118	93	42	0	135	13 3	53	22	208
OFFINSO	361	0	0	361	419	0	0	419	20	0	0	20
EJURA	59	0	0	59	68	0	0	68	15	1	0	16
KUNTANASE	110	5	2	117	115	2	1	118	9	4	1	14

NKAWIE	45	1	0	46	44	2	0	46	16	4	0	20
MANKRANSO	32	0	0	32	24	0	0	24	13	0	0	13
EFFIDUASE	46	2	0	48	51	2	1	54	4	0	0	4
NEW EBUBIASE	53	0	0	53	54	0	1	55	3	0	0	3
MANSO NKWANTA	74	0	0	74	80	1	0	81	4	0	0	4
AGONA	64	0	0	64	69	0	0	69	24	2	0	26
KONONGO	25	0	0	25	23	1	0	24	3	0	0	3
JUASO	44	3	0	47	36	1	0	37	13	2	0	15
TEPA	57	0	0	57	69	1	0	70	6	0	0	6
MAMPONTENG	28	0	0	28	25	0	0	25	21	0	0	21
MAMPONG	37	3	0	40	43	2	0	45	5	2	0	7
BEKWAI	33	1	1	35	40	1	1	42	6	1	0	7
OBUASI	154	3	0	157	168	4	0	172	12	1	1	14
SUB-TOTAL	1307	49	5	1361	1421	59	4	1484	30 7	70	24	401
GRAND- TOTAL	7523	328	158	8009	7334	297	24	7655	15 96	323	190	2109

## Appendix B: Regional Breakdowns of Nature of Human Rights Complaints Received

NATURE OF ABUSES	BR	UW	UE	WR	VR	HQ	BE	AR	GR	NE	ER	CR	WN	SAV	ASH	NR	OTI	TOT
<b><u>CHILDREN'S RIGHTS</u></b>																		
Right of Access to Natural Parents	12	10	22	4	26	0	16	1	28	0	11	30	13	7	40	0	10	230
Right to Health	0	0	0	0	0	0	11		3	0	2	4		0	13	0	0	33
Right to Education	4	3	5	0	21	0	5	1	2	2	6	10	1	0	1	5	5	71
Child labour	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
Right to Paternity	3	0	1	0	12	0	33	3	7	1		6	1	0	20	2	0	89
Right to Maintenance (necessaries of life)	102	28	76	103	210	18	142	56	83	14	158	123	87	16	240	29	77	1562
Inhuman Treatment	0	0	2	0	1	0	5	0	1	0	4	0	1	0	3	0	1	18
Child Trafficking	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	1	3
Right to Lawful Custody	14	6	9	3	81	5	53	14	13	4	14	13	8	1	7	12	13	270
Early and Forced Marriage	0	0	5	0	2	0	3	0	0	2	0	0	0	3	2	7	1	25
Right to Name	0	0	0	0	3	1	0	0	1	0	0	11	0	0	2	0	0	18
Defilement	1		1	0	7	0	1	0	1	0	0	0	1	0	5	0	1	18
<b>SUB-TOTAL</b>	<b>136</b>	<b>47</b>	<b>121</b>	<b>110</b>	<b>367</b>	<b>24</b>	<b>269</b>	<b>75</b>	<b>140</b>	<b>23</b>	<b>195</b>	<b>197</b>	<b>112</b>	<b>27</b>	<b>333</b>	<b>55</b>	<b>109</b>	<b>2340</b>
<b><u>WOMEN'S RIGHTS</u></b>																		
<b><i>Violence against Women</i></b>																		
➤ Battery	3	0	14	4	8	1	10	2	0	0	1	1	34	0	19	3	6	106
➤ Emotional & Psychological	52	6	3	7	12	7	80	23	17	0	0	11	17	0	33	4	2	274
Sexual Harassment	1	0	0	1	1	0	2	0	0	0	1	0	1	0	1	0	0	8
Spousal Rights to maintenance	48	1	3	16	17	1	71	27	15	0	46	7	10	0	3	7	11	283



Reproductive Health Rights	8	5	11	8	48	3	27	8	7	3	11	24	26	3	22	29	18	261
Rape	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	0	2
<b>SUB-TOTAL</b>	<b>112</b>	<b>12</b>	<b>31</b>	<b>36</b>	<b>87</b>	<b>12</b>	<b>190</b>	<b>60</b>	<b>40</b>	<b>3</b>	<b>59</b>	<b>43</b>	<b>88</b>	<b>3</b>	<b>78</b>	<b>43</b>	<b>37</b>	<b>934</b>
<b><u>PROPERTY RIGHTS</u></b>																		
Right to Own Property	137	28	15	38	91	6	28	27	24	1	52	102	132	3	117	7	7	815
Inheritance	42	0	0	16	29	1	9	3	6	0	7	0	3	0	93	0	0	209
Destruction	8	2	0	4	22	3	3	10	2	0	11	0	9	0	28	2		104
Trespass/Encroachment	37	1	0	7	14	5	4	11	1	0	7	4	2	0	43	2	4	142
Title	0	0	0	5	1	0	0	0	1	0	0	2		0	1	0	0	10
Intestate Succession (PNDCL111)	11	0	0	4	7	15	20	0	2	0	0	6	38	0	26	0	2	131
<b>SUB-TOTAL</b>	<b>235</b>	<b>31</b>	<b>15</b>	<b>74</b>	<b>164</b>	<b>30</b>	<b>64</b>	<b>51</b>	<b>36</b>	<b>1</b>	<b>77</b>	<b>114</b>	<b>184</b>	<b>3</b>	<b>308</b>	<b>11</b>	<b>13</b>	<b>1411</b>
<b><u>ECONOMIC, SOCIAL AND CULTURAL</u></b>																		
Freedom of Worship/Religion	0	0	0	1	1	1	0	0	1	0	0	0	0	0	0	0		4
Right to Work	0	0	0	0	3	1	0	0	1	0	0	0	0	0	0	0	6	11
<b>Harmful Cultural Practices</b>																		
➤ Banishment	0	0	0	0	2	0	0	0	0	1		1	1	0	0	0	0	5
➤ Witchcraft Accusation/ Molestation	0	0	0	1	0	2	0	0	0	0	0	0	0	0	0	1		4
Right to Health	5	2	3	4	7	3	0	2	2	0	0	0	0	0	0	1	6	35
Right to clean and Healthy Environment	3	0	1	3	13	1	1	1	2	0	1	0	1	0	6	0	0	33
Right to housing/shelter	0	0	0	0	10	0	0	0	7	0	0	2	0	0	2	1		22
Right to Marry and found a family	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Forced Eviction	2	6	0	2	18	4	0	0	1	2	1	2	0	0	112	1		151
Breach of Agreement	207	0	0	24	156	13	110	132	4	0	42	85	20	0	148	8	66	1015
Tenancy	63	1	1	16	11	1	44	64	8	0	25	7	0	1	152	0	2	396
Threat of Life	0	4	2	0	18	0	0	0	1	0	0	0	0	0	5	0	3	33
Labour rights	52	21	9	15	51	43	61	8	32	4	20	38	5	1	48	24	9	441
Discrimination	0	0	0	0	5	1	0	0	2		1	2	0	0	0	1	0	12

Stigmatization	0	3	0	0	3	2	3	0	0	1	2	2	0	0	2	0	0	18
Others	12	29	18	9	48	39	33	17	20	4	6	24	3	0	77	17	8	364
<b>SUB-TOTAL</b>	<b>344</b>	<b>66</b>	<b>34</b>	<b>75</b>	<b>346</b>	<b>111</b>	<b>252</b>	<b>224</b>	<b>81</b>	<b>12</b>	<b>98</b>	<b>163</b>	<b>30</b>	<b>2</b>	<b>552</b>	<b>54</b>	<b>101</b>	<b>2545</b>
<u>CIVIL AND POLITICAL RIGHTS</u>																		
Right to Personal Liberty (Harassment)	12	12	14	2	41	4	29	4	4	0	9	2	0	0	28	5	7	173
Right to Dignity (Inhuman Treatment)	12	11	0	2	48	5	1	1	6	1	0	13	0	0	3	3	5	111
Right to vote	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	2
Freedom of Movement	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
Right to Privacy	0	0	0	0	0	0	0	0	0	0	0	2	0	0	4	0	0	6
<b>SUB-TOTAL</b>	<b>24</b>	<b>23</b>	<b>15</b>	<b>4</b>	<b>90</b>	<b>9</b>	<b>30</b>	<b>5</b>	<b>10</b>	<b>1</b>	<b>9</b>	<b>17</b>	<b>0</b>	<b>0</b>	<b>36</b>	<b>8</b>	<b>12</b>	<b>293</b>
<b>GRAND -TOTAL</b>	<b>851</b>	<b>179</b>	<b>216</b>	<b>299</b>	<b>1054</b>	<b>186</b>	<b>805</b>	<b>415</b>	<b>307</b>	<b>40</b>	<b>438</b>	<b>534</b>	<b>414</b>	<b>35</b>	<b>1307</b>	<b>171</b>	<b>272</b>	<b>7523</b>

## Appendix C: Nature of Administrative Justice Complaints Received According to Regions and Head Office

NATURE OF COMPLAINTS	BR	UW	UE	WR	VR	HOD	BE	AR	GR	NER	ER	CR	WNR	SAV	ASH	NR	OTI	TOT
<u>CESSATION OF EMPLOYMENT</u>																		
Premature Retirement	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
Unlawful Termination of Appointment	0	0	0	0	1	2	0	0	0	0	2	0	0	0	1	0	1	7
Unlawful Dismissal	1	1	0	0	3	7	0	0	0	0	1	0	0	0	0	0	0	13
Redundancy	0	0	0	0	0	2	0	0	0	0	0	0	0	0	1	0	0	3
<b>SUB-TOTAL</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>24</b>
<u>ENTITLEMENT</u>																		
Failure to pay salary	2	4		1	2	5	2	0	0	2	1		2	0	6	2	2	31
Unauthorized deductions of salaries	0	0	0	0	2	4	0	0	0	0	0	0	0	0	0	0	0	6

Failure to Pay Pension Allowances	0	0	0	0	0	4	0	0	1	0	0	0	0	0	0	0	0	5
Failure to pay End of Service Entitlement/benefit	0	0	0	0	1	4	0	0	0	0	0	0	0	0	4	1	0	10
Failure to pay allowances	0	2	1	0	0	4	0	0	0		2	1	0	0	1	0	0	11
Failure to Pay Transfer Grants	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
Investment Claims	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2
Compensation for Injury	0	0	0	0	1	0	0	0	1	0	0	0	0	0	2	0	0	4
SSNIT Benefit	3	1	0	0	2	0	0	0	0	0	0	0	0	0	1	0	1	8
SSNIT Contribution	0	0	3	0	1	1	0	0	0	0	1		0	0	0	0	0	6
<b>SUB-TOTAL</b>	<b>6</b>	<b>7</b>	<b>4</b>	<b>1</b>	<b>11</b>	<b>23</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>14</b>	<b>3</b>	<b>3</b>	<b>85</b>
<u><b>PROPERTY</b></u>																		
Arbitrary confiscation of property by State or Public Official		0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2
Destruction of property	0	0	0	0	1	2	0	0	0	0	0	0	0	0	0	1	0	4
<b>SUB-TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>6</b>
<u><b>COMPLAINT HANDLING/INVESTIGATIONS</b></u>																		
Failure to prosecute	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	5
Failure to act	0	0	1	0	0	5	0	0	2	0	0	0	1	1	1	0	0	11
Delay in Dispensing Justice	0	0	0	2	1	10	0	0	4	0	0	2	0	0	2	0	2	23
<b>SUB-TOTAL</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>39</b>
<u><b>OPPRESSIVENESS/ABUSE OF POWER</b></u>																		
Intimidation or Harassment	0	1	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	4
Assault by public officer	0	1	4	1	2	2	1	0	0	2	0	0	0	0	3	1	0	17
Unlawful Arrest/Detention	0	1	0	0	1	2	0	0	0	0	0	0	0	0	1	1	2	8
Abuse of Office	0	1	0	0	3	12	0	0	0	0	1	0	0	0	12	1	0	30
<b>SUB-TOTAL</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>7</b>	<b>16</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>16</b>	<b>4</b>	<b>2</b>	<b>59</b>

<b><u>SERVICE DELIVERY</u></b>																		
Negligence	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	2
<b><u>DISCIPLINE</u></b>																		
Suspension/Interdiction	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	2
Suspension from School	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
<b>SUB-TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>3</b>
<b><u>OTHER INJUSTICES</u></b>																		
Improper Withholding or seizure of documents	0	0	0	0	0	1	0	0	0	0	1	0	0	0	2	1	0	5
Denial of Promotion	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	0	2
Arbitrary Transfer	0	0	0	1	0	4	0	0	0	0	0	0	1	0	0	0	0	6
Discrimination	0	0	1	0	3	1	0	0	1	0	0	0	0	0	0	0	0	6
Denial of Bail	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Breach of Agreement	0	0	1	0	1	6	0	0	0	0	0	1	0	0	1	0	3	13
Refusal to Pay Medical Bills	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	3
Unfair Treatment	1	3	2	0	4	17	1	0	3	0	1	1	3	1	3	2	0	42
Others	1	2	7	0	2	6	0	0	1	0	1	1	0	0	4	6	1	32
<b>SUB-TOTAL</b>	<b>2</b>	<b>5</b>	<b>12</b>	<b>1</b>	<b>10</b>	<b>39</b>	<b>1</b>	<b>0</b>	<b>5</b>	<b>0</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>1</b>	<b>11</b>	<b>9</b>	<b>4</b>	<b>110</b>
<b>GRAND-TOTAL</b>	<b>9</b>	<b>17</b>	<b>21</b>	<b>6</b>	<b>34</b>	<b>113</b>	<b>4</b>	<b>0</b>	<b>13</b>	<b>4</b>	<b>11</b>	<b>8</b>	<b>8</b>	<b>2</b>	<b>49</b>	<b>17</b>	<b>12</b>	<b>328</b>

## Appendix D: Nature of Corruption Complaints Received According to Regions and Head Office

<b><i>ALLEGATIONS OF CORRUPTION</i></b>	<b>HQ</b>	<b>UW</b>	<b>UE</b>	<b>WR</b>	<b>VR</b>	<b>BR</b>	<b>BE</b>	<b>AR</b>	<b>GR</b>	<b>NE</b>	<b>ER</b>	<b>CR</b>	<b>WN</b>	<b>SAV</b>	<b>ASH</b>	<b>NR</b>	<b>OTI</b>	<b>TOT</b>
Bribery	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7
Misappropriation	1	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	4

Embezzlement	1	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	6
Extortion	0	0	0	2	2	0	0	0	1	0	0	0	0	1	5	1	0	12
Conflict of Interest	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4
Fraud	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2
Failure to Declare Assets	119	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	119
<b>SUBTOTAL</b>	<b>133</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>5</b>	<b>2</b>	<b>0</b>	<b>154</b>
<b>WHISTL- EBLOWER</b>	<b>HQ</b>	<b>UW</b>	<b>UE</b>	<b>WR</b>	<b>VR</b>	<b>BR</b>	<b>BE</b>	<b>AR</b>	<b>GR</b>	<b>NE</b>	<b>ER</b>	<b>CR</b>	<b>WN</b>	<b>SAV</b>	<b>ASH</b>	<b>NR</b>	<b>OTI</b>	<b>TOT</b>
Fraud	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Misappropriation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Abuse of office	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
<b>SUBTOTAL</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>4</b>
<b>GRAND TOTAL</b>	<b>134</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>158</b>

## Appendix E: Respondent Bodies in Human Rights Complaints Received

RESPONDENTS BODIES	<u>AR</u>	<u>WR</u>	<u>OTI</u>	<u>BER</u>	<u>SR</u>	<u>NER</u>	<u>NR</u>	<u>ASH</u>	<u>WRN</u>	<u>UW</u>	<u>CR</u>	<u>BR</u>	<u>GR</u>	<u>UE</u>	<u>ER</u>	<u>VR</u>	<u>HDO</u>	<u>TOT</u>
Associations/ unions	2	0	1	2	0	0	8	8	0	3	1	4	0	1	0	3	1	34
Banks/Financial Institutions	0	0	0	2	0	1	5	6	0	2	1	2	1	1	1	5	7	34
Churches	0	1	0	0	0	0	0	3	0	0	1	0	1	0	1	0	3	10
Chieftaincy Institution	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Embassy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4

Fuel Stations	0	0	0	0	0	0	0	1	0	1	1	0	0	0	0	0	0	3
Hotels	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	1	1	5
Insurance Companies	0	0	0	2	0	0	2	0	0	2	0	2	0	1	0	1	1	11
Private Individuals	411	284	270	784	35	38	155	1256	412	167	510	829	285	209	425	103 0	123	7223
Private Schools	0	1	0	1	0	0	0	3	0	0	4	4	0	1	2	3	6	25
Private Companies	2	9	1	8	0	1	0	18	0	3	14	4	18	1	7	8	31	125
Private Enterprises or Organizations	0	0	0	1	0	0	0	2	0	0	0	3	0	0	0	0	0	6
Private Hospitals	0	2	0	1	0	0	0	6	2	0	0	1	0	1	1	3	3	20
Security Companies	0	1	0	3	0	0	1	4	0	1	1	2	2	1	1	0	5	22
<b>TOTAL</b>	<b>415</b>	<b>299</b>	<b>272</b>	<b>805</b>	<b>35</b>	<b>40</b>	<b>171</b>	<b>1307</b>	<b>414</b>	<b>179</b>	<b>534</b>	<b>851</b>	<b>307</b>	<b>216</b>	<b>438</b>	<b>105 4</b>	<b>186</b>	<b>7523</b>

## Appendix F: Respondent Bodies in Administrative Justice Complaints Received

RESPONDENTS BODIES	AR	WR	OTI	BER	SR	NER	NR	ASH	WRN	UW	CR	BR	GR	UE	ER	VR	HDO	TOT
Accra Metropolitan Assembly (A.M.A)	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	3
Attorney General Department	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Audit Service	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	2
Banks	0	0	0	0	0	0	2	3	0	1	0	0	0	0	0	1	5	12
Controller & Accountant General	0	0	0	0	0	0	0	2	0	0	0	0	1	0	0	0	4	7
COCOBOD	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	1	0	3

CHRAJ	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	7
Department of Social Welfare	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Department of Community Development	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
DOVVSU	0	0	0	0	0	0	0	0	0	0	0	0	2	1	0	0	0	3
Environmental Protection Agency (EPA)	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
Environmental Health and Sanitation	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Electricity Company of Ghana(ECG)	0	0	0	0	0	0	0	3	0	1	0	0	0	0	1	3	2	10
Electoral Commission	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	0	2	5
Forestry Commission	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	1	0	3
Foods and Drug Broad Authority	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	2
Ghana Water Company Limited (G.W.C.L)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	5
Ghana Highway Authority	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Ghana Health Service	0	0	0	0	1	0	0	4	1	3	0	0	0	1	2	1	4	17
Ghana Air Force	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	5
Ghana Police Service	0	1	3	0	1	2	6	12	2	3	2	0	2	5	1	7	29	76
Ghana News Agency	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Ghana Irrigation Authority	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Ghana Refugee Board	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Ghana Armed Forces	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	4	5

Ghana Prisons Service	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	1	3
Ghana Fire Service	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	2
Ghana Education Service	0	1	0	1	0	0	2	3	2	4	1	2	0	2	2	2	5	27
Ghana Immigration Service	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	2
Ghana Identification Authority	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2
Ghana Broadcasting Corporation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Information Department	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Judicial Service	0	2	1	0	0	0	0	1	0	0	1	1	0	0	0	1	4	11
Legal Aid	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	2
Lands Commission	0	1	0	0	0	0	0	1	0	0	0	0	0	3	1	0	1	7
Labour Commission	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	3
Ministry of Defense	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Ministry of Local and Rural Development	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Ministry of Food And Agriculture	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1
Ministry of Trade and Industry	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Metropolitan, Municipal and District Assemblies (MMDAs)	0	0	4	2	0	1	1	4	1	0	2	1	0	4	0	10	2	32
Metro Mass Transit	0	0	0	0	0	0	0	1	0	3	0	0	0	0	0	0	1	5
National Accreditation Board	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
National Reconciliation Commission	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
National Service Secretariat	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	2
National Youth Employment	0	0	0	0	0	0	0	2	0	0	0	0	0	0	1	0	0	3



Programme (NYEP)																		
National Health Insurance Scheme (NHIS)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
National Theatre Ghana	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Nation Builders Corps (NABCO)	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
Public Service Commission	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	2
Rent Control Department	0	0	0	1	0	0	0	0	0	1	1	0	0	0	0	1	2	6
Regional Coordinating Council	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	2
State Housing Cooperation	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	2
Security Exchange Commission	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
SSNIT	0	0	2	0	0	0	2	1	0	0	0	2	0	1	1	1	6	16
Tertiary Institutions	0	0	0	0	0	0	1	1	0	0	0	1	0	0	1	0	2	6
Tema Development Company	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	2
Volta River Authority (VRA)	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Volta Aluminum Company Limited (VALCO)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
<b>TOTAL</b>	<b>0</b>	<b>6</b>	<b>12</b>	<b>4</b>	<b>2</b>	<b>4</b>	<b>17</b>	<b>49</b>	<b>8</b>	<b>17</b>	<b>8</b>	<b>9</b>	<b>13</b>	<b>21</b>	<b>11</b>	<b>34</b>	<b>113</b>	<b>328</b>

## Appendix G: Institutions of Officers to Whom Allegation of Corrupt Practices where Lodged Against

RESPONENTS BODIES	<u>AR</u>	<u>WR</u>	<u>OTI</u>	<u>BER</u>	<u>SR</u>	<u>NER</u>	<u>NR</u>	<u>ASH</u>	<u>WRN</u>	<u>UW</u>	<u>CR</u>	<u>BR</u>	<u>GR</u>	<u>UE</u>	<u>ER</u>	<u>VR</u>	<u>HDO</u>	
Banks	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
Ghana Police Service	0	1	0	0	0	0	0	4	0	0	0	0	0	0	0	1	0	6
Ghana Education Service	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Ghana Health Service	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	2
Judicial Service	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	5	119	125
Ministry of Foreign Affairs and Regional Integration	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Ministry of Finance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2
Metropolitan, Municipal and District Assemblies (MMDAs)	0	0	0	0	1	0	1	1	0	0	0	0	0	0	0	0	5	8
NADMO	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
The Government of the Republic of Ghana	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4
Private Individuals	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	3	2	7
<b>TOTAL</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>9</b>	<b>134</b>	<b>158</b>

## Appendix H: Mode of Closure of Human Rights Complaints

NATURE OF COMPLAINTS	NATURE OF CLOSURE					
<u>CHILDREN'S RIGHTS</u>	MEDIATION	DECIDED	DISCONTINUED	REFERRED	LACK OF MANDATE	TOTAL
Right of Access to Natural Parents	148	4	68	7	2	229
Right to Health	19	0	5	0	1	25
Right to Education	38	1	32	2	0	73
Child labour	1	0	3	1	0	5
Right to Paternity	51	2	33	3	2	91
Right to Maintenance (necessaries of life)	1075	9	462	36	11	1593
Inhuman Treatment (Right to dignity)	16	0	2	0	0	18
Child Trafficking	0	0	0	2	2	4
Right to Custody	84	2	57	68	37	248
Early and Forced Marriage	11	0	9	3	0	23
Right to Name	13	0	6	0	0	19
Defilement	0	0	0	2	15	17
<b>SUB-TOTAL</b>	<b>1456</b>	<b>18</b>	<b>677</b>	<b>124</b>	<b>70</b>	<b>2345</b>
<u>WOMEN'S RIGHTS</u>						
<i>Violence against Women</i>						
➤ Battery	43	0	33	9	7	92
➤ Emotional & Psychological	152	1	65	2	21	241
Sexual Harassment	3	0	2	1	0	6

Spousal Rights to maintenance	206	0	80	5	1	292
Reproductive Health Rights	164	0	70	5	1	240
Rape	0	0	0	0	2	2
<b>SUB-TOTAL</b>	<b>568</b>	<b>1</b>	<b>250</b>	<b>22</b>	<b>32</b>	<b>873</b>
<b><u>PROPERTY RIGHTS</u></b>						
Right to Own Property	485	10	236	46	20	797
Inheritance	107	6	85	11	9	218
Destruction	49	0	43	1	6	99
Trespass/Encroachment	73	1	38	9	6	127
Title	2	0	1	1	6	10
Intestate Succession PNDCL111	59	1	48	3	10	121
<b>SUB-TOTAL</b>	<b>775</b>	<b>18</b>	<b>451</b>	<b>71</b>	<b>57</b>	<b>1372</b>
<b><u>ECONOMIC, SOCIAL AND CULTURAL RIGHTS (ECOSOC)</u></b>						
Freedom of Worship/Religion	1	0	1	1	1	4
Right to Work	7	0	3	0	1	11
<b><i>Harmful Cultural Practices</i></b>						
➤ Banishment	3	1	0	0	0	4
➤ Witchcraft Accusation/Molestation	1	0	2	0	1	4
Right to Health	17	2	9	5	4	37
Right to clean and Healthy Environment	15	1	6	6	1	29
Right to Shelter	13	0	3	3	1	20
Right to Marry and found a family	0	0	1	0	0	1
Forced Eviction	80	6	61	5	10	162
Breach of Agreement	720	2	237	17	28	1004
Tenancy/Landlord Related Abuses	243	0	126	3	38	410

Right to Life	4	0	7	8	13	32
Labour Rights	228	14	119	6	37	404
Discrimination	5	0	5	1	1	12
Stigmatization	4	0	5	0	0	9
Others	112	12	66	14	93	297
<b>SUB-TOTAL</b>	<b>1453</b>	<b>38</b>	<b>651</b>	<b>69</b>	<b>229</b>	<b>2440</b>
<b><u>CIVIL AND POLITICAL RIGHTS</u></b>						
Right to Personal Liberty (Harassment)	87	2	50	7	8	154
Right to Dignity( Inhuman Treatment)	50	0	47	21	20	138
Right to vote	0	1	1	0	0	2
Freedom of Movement	0	0	3	1	0	4
Right to Privacy	5	0	0	1	0	6
<b>SUB-TOTAL</b>	<b>142</b>	<b>3</b>	<b>101</b>	<b>30</b>	<b>28</b>	<b>304</b>
<b>GRAND-TOTAL</b>	<b>4394</b>	<b>78</b>	<b>2130</b>	<b>316</b>	<b>416</b>	<b>7,334</b>

## Appendix I: Mode of Closure of Administrative Justice Complaints

NATURE OF COMPLAINTS	NATURE OF CLOSURE					
<u>CESSATION OF EMPLOYMENT</u>	MEDIATION	DECIDED	DISCONTINUED	REFERRED	LACK OF MANDATE	TOTAL
Premature Retirement	1	1	0	0	0	2
Unlawful Termination of Appointment	1	3	4	0	1	9
Unlawful Dismissal	1	2	4	1	1	9
Redundancy	0	0	0	0	2	2
<b>SUB-TOTAL</b>	<b>3</b>	<b>6</b>	<b>8</b>	<b>1</b>	<b>4</b>	<b>22</b>
<u>ENTITLEMENT</u>						
Failure to pay salary	8	6	18	1	3	36
Unauthorized deductions of salaries	1	0	1	0	2	4
Failure to Pay Pension Allowances	0	0	5	0	1	6
Failure to pay End of Service Entitlement/benefit	1	1	4	0	0	6
Failure to pay allowances	2	0	3	1	0	6
Failure to Pay Transfer Grants	1	0	0	0	0	1
SSNIT Benefit/Contribution	5	3	5	1	1	15
<b>SUB-TOTAL</b>	<b>18</b>	<b>10</b>	<b>36</b>	<b>3</b>	<b>7</b>	<b>74</b>
<u>PROPERTY</u>						
Destruction of property	2	0	1	0	0	3
<u>COMPLAINT</u>						

<u><b>HANDLING/INVESTIGATIONS</b></u>						
Failure to prosecute	0	0	3	0	2	5
Failure to act	1	2	5	2	1	11
Delay in Dispensing Justice	4	0	6	3	6	19
<b>SUB-TOTAL</b>	<b>5</b>	<b>2</b>	<b>14</b>	<b>5</b>	<b>9</b>	<b>35</b>
<u><b>OPPRESSIVENESS/ABUSE OF POWER</b></u>						
Intimidation or Harassment	1	1	2	0	1	5
Assault by public officer	0	3	6	2	2	13
Unlawful Arrest/Detention	2	1	6	2	0	11
Abuse of Office	7	5	21	0	3	36
<b>SUB-TOTAL</b>	<b>10</b>	<b>10</b>	<b>35</b>	<b>4</b>	<b>6</b>	<b>65</b>
<u><b>SERVICE DELIVERY</b></u>						
Negligence	0	0	1	0	1	2
<u><b>DISCIPLINE</b></u>						
Suspension/Interdiction	1	0	1	0	0	2
<u><b>OTHER INJUSTICES</b></u>						
Improper Withholding or seizure of documents	0	2	1	0	0	3
Denial of Promotion	3	1	0	0	0	4
Arbitrary Transfer	1	0	2	0	0	3
Discrimination	2	1	0	1	1	5
Denial of Bail	0	2	2	0	0	4
Breach of Agreement	2	0	2	2	5	11
Refusal to Pay Medical Bills	0	0	2	1	1	4
Stigmatization	0	0	1	0	0	1

Unfair Treatment	14	5	10	1	9	<b>39</b>
Others	2	5	8	1	4	<b>20</b>
<b>SUB-TOTAL</b>	<b>24</b>	<b>16</b>	<b>28</b>	<b>6</b>	<b>20</b>	<b>94</b>
<b>GRAND-TOTAL</b>	<b>63</b>	<b>44</b>	<b>124</b>	<b>19</b>	<b>47</b>	<b>297</b>

## Appendix J: Mode of Closure of Corruption Cases

	MODE OF CLOSURE			
NATURE OF ALLEGATIONS	DECIDED	LACK OF MANDATE	REFERRED	TOTAL
Misappropriation	8	0	0	<b>8</b>
Embezzlement	1	0	0	<b>1</b>
Extortion	9	1	1	<b>11</b>
Abuse of Office	2	1	1	<b>4</b>
<b>TOTAL</b>	<b>20</b>	<b>2</b>	<b>2</b>	<b>24</b>



## Appendix K: Sex Distribution of Complainants in Human Rights Complaints

NATURE OF ABUSES	MALE	FEMALE	TOTAL
<b><i>CHILDREN'S RIGHTS</i></b>			
Right of Access to Natural Parents	119	111	230
Right to Health	4	29	33
Right to Education	41	30	71
Child labour	0	3	3
Right to Paternity	30	59	89
Right to Maintenance (necessaries of life)	213	1349	1562
Inhuman Treatment (maltreatment)	5	13	18
Child Trafficking	2	1	3
Child Custody	153	117	270
Early and Forced Marriage	8	17	25
Right to Name	5	13	18
Defilement	12	6	18
<b>SUB-TOTAL</b>	<b>592</b>	<b>1748</b>	<b>2340</b>
<b><i>WOMEN'S RIGHTS</i></b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Violence Against Women			
➤ Battery	14	92	106
➤ Other Forms (Psychological, Emotional)	33	241	274
Spousal rights to maintenance	26	257	283

Reproductive Health Rights	42	219	261
Sexual Harassment	3	6	9
Rape	0	1	1
<b>SUB-TOTAL</b>	<b>118</b>	<b>816</b>	<b>934</b>
<b><i>PROPERTY RIGHTS</i></b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Right to Own Property	536	279	815
Inheritance	145	64	209
Destruction	84	20	104
Trespass/Encroachment	97	45	142
Title	8	2	10
Right to own Property (Intestate Succession PNDCL111)	46	85	131
<b>SUB-TOTAL</b>	<b>916</b>	<b>495</b>	<b>1411</b>
<b><i>ECONOMIC, SOCIAL AND CULTURAL RIGHTS (ECOSOC)</i></b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Freedom of Worship/Religion	2	2	4
Right to Work	9	2	11
Harmful Cultural Practices			
➤ Banishment	2	2	4
➤ Witchcraft Accusation/Molestation	1	3	4
Right to Health	7	30	37
Right to clean and Healthy Environment	21	8	33
Right to housing/shelter	6	14	22

Right to marry and found a family	0	1	1
Forced Eviction	94	67	151
Breach of Agreement	660	344	1015
Tenancy/Landlord Related Abuses	260	138	396
Right to Life	21	11	33
Labour Rights	284	120	441
Discrimination	6	6	12
Stigmatisation	13	5	18
Others	196	101	364
<b>SUB-TOTAL</b>	<b>1606</b>	<b>939</b>	<b>2545</b>
<b><i>CIVIL AND POLITICAL RIGHTS</i></b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Right to Personal Liberty (Harassment)	105	68	173
Right to Dignity (Inhuman Treatment)	33	78	111
Right to Vote	1	1	2
Freedom of Association	1	0	1
Right to Privacy	3	3	6
<b>SUB-TOTAL</b>	<b>143</b>	<b>150</b>	<b>293</b>
<b>GRAND-TOTAL</b>	<b>3,375</b>	<b>4,148</b>	<b>7,523</b>

## Appendix L: Sex Distribution of Complainants in Administrative Justice Complaints

NATURE OF INJUSTICE	MALE	FEMALE	TOTAL
<b><i>CESSATION OF EMPLOYMENT</i></b>			
Premature Retirement	1	0	1
Unlawful Termination of Appointment	5	2	7
Unlawful Dismissal	9	4	13
Redundancy	2	1	3
<b>SUB TOTAL</b>	<b>17</b>	<b>7</b>	<b>24</b>
<b><i>ENTITLEMENT</i></b>			
Failure to pay salary	19	12	31
Unauthorized deductions of salaries	4	2	6
Failure to Pay Pension Allowances	4	1	5
Failure to pay End of Service Entitlement	9	1	10
Failure to pay allowances	7	4	11
Failure to Pay Transfer Grants	2	0	2
Investment Claims	2	0	2
Compensation Injury	3	1	4
Failure to Pay SSNIT Benefit	6	2	8
Failure to Pay SSNIT contribution	5	1	6
<b>SUB-TOTAL</b>	<b>61</b>	<b>24</b>	<b>85</b>
<b><i>PROPERTY</i></b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	

Arbitrary confiscation of property by State or Public Official	2	0	2
Destruction of property	4	0	4
<b>SUB-TOTAL</b>	<b>6</b>	<b>0</b>	<b>6</b>
<b>COMPLAINT HANDLING/INVESTIGATIONS</b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Failure to prosecute	5	0	5
Failure to Act	8	3	11
Delay in Dispensing Justice	21	2	23
<b>SUB TOTAL</b>	<b>34</b>	<b>5</b>	<b>39</b>
<b>OPPRESSIVENESS/ABUSE OF POWER</b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Intimidation or Harassment	2	2	4
Assault by Public Officer	12	5	17
Unlawful Arrest/Detention	7	1	8
Abuse of Office	22	8	30
<b>SUB TOTAL</b>	<b>43</b>	<b>16</b>	<b>59</b>
<b>SERVICE DELIVERY</b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Negligence	2	0	2
<b>SUB TOTAL</b>			
<b>DISCIPLINE</b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	
Suspension/Interdiction	2	0	2
Suspension from School	1	0	1
<b>SUB TOTAL</b>	<b>3</b>	<b>0</b>	<b>3</b>
<b>OTHERS INJUSTICES</b>	<b><u>MALE</u></b>	<b><u>FEMALE</u></b>	

Improper Withholding or seizure of documents	4	1	5
Denial of Promotion	2	0	2
Arbitrary Transfer	5	1	6
Discrimination	3	3	6
Denial of Bail	1	0	1
Breach of Agreement	11	2	13
Refusal to pay Medical Bills	2	1	3
Unfair Treatment	37	5	42
Others	25	7	32
<b>SUB-TOTAL</b>	<b>90</b>	<b>20</b>	<b>110</b>
<b>GRAND-TOTAL</b>	<b>256</b>	<b>72</b>	<b>328</b>

## 5.2: Organizational structure

### Appendix P: Organogram

