

# TWENTY-SIXTH ANNUAL REPORT



COMMISSION ON HUMAN RIGHTS  
AND ADMINISTRATIVE JUSTICE



2019



## **Commission on Human Rights and Administrative Justice**

Twenty-sixth Annual Report  
2019



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-sixth Annual Report of the Commission for the period January 1 to December 31, 2019.

Yours sincerely,

**Joseph Whittal**  
Commissioner

## Commission Members



**Joseph Whittal**  
Commissioner



**Richard Quayson**  
Deputy Commissioner



# Table of Content

<b>LIST OF ACRONYMS.....</b>	<b>6</b>
<b>THE COMMISSIONER'S MESSAGE.....</b>	<b>8</b>
<b>2019 HIGHLIGHTS.....</b>	<b>10</b>
 <b>PART 1: OVERVIEW OF THE COMMISSION.....</b>	 <b>19</b>
1.1. Vision statement.....	19
1.2. Mission statement.....	19
1.3. Mandates.....	19
1.3.1. Human Rights.....	19
1.3.2. Administrative Justice.....	20
1.3.3. Anti-Corruption.....	20
1.4. Functions of the Commission.....	21
1.4.1. Original functions.....	21
1.4.2. Additional functions.....	22
1.5. Special Powers of investigation.....	23
1.6. Limitation on powers of investigation.....	23
1.7. Structure of the Commission.....	24
1.7.1. The Commission:.....	24
1.7.2. Senior Management:.....	24
1.7.3. Departments:.....	24
1.7.4. Autonomous units:.....	25
 <b>PART 2: STRATEGIC GOALS.....</b>	 <b>26</b>
2.1. Human Rights Mandate.....	26
Strategic goal 1: promote and protect fundamental human rights and freedoms.....	26
2.2. Administrative Justice Mandate.....	40
Strategic goal 2: Promote fair administration of public services and contribute to demand for better service delivery.....	40
2.3. Anti-corruption Mandate.....	51
Strategic goal 3: Promote and protect national integrity and investigate corruption.....	51
2.4. Management and administration.....	57
Strategic goal 4: Strengthen capacity to promote and protect human rights, national integrity, accountability, and ensure administrative justice.....	57

<b>PART 3: INTERNATIONAL COOPERATION.....</b>	<b>59</b>
3.1. Human Rights.....	59
3.2. Administrative Justice.....	61
3.3. Anti-Corruption.....	62
<b>PART 4: FINANCIAL REPORT.....</b>	<b>64</b>
<b>PART 5: APPENDICES.....</b>	<b>65</b>

# LIST OF ACRONYMS

AAACA	Association of Anti-Corruption Agencies in Commonwealth Africa
AC	Anti-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
CEFM	Child, Early and Forced Marriage
CHRAJ	Commission on Human Rights and Administrative Justice
CLFZ	Child Labour Free Zone
CPRs	Civil and Political Rights
CSOs	Civil Society Organisations
ESCRs	Economic, Social and Cultural Rights
EU	European Union
FGM	Female Genital Mutilation
GACC	Ghana Anti-Corruption Coalitions
GANHRI	Global Alliance of National Human Rights Institutions
HR	Human Rights
IAACA	International Association of Anti-Corruption Authorities
ICC	International Coordinating Conference
IHRD	International Human Rights Day
IOI	International Ombudsman Institute
IPs	Implementing Partners
IWD	International Women's Day
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
MoU	Memorandum of Understanding
NIRM	National Institutions and Regional Mechanisms
NITA	National Information Technology Agency
OHCHR	Office of the High Commissioner for Human Rights
OPCAT	Optional Protocol on the Convention Against Torture
OSIWA	Open Society Initiative for West Africa
NACAP	National Anti-Corruption Action Plan

NACIWA	Network of African Anti-Corruption Institutions in West Africa
NACoRD	National Anti-Corruption Reporting Dashboard
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
PE	Public Education
PLHIV	Persons Living with HIV
PIT	Project Implementation Team
PSRRP	Public Sector Reform for Results Project
SDGs	Sustainable Development Goals
SDRS	Stigma and Discrimination Reporting System
SCA	Sub-Committee on Accreditation
SE	Selected Entities
SOGIE	Sexual Orientation, Gender Identity and Expression
SSNIT	Social Security and National Insurance Trust
UCC	University of Cape Coast
UNCAC	United Nations Conventions Against Corruption
UNSDP	United Nations Sustainable Development Partnership
UPR	Universal Periodic Review
WAPCASS	West African Project to Combat AIDs and STIs

## THE COMMISSIONER'S MESSAGE

It has always been a delight to have the opportunity to present to the Parliament of Ghana, the Annual Report of the Commission on Human Rights and Administrative Justice (CHRAJ). The 2019 report is the 26th edition since the establishment of the Commission.

In the reporting year, the Commission's experience in ensuring good governance over the years was manifested in key developmental roles played locally and internationally to promote and protect human rights, transparency and accountability in the country and beyond.

On the international front, the Commission was re-elected as Chair of the 2030 Agenda for Sustainable Development Goals and Africa Agenda 2063 Working Group at the Biennial Conference of the Network of African Human Rights Institutions in Egypt. At the same conference, the CHRAJ was elected as an Alternate member of the Sub-Committee on the Accreditation (SCA) of the Global Alliance for National Human Rights Institution (GANHRI) and the Office of the High Commissioner for Human Rights Sub-Committee on Accreditation. This earns CHRAJ the enviable position as Africa representative on the SCA for the accreditation of National Human Rights Institutions across the world.

Again, the Commissioner of CHRAJ was elected as the President Network of National Human Rights Institutions in West Africa (NNHRI-WA) in its 2019 Annual Conference held in Accra. Most significant about this new position was the movement of the Secretariat of the Network from Abuja, Nigeria to Accra, Ghana; hosted by the Commission.

Owing to the exemplary execution of CHRAJ's mandate, the National Human Rights Commission of the Gambia and the Independent Electoral Commission of Uganda were in Ghana to understudy the Commission.

In addition to these international dimensions for which the Commission fostered leadership in 2019, CHRAJ served in diverse capacities at the national level.

Most importantly was inclusion of the Commission's Administrative Justice function as a beneficiary of the sixteen Selected Entities (SE) to benefit from the Public Sector Reform for Results Project (PSRRP); a government project with funding from the World Bank.

---

The role of the CHRAJ under the PRSSP is to contribute to improving efficiency and accountability in the delivery of public services through grievance redress and complaints handling for administrative services.

The Commission is a member of the SDGs Implementation Coordinating Committee and acts as technical advisor on rights-based approach to the SDGs implementation, monitoring and reporting at the national level.

The Commission continues the co-ordination and monitoring of implementation of the National Anti- Corruption Action Plan (NACAP) in the public and private sectors, which is consonance with target 5 of the SDG 16 “Substantially reduce corruption and bribery in all their forms”. The Commission has issued the 2019 NACAP implementation report and is happy to indicate that there is an increase in the number of public and private institutions reporting on their activities under NACAP.

The Commission also developed a 5-year strategic plan to be implemented in 2021 to reset its strategic direction in the next five years.

I want to acknowledge the government and development partners for their funding support in the Commission’s work and encourage them to do more.

I also commend the invaluable efforts of the Commission’s staff which has brought us this far.

In conclusion, the year 2019 saw the Commission advance its international visibility and rightfully position itself within the country to ensure respect for human rights, transparency and accountability and good governance.



**Joseph Whittal**  
Commissioner

## 2019 HIGHLIGHTS

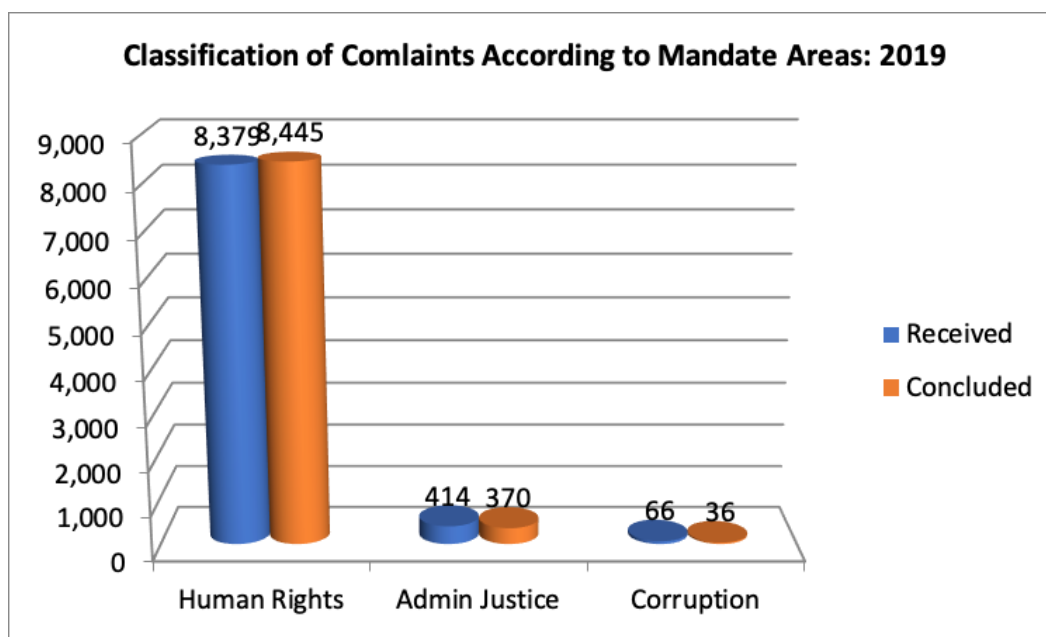
The strategic goals of the Commission drawn from the three thematic mandate areas (human rights, administrative justice, and anti-corruption) as well as the operational/functional mandate areas such as investigations, legal services, research, and public education, have guided the CHRAJ 2019 programme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

In the year under review, the Commission developed a 5-year strategic plan to reset its strategic direction in the next five years commencing in the year 2021. Thus, subsequent annual reports will reflect the focus of the CHRAJ in this new strategic document.

The Commission received 8,859 complaints in 2019 as against 9,521 in 2018; showing a 7% decrease with respect to the previous year. Additionally, 3,061 complaints were carried over from 2018, bringing the total complaints in 2019 to 11,920. The Commission successfully investigated and concluded 8,851 representing 74.3% of the total complaints. A total of 3,069 cases, constituting 25.7% of total complaints were pending investigation at the end of the reporting period.

Eight thousand three hundred and seventy nine (8,379) complaints representing 94.6% of the complaints received in the reporting year were classified under Human Rights while 414 (4.7%) and 66 (0.7%) were Administrative Justice and allegations of Corruptions respectively. See the diagram below for details.

**Fig 1: Complaints Received and Concluded  
According to Mandate Areas**



### Human Rights Mandate

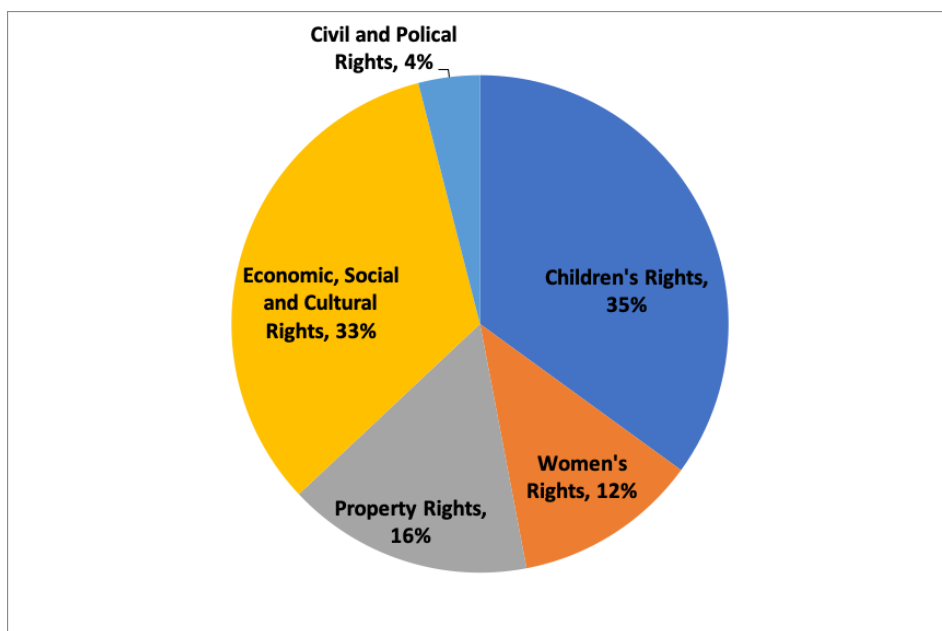
The total number of human rights complaints received in 2019 was 8,379. Complaints investigated and concluded which includes carried over cases from 2018 was 8,445 showing a decrease of 3.1% as compared to the 2018 figure of 8,714.

Three thousand four hundred and twenty (3,420) complaints, representing 40.8% of total complaints received were reported by males; whereas 4,959, constituting 59.2% were reported by females.

The nature of human rights abuses were categorized into: Children's rights; Women's rights; Property rights; Economic, Social and Cultural Rights; and Civil and Political Rights. See fig. 2 below for the percentages.

Eight thousand three hundred and seventy nine (8,379) complaints representing 94.6% of the complaints received in the reporting year were classified under Human Rights while 414(4.7%) and 66 (0.7%) were Administrative Justice and allegations of Corruptions respectively. See the diagram below for details.

**Fig 2: Categories of Nature of Human Rights Complaints**



### Human Rights Education

During the reporting year, the Commission organized 3,966 public education programs on fundamental human rights and freedoms nationwide covering topics such as harmful cultural practices like child early and forced marriages, torture, right to education and health, parental responsibilities, and child labour.



### **SDG Implementation and Monitoring**

The Commission in efforts towards monitoring the SDGs implementation in Ghana participated in a capacity building training on monitoring of the UPR and SDGs by the OHCHR for selected staff of CHRAJ and other stakeholders including government institutions, and CSOs during the reporting period.

### **MoU between CHRAJ and UCC on Annual Human Rights Lectures**

During the year, the Commission held consultations with members of University of Cape Coast Faculty of Law resulting in the preparation of a memorandum of understanding (MoU) between the two institutions. The main purpose of the MoU is for the two institutions to hold joint Annual Human Rights lectures on topical issues. The said MOU has since been signed by both parties.

### **National Consultations on Criminal Justice Reforms**

CHRAJ, with support from NANHRI convened a multi-sectoral national consultation on criminal justice reforms in April 2019 in Accra, under the theme “National Strategies for the Implementation of the African Commission on Human and Peoples Rights (ACHPR) Principles on the Decriminalisation of Petty Offences in Africa”. The overall aim of the programme was intensify collaboration between NHRIs and other State actors in the criminal justice system to explore alternative ways of dealing with petty offences.

### **National Steering Committee on Child Labour**

The Commission as a member of the National Steering Committee on Child Labour participated in various activities leading to the development of protocols and guidelines on declaring Child Labour Free Zone (CLFZ). The overall goal is to ensure that Local Government Authorities as well as chiefs and opinion leaders of communities own the child labour eradication agenda, develop and implement holistic, well-integrated, consistent and high-yielding interventions that will lead to eradication of child labour and total development of children. NHRIs and other State actors in the criminal justice system to explore alternative ways of dealing with petty offences.

### **Development of Educational Materials**

The Commission drafted educational materials to produce leaflets on the right to life, health, education, housing and shelter, and freedom of expression. These materials were simplified to enable users understand the various human rights issues and to empower them to hold duty bearers accountable.

### **Collaboration with WAPCAS**

The Commission entered into a memorandum of understanding with the West African Project to Combat AIDs and STIs (WAPCAS) in January 2019 to support aspects of its work including revamping its Stigma and Discrimination Reporting System (SDRS) which has been out of use since 2017. The newly built system provides three (3) main ways (online, SMS and digital map) for Lesbians, Gays, Bisexual/Transgender, Intersex, Gender Non-Conforming (LGB\TIGNC) Community and other key populations to lodge complaints in confidence to assigned staff of the Commission.

Also, CHRAJ participated in the launch of the National Human Rights Intervention Programme in March by WAPCAS in Accra to educate, PLHIV, and LGB/TIGNC community on access to health and justice. The programme had about 250 participants, including peer educators/counsellors, community members, the Police, Traditional Leaders, and the media in attendance.

### **Administrative Justice Mandate**

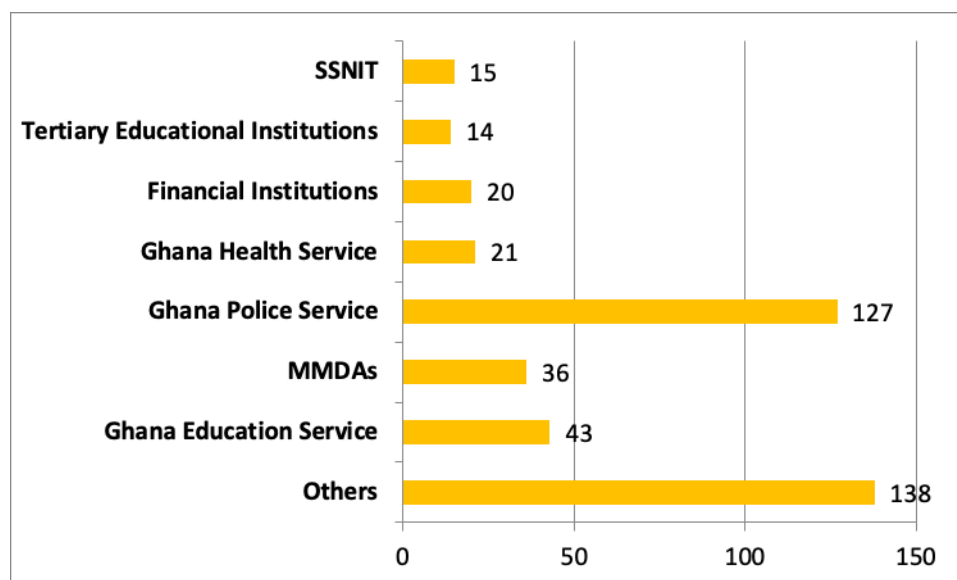
The Commission received and classified 414 complaints under this mandate but investigated and concluded 370. The complaints received showed a decrease of 1.2% as compared to the previous year's complaints of 419 but the concluded was higher than the previous year's figure of 331 by 11.8%.

The nature of complaints was mostly in the areas of non-payment of entitlements/claims, injustice (unfair treatment by public officials) and oppression or abuse of power (abuse of office).

Three hundred and thirty three (333) complaints, representing 80.4% of total complaints received were reported by males; the remaining 81, constituting 19.6% were reported by females.

Administrative Justice Complaints were lodged against the Public Institutions in the country. Figure 3 below is a graph showing the number of complaints lodged against the respective institutions.

**Fig. 3: Respondent Institutions**



Key respondents that constitute the “other” category in the diagram above comprise of Controller and Accountant General Department, Judicial Service, Department of Social Welfare, Ghana Water Company, Metro Mass Transit, Electricity Company of Ghana (ECG), NADMO, National Youth Employment Programme (NYEP), Ghana Armed Forces Forestry Commission, CHRAJ and Ghana Broadcasting Corporation.

In addition to investigations, the Commission organized a total of 1,020 public education activities to promote fair administrative principles and good conducts in public service delivery covering issues on good administrative principles and conducts, and maladministration.

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

The Administrative Justice mandate of the Commission is one of the public sector institutions benefitting from the government of Ghana PSRRP Project. The overall objective of the PSRRP is to improve efficiency and accountability in the delivery of selected services by Selected Entities (SEs). The SEs refers to sixteen (16) MDAs participating in the project, including the Commission. The others are Driver and Vehicle Licensing Authority (DVLA); Passport Office; Ghana Immigration Service; Environmental Protection Agency; Births and Deaths Registry; Ministry of Transport; Ministry of Foreign Affairs and Regional Integration; Ministry of Interior; Ministry of Environment, Science and Technology and Innovation; Ministry of Local Government and Rural Development; Ministry of Monitoring and Evaluation, Office of the Head of Civil Service, Public Services Commission; National Information Technology Agency (NITA), and the Office of the Senior Minister.

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

In the reporting year, the Commission undertook the following activities under the PSRRP Project:

- Preparation and submission of the following documents to the PMU and the World Bank:
  - i. The 2019 and 2020 Annual work plans.
  - ii. Terms of reference to engage a Consultant to review CHRAJ existing grievance redress and complaint handling policies, procedures and actual practices, including the complaint handling manual and other administrative policies; and
  - iii. A procurement plan.
- Held meetings with the World Bank Team and PMU members in September to discuss the scope of work of CHRAJ and how to speed up implementation process; and had a meeting with I.T. Specialists from NITA on the development of terms of reference for a web and mobile applications based complaints handling systems for purposes of improving the ability of users to access CHRAJ services with ease.

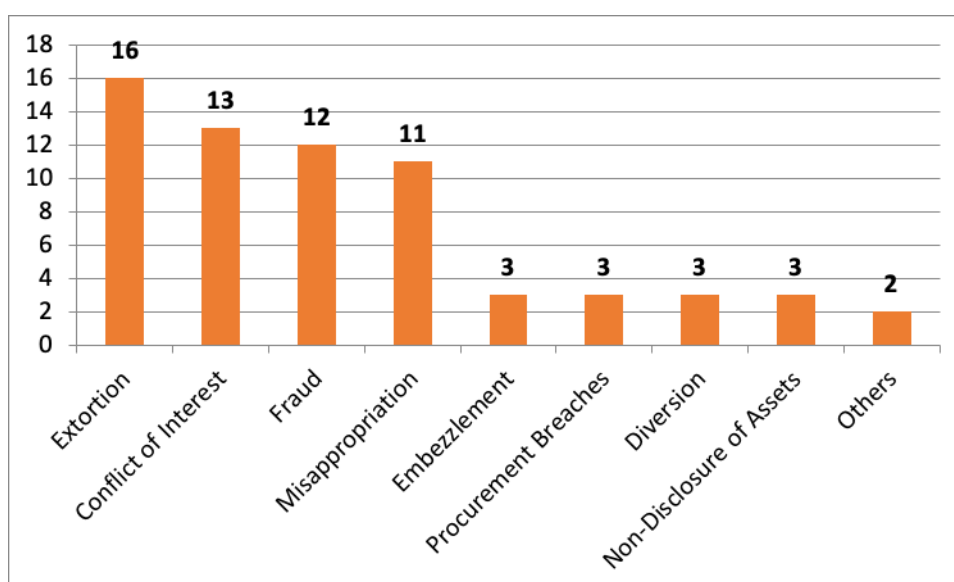
- Participated in a 1-day PMU/PSRRP meeting in January in Accra; a 2-day PMU/PSRRP/World Bank Training Workshop in September in Koforidua; and PIT Coordinators meeting in November in Accra.

### Anti-corruption mandate

The Commission classified a total of 66 cases under this mandate which was higher than the previous years' figure of 62 by four (4). Thirty-six (36) cases were investigated and concluded in the reporting year as compared to 31 in the previous year showing 16.1% increase.

The nature of the allegations of corrupt practices and respective number of cases has been represented on the fig. 4 below.

**Fig. 4: Nature of Allegations of Corruption**



### Public Education

Anti-corruption public sensitization in the regions and districts during the year under review recorded a total of 1,652. The activities covered issues relating to the Code of Conduct for Public Officers as stipulated in Chapter 24 of the 1992 Constitution and other corruption related offences.

### Capacity Building for Staff on Anti-Corruption Education

As part of a range of targeted institutional support to CHRAJ under the European Union (EU) funded Accountability, Rule of Law and Anti-Corruption Programme (ARAP), a consultant was engaged to provide capacity building for staff who undertake PE in the Commission. Overall, the training benefited 135 staff, comprising 11 officers from the head office, 10 Regional Directors, 2 Sub-Regional Directors, 13 PE Focal Persons and 99 District Directors.

### **Basic Investigation Techniques, Ethics, Integrity and Human Rights Training**

In line with CHRAJ role under NACAP, a number of trainings on Basic Investigation Techniques, Ethics, Integrity and Human Rights were organized for over 200 staff across the country. The trainings were aimed at increasing the capacity of the Commission to deliver on its mandates.

### **Preparation of NACAP Work Plan 2020-2021**

In the reporting year, the Commission coordinated and participated in a Technical Committee meeting to develop a draft annual work plan (AWP) for 2019 and 2020, which was presented to the Monitoring and Evaluation Committee (MONICOM) of the NACAP. Thereafter, the Commission held a Joint meeting of the NACAP High Level Implementation Committee (HiLIC) and the MONICOM to consider and approve the AWP.

### **Preparation and Dissemination of 2018 NACAP Annual Progress Reports**

In 2019 the Commission constituted a Technical Working Group to prepare a draft Annual Progress Report (APR) on NACAP for the consideration of MONICOM. After MONICOM's consideration, the draft was validated and approved at a Joint Meeting of HiLIC and MONICOM, and copies subsequently printed for dissemination.

### **Capacity Building on NACAP National Anti-Corruption Reporting Dashboard [NACoRD]**

Subsequent to the official launch of the NACoRD, an online monitoring and reporting platform, in 2018; the Commission between January and March 2019 organized trainings for NACAP focal persons of Municipal, Metropolitan and District Assemblies (MMDAs), Ministries, Departments and Agencies (MDAs), Civil Society, and the private sector. The training benefited a total of 322 focal persons and augmented the capacity of these institutions in the use of the platform to report effectively on NACAP activities.

### **Capacity Building for NACAP Implementing Institutions**

As part of efforts to enhance the capacity of IPs, the Commission during the period under review facilitated training workshops organised by the Drivers and Vehicle Licensing Authority (DVLA), the Office of the Attorney-General and Ministry of Justice (A-G) and the Ghana Refugee Board.

### **Collaboration with the Ghana Anti-Corruption Coalitions (GACC)**

At a programme organized by GACC in November 2019, CHRAJ made a presentation on the role of women in anti-corruption, how UNCAC and NACAP account for women in the fight against corruption and efforts to mainstream gender into past and ongoing anti-corruption strategies. Other panelists were from Centre for Democratic Development, and Ghana Institute of Management and Public Administration Law Faculty.

### **Management and Administration**

The Commission staff strength stood at 696. The figure as compared to 2018 staff strength of 667 indicated an increase in staff by twenty-nine (29) persons.

## **International Cooperation**

The Commission continue to advance 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 and global performance generally. The Commission is a member of the following bodies:

- Global Alliance of National Human Rights Institutions (GANHRI);
- International Ombudsman Institute (IOI);
- International Association of Anti-Corruption Authorities (IAACA);
- Network of African National Human Rights Institutions (NANHRI);
- African Ombudsman and Mediators Association (AOMA);
- Association of African Anti-Corruption Authorities (AAACA);
- Network of National Human Rights Institutions in West Africa (NNHRI-WA); and
- Network of Anti-Corruption Institutions in West Africa (NACIWA).

The CHRAJ continues to enjoy 'A status' membership with the GANHRI; which signifies that the Commission is 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 continues to serve as Africa's Representative on the GANHRI Working Group on the United Nations Sustainable Development Goals (SDGs) and Chairman of the NANHRI Working Group on SDGs and Africa Agenda 2063.

Also, the Commissioner of CHRAJ was elected as President of the Network of National Human Rights Institutions in West Africa (NNHRI-WA) during its 2019 Annual General Assembly meeting in Accra in May 2019. The NNHRI-WA Secretariat was also moved from Abuja, Nigeria to Accra, Ghana. The Secretariat serves as the focal point for exchange and dissemination of information, documentation and reporting among the Network members.

### **Other regional and international relations work include the following:**

In January, 2019, the Commission attended the NANHRI Working Group on Agenda 2030 for Sustainable Development and African Agenda 2063 meeting in Nairobi, Kenya. The meeting had two objectives, namely; to reflect on the Working Group terms of reference and progress; and to identify priorities and adopt a work plan for the year 2019. As part of the meeting, participants went on a study tour to the Kenya Human Rights Commission (KHRC) for purposes of understudying how the KHRC mainstreamed implementation and monitoring of the SDGs into its work, especially with the assistance of technology. Following the study tour, the Commissioner of CHRAJ subsequently led a two-member technical team to KHRC for a detail study of their operations, particularly in terms of leveraging technology for work design and implementation. The outcome of this technical tour was that the Commission decided to adopt the KHRC system. Thus, in December 2019 a 2-member technical team (resource persons) from the KHRC came to

---

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



understudy the Commission's manual system and also made presentations on the KKHR system to the staff of the Commission. The key objective was for the staff to buy into the system, and more importantly, enable them to relate to the system in terms of facilitating task accomplishment.

In June 2019, the Commission hosted all five (5) newly appointed Commissioners of the Gambia National Human Rights Commission (NHRC), who were in Ghana on a study tour of CHRAJ.

Also, the CHRAJ participated in international and regional conferences including: the ECOWAS Human Rights Day and Extraordinary Meeting in Abuja, Nigeria in January 2019; a training workshop on Human Rights Mechanisms in Switzerland in May 2019; a High Level Political Forum on SDGs in New York, USA in July 2019; the Fifth Session of the African Regional Forum on Sustainable Development in Marrakesh, Morocco in April 2019; the 3rd African Union Commission-NANHRI Policy Forum on the State of African NHRIs in Addis Ababa, Ethiopia in September 2019; the maiden International Ombud Expo programme in October 2019 in Abuja, Nigeria; and the conference on International Exchange Experience on Administrative Justice in Judicial review in Madrid, Spain in November 2019.

## **Finance**

The Commission was granted Parliamentary approval to spend the sum of Thirty-one million, eight hundred and forty-eight thousand, seventy Ghana cedis and fifty pesewas (the GH¢31,848,070.50) on compensation, goods and services and assets during reporting year. Analysis of releases and approved budget however indicate a shortfall of Four million, forty-three thousand, six hundred and twenty-eight Ghana Cedis and ninety-four Pesewas (GH¢4,043,628.94)

---

## **PART 1: 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. The Commission therefore is:

- a National Human Rights Institution;
- an Ombudsman; and
- an Anti-corruption Agency.

The Commission draws on the fore going 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 subjection 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, on the basis of its operational and thematic mandates currently has in its organisational structure as follows:

#### **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 who are heading the various ten (10) departments of the Commission.

#### **1.7.3. Departments:**

Previously, there were seven major departments. The new structure has made space for three more, making it possible for the crosscutting functions and departments which were before subsumed under other departments to have visibility and more room to operate. 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.

#### **1.7.4. Autonomous units:**

The new organogram has also made provision for 6 autonomous units, namely:

- 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 2: STRATEGIC GOALS

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

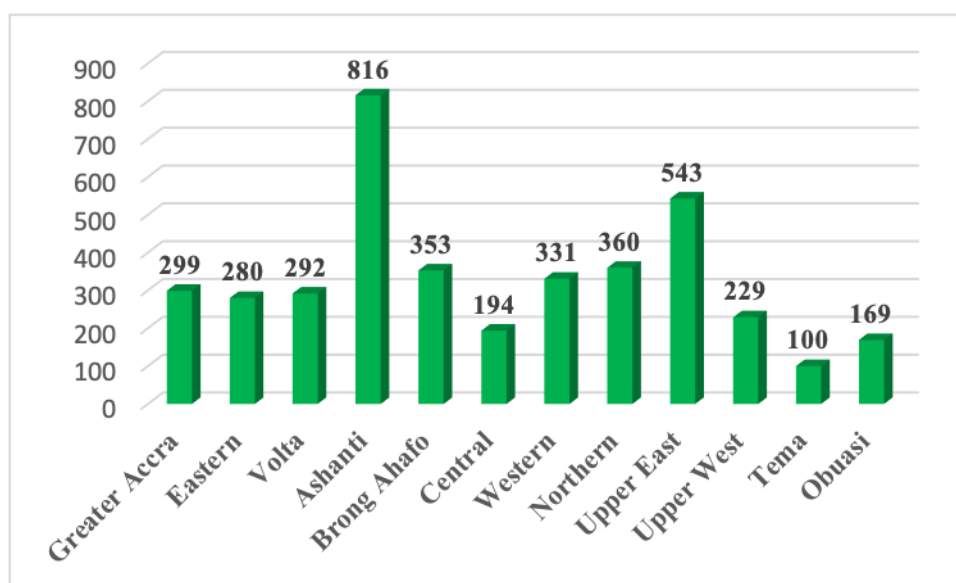
- Promoting and protecting the rights of the vulnerable including, women, children and persons with disabilities; the right to work and employment; civil and political rights (CPRs); economic, social, and cultural rights;
- Incorporating human rights principles and standards in national development programming;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

The following activities were implemented under the Human rights mandate:

#### Human Rights Education

During the reporting year, the Commission organized 3,966 public education programs on fundamental human rights and freedoms nationwide covering topics such as 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.

**Fig 5: Regional Distribution of Public Educational Activities**





### **Consultations on the United Nations Sustainable Development Partnership**

The Commission participated in “Joint Programming Consultations on The United Nations Sustainable Development Partnership (UNSDP)” from December 2019 in Accra under the auspices of The United Nations Office of The Resident Coordinator. The Joint Programming Consultations provided an opportunity to review and discuss the UN joint work plans (JWPs). The JWPs which outlined the key areas in which the UN is collectively working with CHRAJ and other institutions represent an important milestone in the implementation of the UNSDP, which was signed between the UN and the Government of Ghana in June 2018.

The High-level Ministerial Committee on SDGs plays the oversight role for the UNSDP implementation. This was the first time that the UN in Ghana developed JWPs on its development support to government. Accordingly, the meeting was aimed at creating a platform for engagement with all Ministries, Departments and Agencies which partner with the UN for implementation of the UNSDP; providing an opportunity for participants to agree on priorities for 2020 and strengthen alignment between UN action and government priorities; and seeking to incentivize the creation of synergies across institutions for a coherent and synergistic implementation of the 2030 agenda in Ghana.

### **SDG Implementation and Monitoring**

The Commission in efforts towards the monitoring of SDGs implementation in Ghana, participated in a capacity building training on monitoring of the UPR and SDGs by the OHCHR for selected staff of the Commission and other relevant stakeholders including government institutions, and CSOs during the reporting period.

### **MoU between CHRAJ and UCC on Annual Human Rights Lectures**

During the year, the Commission held consultations with members of Faculty of Law, University of Cape Coast (UCC) resulting in the joint preparation of a memorandum of understanding (MoU) between the two institutions in April 2019. The main purpose of the MoU is for the two institutions to hold joint Annual Human Rights lectures on topical issues. The said MOU has since been signed by both parties.

### **Workshop on International and Regional Human Rights Protection**

With the goal of enhancing the knowledge of staff on international and regional human rights protection mechanisms, the Commission organised a 2-day training workshop on international and regional human rights protection for selected departmental and Unit staff in March 2019.

### **National Consultations on Criminal Justice Reforms**

CHRAJ, with support from NANHRI convened a multi-sectoral national consultation on criminal justice reforms in April 2019, under the theme “National Strategies for the Implementation of the African Commission on Human and Peoples Rights (ACHPR) Principles on the Decriminalisation of Petty Offences in Africa”. The consultation which took place in Accra, Ghana was under the overall aim of intensifying collaboration



between NHRIs and other State actors in the criminal justice system, as well as CSOs to explore alternative ways of dealing with petty offences. It also provided a platform for participants to build momentum on principles of the ACHPR on decriminalizing petty offences in Africa, detention monitoring guidelines and to develop an action plan for the implementation of the ACHPR's principles. As a follow up activity, participants undertook a study tour to the Nsawam Medium Security Prisons to familiarize themselves with the conditions of detention and the Prison's compliance with the Luanda Guidelines focusing specifically on petty offenders in pre-trial detention.

### **Launch of Campaign to Decriminalize Petty Offences**

In December 2019, the Commission in collaboration with the Commonwealth Human Rights Initiative and the Open Society Initiative for West Africa (OSIWA) launched the campaign to promote the decriminalization of petty offences in Ghana. The launch which was under the theme, "Decriminalising poverty; Advocating for reform of petty offences in Ghana", was to initiate dialogue on the need to mainstream decriminalization of petty offences into the ongoing justice reform programme and ensure a more holistic approach to the process.

### **National Steering Committee on Child Labour**

The Commission as a member of the National Steering Committee on Child Labour participated in various activities leading to the development of protocols and guidelines on declaring Child Labour Free Zone (CLFZ). CHRAJ chaired the Sub-Committee on Policy Planning, Implementation, Monitoring and Evaluation, and led all the processes that gave birth to the document. The overall goal of the CLFZ is to ensure that Local Government Authorities as well as chiefs and opinion leaders of communities own the child labour eradication agenda, develop and implement holistic, well-integrated, consistent and high-yielding interventions that will lead to the eradication of child labour and total development of children.

### **Statistical Analysis on State of Human Rights**

The Commission conducted a statistical analysis on the state of human rights and the other mandate areas during the year under review. The objective of the exercise was to examine the national and regional breakdown of complaints pertaining to human rights, including the other thematic areas; and by means of recommendations, draw attention to relevant issues as well as commonly reported and underreported cases.

### **Sensitization on Early and Forced Marriage and Female Genital Mutilation**

The Commission collaborated with the National Council of Zongo Chiefs to organize series of sensitization programmes on harmful traditional practices such as Child Early and Forced Marriage and Female Genital Mutilation in Ghana. The programmes which were under the theme, "the dignity of women and girl child", were organized in specific communities in Accra such as; Ashiaman, Amasaman and Madina. Target participants included Muslim Chiefs, Queen mothers, Women and Youth leaders. The main aim was to sensitize the target groups on the harmful effects of these practices and to enlighten them that the practice was a gross violation of the fundamental human rights and freedoms of the victims.

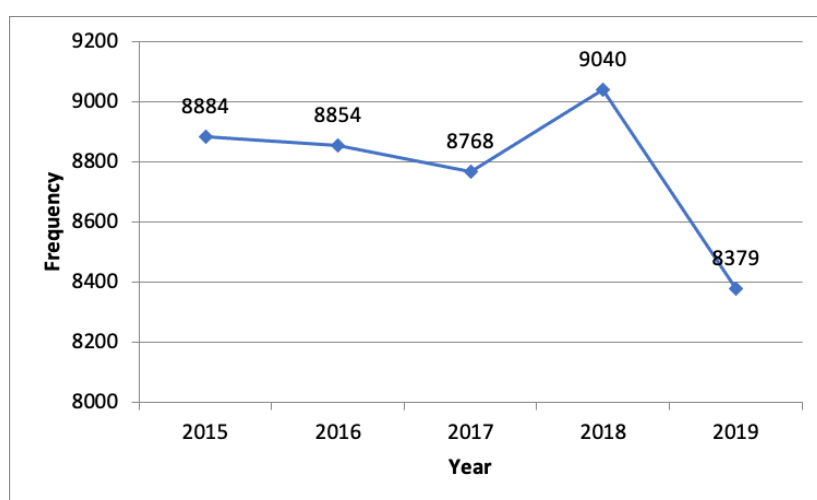
## Development of Educational Materials

The Commission drafted educational materials to produce leaflets on the right to life, health, education, housing and shelter, and freedom of expression. These materials were simplified to enable users understand the various human rights issues and to empower them to hold duty bearers accountable.

## Receipt of complaints

In the year 2019, the Commission received eight thousand three hundred and seventy-nine (8,379) complaints in relation to Human Rights as against nine thousand and forty (9,040) in the previous year, showing 7.3% decrease. See fig 6 below, the trend of complaints over the past five year.

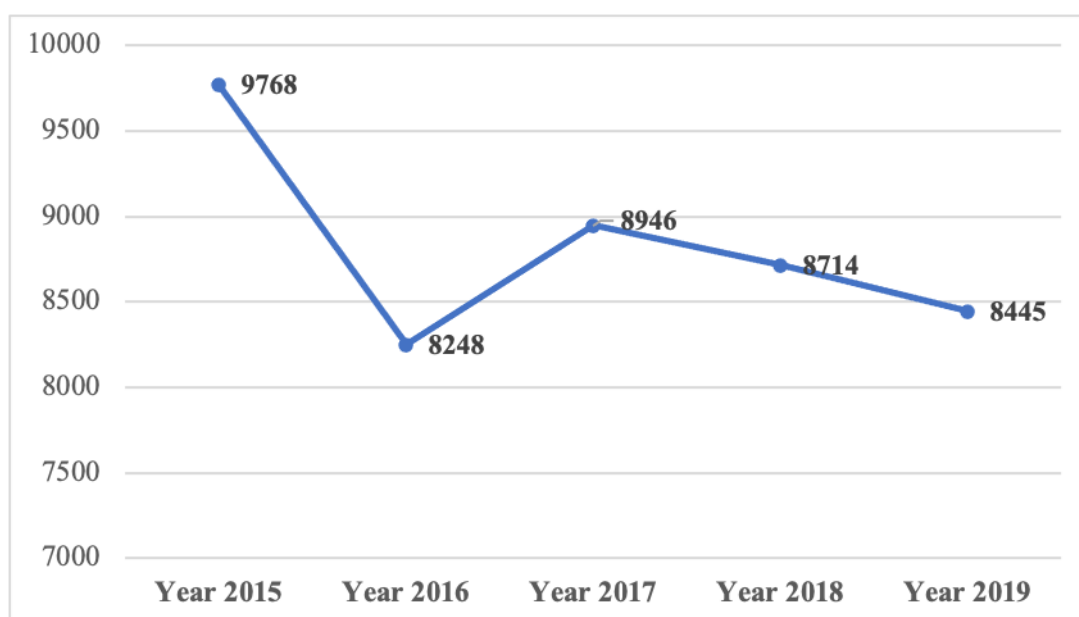
**Fig 6: Trend of Receipt of Human Rights Complaints: 2015-2019**



## Complaints Concluded: 2019

The Commission concluded 8,445 complaints which were lower than the previous year's figure of 8,714 by 3.1%. During preliminary investigations or assessment, 980 complaints representing 11.6% of complaints concluded were either declined or referred to other public institutions like the Court, Labour Commission, Department of Social Welfare and Ghana Police Service which were better placed to address the issues raised. Four thousand eight hundred and forty-two (4,842) complaints, representing 57.3% of concluded complaints were mediated successfully while the Commission investigated and made appropriate recommendation on the remaining 31.1%. See fig 7 below, the trend of complaint concluded over the past five years.

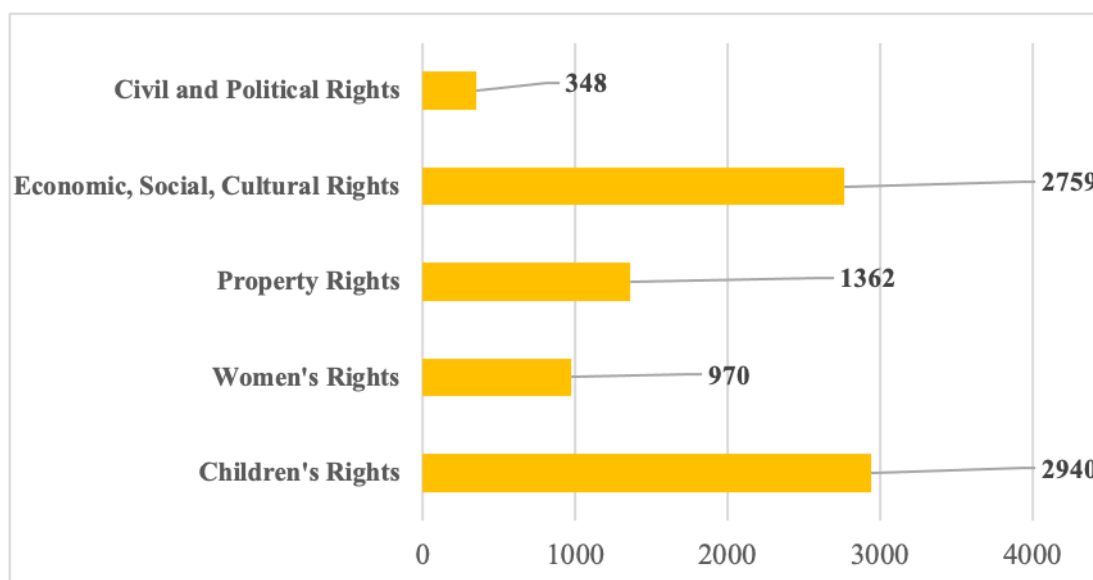
**Fig 7: Trend of Cases concluded: 2015-2019**



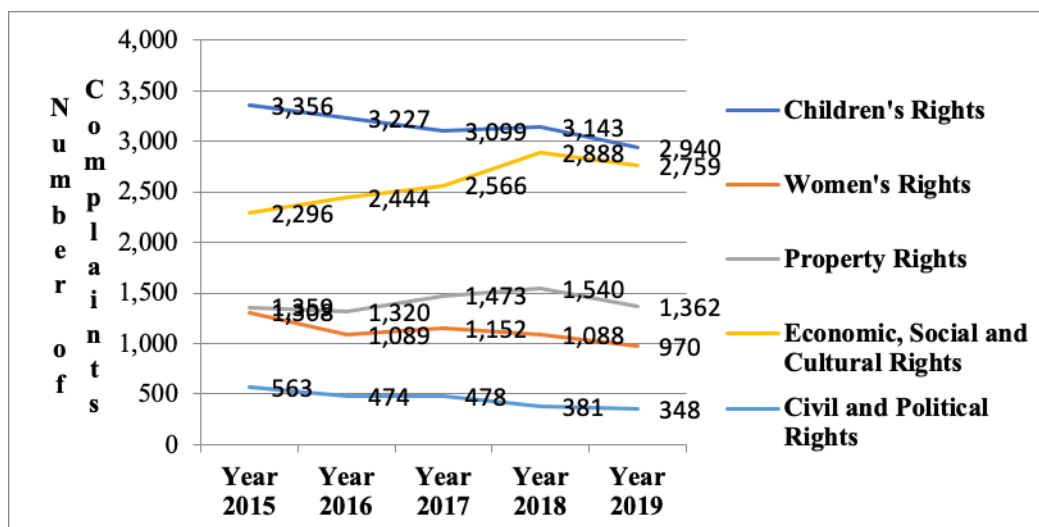
#### **Nature of Human Rights Complaints: 2019**

The 8,379 complaints received were categorized into Children's Rights, Women's Rights, Property Rights, Economic, Social and Cultural Rights and Civil and Political Rights. The respective number of complaints received under each category have been represented in the graph below.

**Fig 8: Types of Human Rights Complaints: 2019**



**Fig 9: Graphical Representation of Trend of Human Rights Complaints: 2015-2019**



- **Children's Rights Complaints:** This category of complaints decreased over the past three (3) years but increased marginally in 2018 and decreased again in 2019. It was the highest among the categories of complaints, accounting for about 35.1% of total Human Rights complaints received. Issues involving failure to send remittances for provision of necessities of life to the child in the areas of education, health, food, shelter, and clothing were predominant.
- **Women's Rights Complaints:** This category comprised issues of such as domestic violence, sexual harassment and right to spousal maintenance. This type of complaint has been fluctuating over the past years.
- **Property Rights Complaints:** These were predominantly on right to own property. This type of complaint accounted for about 16.3% of total human rights complaints.
- **Economic, Social and Cultural Rights Complaints:** The complaints were basically violations and abuses of labour rights in the private sector and right to housing, shelter and clean environment.
- **Civil and Political Rights Complaints:** Most of the complaints in this category involved right to personal liberty and dignity.

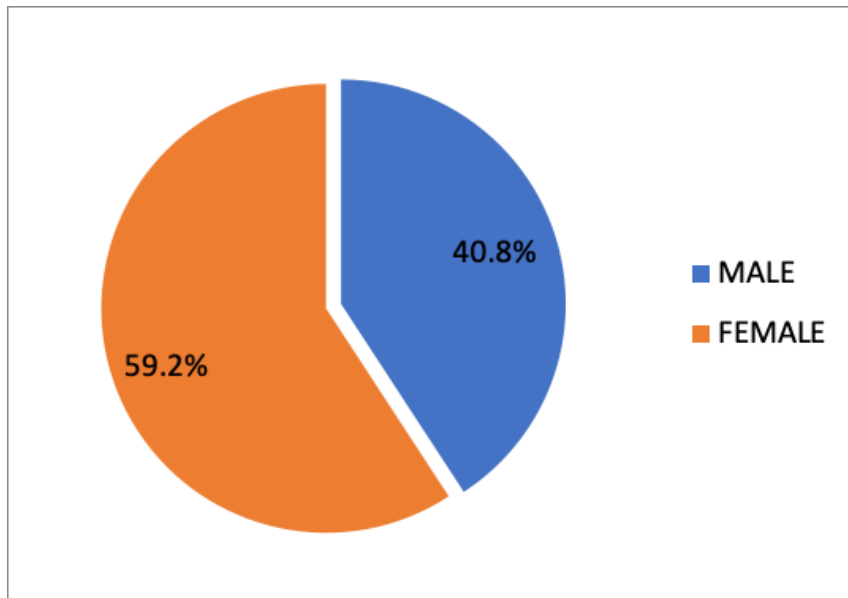
### Respondent Bodies

Seven thousand nine hundred and thirty (7,930) complaints, representing 94.6% of total Human Rights complaints were lodged against private individuals; while the remaining were mostly against private institutions.

### Sex Distribution of Complainants

Three thousand four hundred and twenty (3,420) complaints, representing 40.8% of total complaints were reported by males; whereas 4,959, constituting 59.2% were reported by females. See figure 10 below

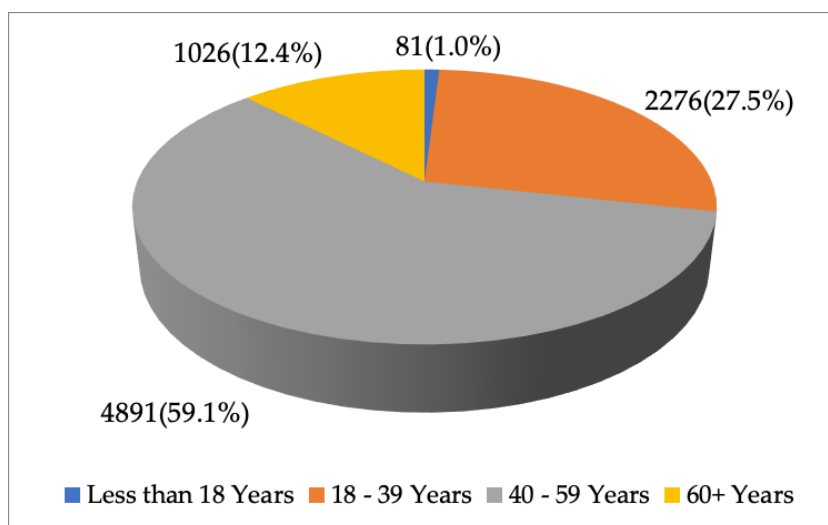
**Fig 10: Sex Distribution of Complainants**



### Age Distribution of Complainants

In all, ages of 8,274 complainants which represent 98.7% of total complainants were obtained. Number of complainants, their ages and corresponding percentages have been illustrated in the Fig 11 below.

**Fig 11: Age Distribution of Complainant**



## **Protecting fundamental rights of key populations (KPs)**

### **Online Stigma and discriminatory reporting system (SDRS)**

CHRAJ in partnership with Ghana AIDS Commission with funding support from USAID and Health Policy Project developed the SDRS in 2013 where key populations (KPs) can lodge complaints to designated staff in strict privacy and confidentiality. The system was designed to facilitate the reporting of cases on issues of stigma and discrimination and to better track such cases.

### **Rationale for establishing the SDRS**

Article 17(2) of the 1992 Constitution prohibits discrimination and states as follows “A person shall not be discriminated against on grounds of gender, race, colour, ethnic origin, religion, creed or social or economic status”. However, KPs in Ghana continue to face stigma and discrimination in varied forms which leads to violation of their fundamental human rights and particularly their right to access health services.

Section 7 (c) of CHRAJ Act, Act 456 mandates the Commission to investigate complaints concerning practices and actions by persons, private enterprises and other institutions where those complaints allege violations of fundamental rights and freedoms under the Constitution. Thus, CHRAJ is mandated by law to address human rights issues of all persons in Ghana, including KPs.

### **Collaboration with WAPCAS**

The Commission entered into a memorandum of understanding with the West African Project to Combat AIDs and STIs (WAPCAS) in January 2019 to support aspects of its work including revamping its Stigma and Discrimination Reporting System (SDRS) which has been out of use since 2017. The SDRS which was launched in 2013 to facilitate the reporting of cases on issues of stigma and discrimination against Persons Living with High HIV (PLHIV) and other Key populations (KPs) in Ghana has been out of operation for a while. The newly built system will provide three (3) main ways for Lesbians, Gays, Bisexual/Transgender, Intersex, Gender and Non-Conforming (LGB\TIGNC) Community and other key populations to lodge complaints at the Commission. These will include an online, SMS and digital map for easy location of CHRAJ offices across the country.

### **Combating Stigmatization and Discrimination**

The Commission in partnership with WAPCAS and other key stakeholders organised about twenty (20) public education programmes, ranging from radio shows, workshops and community dialogues on the rights of PLHIV and KPs; stigma and discrimination and the use of the stigma and discrimination reporting system. Beneficiaries of these sensitization programmes were the LGB\TIGNC community and the public at large. The programmes took place in the Northern, Upper East, Upper West, Central, Eastern and the Bono Regions of Ghana between February and December 2019.

## **National Human Rights Intervention Programme**

CHRAJ participated in the launch of the National Human Rights Intervention Programme in March 2019 by WAPCAS held in Accra, to educate KPs, PLHIV, and LGB/TIGNC community on accessing health facilities and seeking justice. The programme had about 250 participants, including peer educators, peer counsellors, community members, the Police, Traditional Leaders, and the media in attendance.

Since WAPCAS began collaborating with the Commission, there has been a marked improvement in the number of activities organized by CHRAJ in the form of community engagements as well as increased number of complaints received from the PLHIV and other key populations.

## **Observations**

One observation made from the findings in the assessment report worth mentioning is that, most of the KPs claim they do not trust the online reporting system created by CHRAJ.

Another observation made from the various implementation districts indicates that those who report various abuses do not avail themselves again to assist with investigations yet they expect the Commission to help settle the matter for them without them getting involved.

New Juaben office reported that since their engagement with the Police, relationship between the Police Service and the Community members has improved significantly compared to the previous years.

## **Complaint Received and Investigated: 2019**

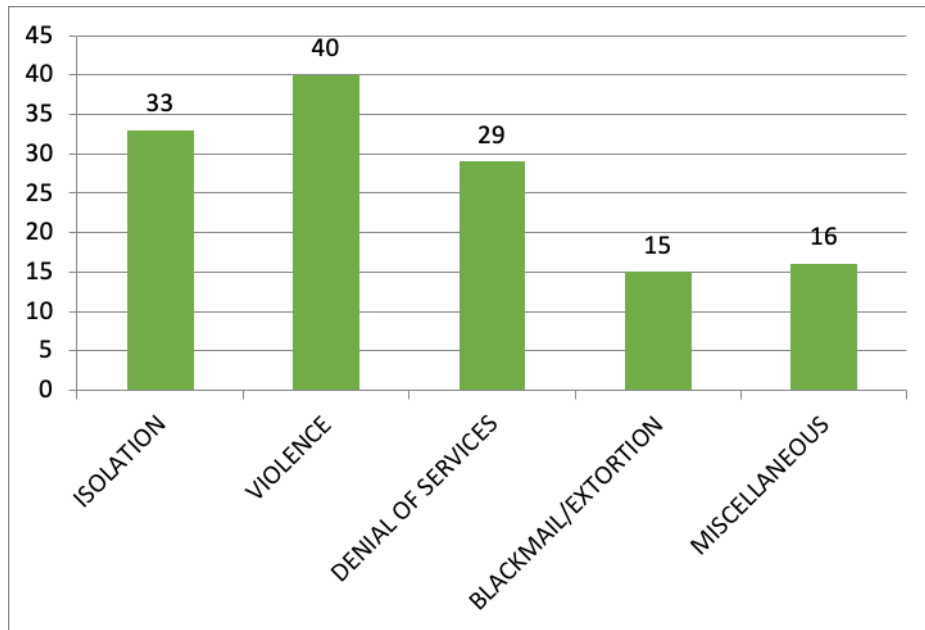
In the reporting year, the Commission received 39 complaints of discrimination and stigmatization from People living with HIV/AIDS (PLHIV), and key populations. Twenty (20) complaints representing 66.7% were successfully resolved. Seven (7) were referred to other governmental institutions which were better placed to deal with the issues raised while one (1) was discontinued. Eleven (11) cases were still pending investigation at the end of the reporting period.

## **Nature of Discrimination/Stigmatization**

- Isolation: Persons including family members disclosed the HIV/AIDS status of complainants. Consequently people would not want to associate themselves with them leading to isolation.
- Violence (sexual, physical, threat & harassment): Complainants suffer various forms of violence including sexual, physical, harassment, threat and emotional.
- Denial of Services or Opportunities: Complainants were refused certain services or opportunities including jobs/employment, health, education, security & Justice. Some organisations dismissed complainants upon hearing their HIV/AIDS status.

- Blackmail and Extortion: Complainants were blackmailed and money extorted from them.
  - Miscellaneous: These include 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 12: Nature of Discrimination/Stigmatization**





## Summary of cases

CASE No: 4112/2004

On the 29th day of December 2003, the Complainant lodged a complaint with the Commission in which she alleged victimization in the manner she was forced to resign from the La Community Bank Limited. Her forced resignation according to her was as a result of a customer's account which was debited only for it to turn out that the withdrawer was an impersonator.

After initial discussions with the Complainant, she was requested to submit a supplementary complaint clarifying some of the issues she had raised. The Complainant submitted a supplementary complaint dated 1st April 2004.

The Complainant's position is that before her appointment was terminated, she was a "B" signing officer with the Respondent; and that her appointment was terminated as a result of the loss of an amount of Eight Hundred Ghana cedis (GH¢800) which was attributed to the joint negligence of the Complainant and one Mr. Dramani.

The Complainant stated that one Abban called at the Respondent's Bank with an authority note allegedly signed by a named customer of the Bank, a savings account holder. According to the Complainant, as a savings account holder, the customer had to personally come to the Bank to be given a form to fill before the money could be given out to him. If for any reason the customer could not come, officials from the Bank were sent to the customer to obtain the necessary signatures before the money could be given out. But for compelling reasons, the customer could send a third party.

It is further the case of the Complainant that the GH¢800 was above her signing limit and that of Mr Dramani for which reason the approval was referred to the Accountant who had the requisite authority to approve the payment. It is only after the Accountant had viewed the transaction on the screen and satisfied himself of the authenticity of the request that he could then authorize payment. It is the view of the Complainant that the Accountant or Mr. Dramani should have rather been held liable.

The Complainant's case is further that the Internal Auditor of the Bank was tasked to investigate the matter after she and Mr Dramani were made to offer explanation on it. It was after the Internal Auditor submitted his report that the Board of Directors of the Bank met and took a decision that the Complainant and Mr. Dramani must resign or be dismissed. That she had no option than to submit her resignation letter at pain of being dismissed with all the attendant consequences.

The Complainant asserts strongly that prior to the termination of her appointment she had enough contribution in her staff provident fund which could have been used to offset whatever losses that the Bank may have incurred as a result of the incident. Rather she was forced to resign from the Bank. In her view, the Bank's decision must have been influenced

---

<sup>2</sup>The original figure was Eight Million cedis (¢8,000,000.00) before the cedi redenomination exercise in 2007

by one Mr Totimeh who was a Senior Manager supervising her work and who had proposed love to her and she had refused. The Complainant therefore alleges wrongful dismissal, discrimination and victimization.

The Respondent on its part mounted a serious defence to the action. Its case is that once the amount being requested is above the signing limit of the Complainant and Mr. Dramani, they ought to have been a bit more cautious or careful and ought to have ensured that the person seeking to withdraw the money was the rightful person. According to the Respondent, the only important information on the Accountant's Computer screen is the amount involved as to whether the customer has sufficient funds for which the request could be honoured. That, other information as to the type of request, that is either a note or a cheque and its presentation as to whether it is presented by the customer himself/herself or through a third party are unknown to the Accountant. The Accountant therefore did nothing wrong and the decision to dismiss the Complainant and Mr. Dramani in their view was fair.

### **Mandate of the commission**

The Commission on Human Rights and Administrative Justice was established by an Act of Parliament, Act 459 of 1993, pursuant to Article 218 of the 1992 Republican Constitution of Ghana.

One of the key mandates of the Commission is to investigate acts or allegations of violation of fundamental human rights whether in the Public Service or in a Private Institution. The present complaint triggers the human rights mandate of the Commission since it alleges discrimination, victimization and sexual harassment. Article 17 (1) (2) and (3) of the 1992 Constitution of Ghana states as follows:

- (1) All persons shall be equal before the law,
- (2) A person shall not be discriminated against on grounds of gender, race, colour, ethnic, origin, religion, creed or social or economic status.
- (3) For the purpose of this article, "discriminate" means different treatment to different persons attributable only or mainly to their respective descriptions by race, place of origin, political opinions, colour, gender, occupation, religion or creed, whereby persons of one description are subjected to disabilities or restrictions to which persons of another description are not made subject or are granted privileges or advantages which are not granted to persons of smaller description.

The said Article specifically frowns on discrimination which the Complainant alleges among others.

Besides the 1992 Constitution of Ghana there are several International Human Rights Principles and best practices that frown on discrimination, victimization and sexual harassment at the work place and Ghana being a signatory to these International Instruments is bound to abide by them.

## **Issues for determination**

Four main issues arise for determination in this complaint. They are;

1. Whether or not the Complainant was victimized resulting in her dismissal from the Bank
2. Whether or not the Complainant was discriminated against
3. Whether or not a Senior Manager of the Bank attempted to sexually harass the Complainant and how her refusal could have resulted in her dismissal from the Bank
4. Whether or not the dismissal of the Complainant from the Bank was lawful

## **Findings**

After a careful analysis of the evidence before the Commission the following findings were made:

- That the Complainant was employed by the Respondent and she worked for several years without blemish before this incident happened.
- That the amount involved in the transaction was way above the Complainant's signing limit of Two Hundred Ghana cedis (GH¢200.00).
- That the Complainant dutifully referred the matter (the transaction) to the Accountant who was a member of Management for approval.
- That it is the Accountant who actually gave the approval or authorization for the payment yet nothing was done to the Accountant but rather the Complainant was forced to resign which constituted discrimination and therefore constructive dismissal.
- That the transaction in this case was a normal occurrence at the Bank for many years.
- That the Complainant had sufficient funds in her provident fund which could have been used to offset whatever loss the Bank incurred.
- That the acts of the Bank constitute victimization and hence unlawful constructive dismissal.
- That the action by the Respondent Bank contravenes the human rights provisions in the 1992 Constitution of Ghana and international human rights instruments and best practices.

## **DECISION**

In the light of the above findings, the Commission recommends that the Complainant be compensated by the Respondent with two (2) years' salary of the current salary of a "B" signing official of the Respondent Bank.

The said money should be calculated and paid to the Complainant within two (2) months from the date of receipt of this decision.

#### **CASE NO: 138/2018/254**

On 30th May, 2018, the Complainant, a 57 year old man alleged that he reported a case at the Dansoman Police Station over a year ago but the case officer assigned to investigate the matter failed to do so because of his low social standing. He stated that the case officer had recently been transferred from the station and that nothing had been done about his case.

He wanted the Commission to direct the Respondent to take action on the case. Specifically, the Complainant wanted the Commission to impress upon the Respondent to re-assign his case to another case officer for investigations.

Upon receipt of the complaint, the Commission invited the Complainant to provide further and better particulars about his complaint. Upon receipt of the additional information, the Commission in a letter dated 17th October, 2018, requested the Respondent to re-assign the Complainant's case to another officer to investigate with dispatch.

The Complainant subsequently informed the Commission that his case was receiving attention from the Respondent.

In view of the fact that the Complainant had been granted the relief sought, the Commission closed the case in accordance with Section 13(1) (b) of ACT 456, which states that: ***"having regard to all the circumstances of the case, any further investigation is unnecessary, it may refuse to investigate the matter further."***

#### **CASE NO: 56/2019**

On 14th February, 2018, the Complainant filed a complaint with the Commission alleging that her 14 year old brother, who was supposed to be in school at the time of making the complaint, had been detained by the Teshie Divisional Police Command, the Respondent, for an alleged theft case. She claimed that when she went to the Police Station to make enquiries, she was informed by the Police that a military officer brought the boy to them for an alleged theft of a shopkeeper's money. She was further informed that they were interrogating him to find out the truth but her brother was not cooperating hence his detention. The Complainant further alleged that she went with an elder brother who tried to question the actions of the Police; and that the enquiries of her brother incurred the anger of the Police and they also arrested him and assaulted him.

The Complainant petitioned the Commission to, as a matter of urgency, procure a release of her brothers.

The Commission invited the Police for their reaction. The Police as a result of the Commission's intervention immediately released the brothers of the Complainant.

The case was resolved and file closed.

## **CASE NO: GA/2017**

The Complainant is an electrical engineering student of the Respondent's institution. In his complaint submitted to the Commission on 19th September, 2018 he alleged that, he received a rustication letter from the Respondent. This was after he had paid for his fees, registered for the term and had written all his mid-semester examination papers.

He further alleged that, the Respondent failed to invite him to the disciplinary Committee to state his side of the case as alleged by the rustication letter. Furthermore, his name was not part of the list of students who were invited by the disciplinary committee, as was indicated on the notice board. He noted that all his efforts to get the Respondent to reconsider its decision failed.

The complainant called on the Commission to compel the Respondent to investigate the case and to rescind its decision to rusticate him.

The Commission invited the complainant for further interviews and requested for further and better particulars. The Commission followed up with the Respondent and gave it the opportunity to react to the allegations. On 15th November 2018, the Respondent wrote to the Commission acknowledging its procedural irregularities and had therefore quashed its decision to rusticate the Complainant. The Respondent requested the Complainant to prepare and undertake all its examination accordingly.

On the 4th of December 2018, the Complainant presented a letter of appreciation to the Commission. In the letter, he expressed his gratitude and requested the Commission to close the case.

## **2.2. Administrative Justice Mandate**

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

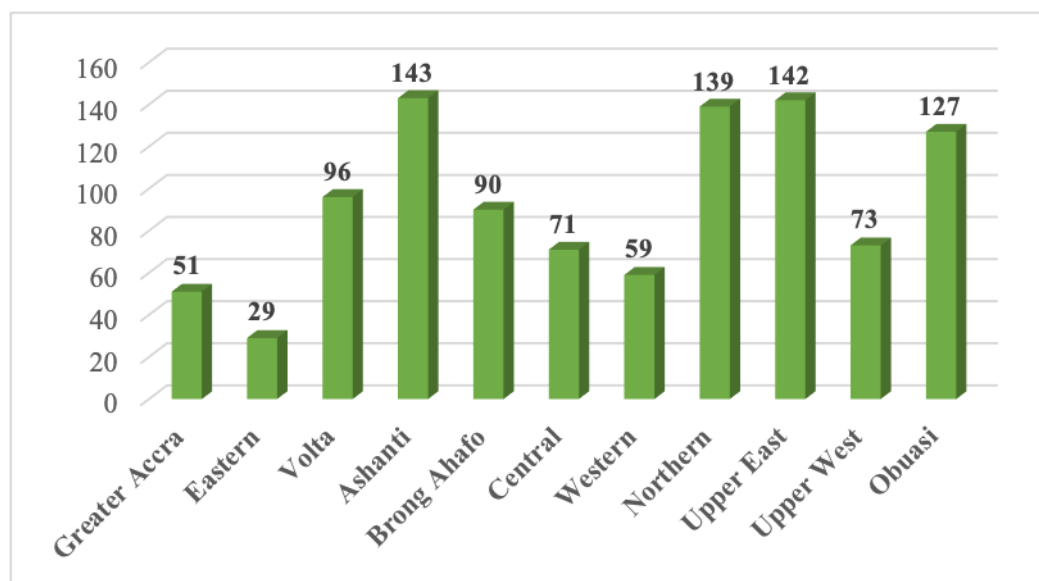
The Commission ensured improved standards and adherence to practices of good conduct in administering public services by:

- 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, practices and good conducts in public service delivery, a total of 1,020 educational activities were conducted across the nation. It shows 3.8% decrease with respect to the previous year's figure. Specific topics treated under the various programmes include; good administrative principles and conducts and maladministration. Basically, staff of public sector institutions whose missions and commissions affect the quality of public service delivery benefitted from these educational activities. See figure 13 for the regional distribution of the educational programmes.

**Fig 13: Regional Distribution of Public Educational Activities**



## Public Sector Reform for Results Project (PSRRP)

The Administrative Justice mandate of the Commission is one of the public sector institutions benefitting from the government of Ghana PSRRP Project. The overall objective of the PSRRP is to improve efficiency and accountability in the delivery of selected services by Selected Entities (SEs). The SEs refers to sixteen (16) MDAs participating in the project, including the Commission. The others are Driver and Vehicle Licensing Authority (DVLA); Passport Office; Ghana Immigration Service; Environmental Protection Agency; Births and Deaths Registry; Ministry of Transport; Ministry of Foreign Affairs and Regional Integration; Ministry of Interior; Ministry of Environment, Science and Technology and Innovation; Ministry of Local Government and Rural Development; Ministry of Monitoring and Evaluation, Office of the Head of Civil Service, Public Services Commission; National Information Technology Agency (NITA), and the Office of the Senior Minister.

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

In the reporting year, the Commission undertook the following activities under the PSRRP Project:

- Preparation and submission of the following documents to the PMU and the World Bank:

i. The 2019 and 2020 Annual work plans.

ii. Terms of reference to engage a Consultant to review CHRAJ existing grievance redress and complaint handling policies, procedures and actual practices, including the complaint handling manual and other administrative policies; and

iii. A procurement plan.

- Holding a meeting with the World Bank Team and PMU members on 3rd September 2019 to discuss the scope of work of CHRAJ and how to speed up the implementation process. The World Bank Team and PSRRP PMU members visited CHRAJ Tamale Regional Office a week after and to further understand the scope and operations of the Commission.

- The CHRAJ PIT participated in a 1 day PMU/PSRRP introductory meeting held on 10th January 2019 in Accra; a 2-day PSRRP/World Bank-PMU Training Workshop at Koforidua in September, 2019; and the PSRRP-PIT Coordinators meeting on November 18, 2019 in Accra.

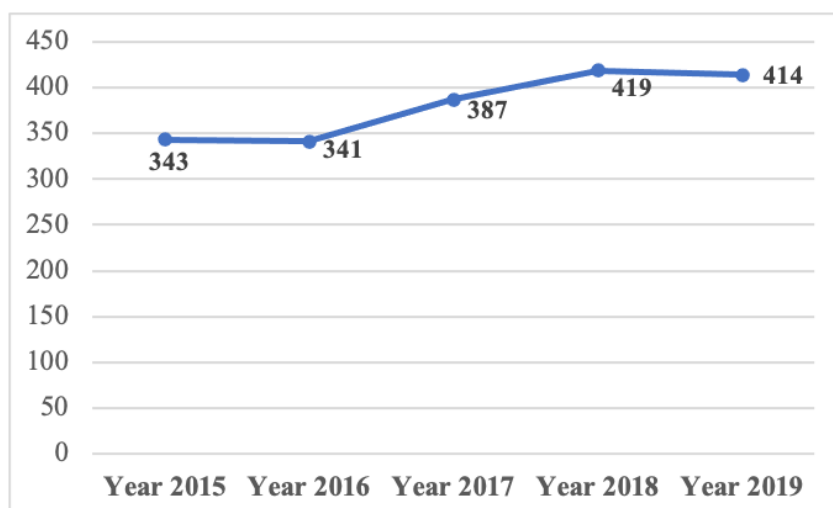
- Development of Web and Mobile Application Complaint Handling System. To develop web and mobile applications based complaints handling systems and improve the ability of users to access CHRAJ services, the Project Implementation Team (PIT) held meetings with I.T. Specialists from NITA to assist in the development of terms of reference for the Commission in furtherance of this objective.

### **Receipt of Complaints**

The Commission received and classified four hundred and fourteen (414) complaints under Administrative Justice mandate. This figure showed a decrease of 1.2% as compared to the previous year's complaints of four hundred and nineteen (419). See fig 14 below for the trend.



**Fig 14: Trend of Administrative Justice Complaints: 2015-2019**

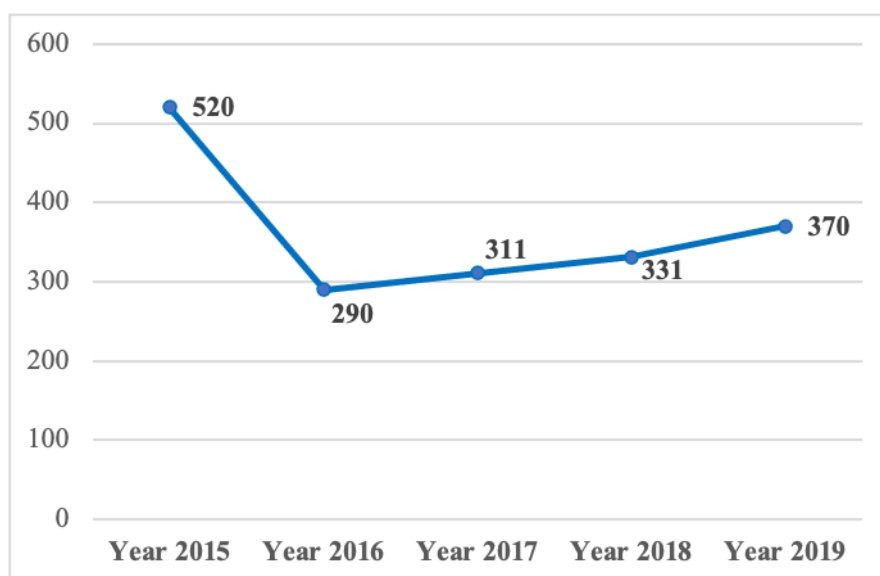


### **Complaints Concluded: 2019**

Three hundred and seventy (370) complaints were concluded which was higher than the previous year's figure of three hundred and thirty-one (331) by 11.8%. Out of the total complaints concluded, one hundred and six (106) representing, 28.6% were mediated whereas, fifty-five (55) (14.9%) were decided after preliminary and full investigations.

Also, one hundred and thirty-two (132) complaints representing 35.7% were discontinued and seventy-seven (77) (20.8%) complaints were either referred or declined for lack of mandate.

**Fig 15: Trend of Complaints Concluded: 2015-2019**





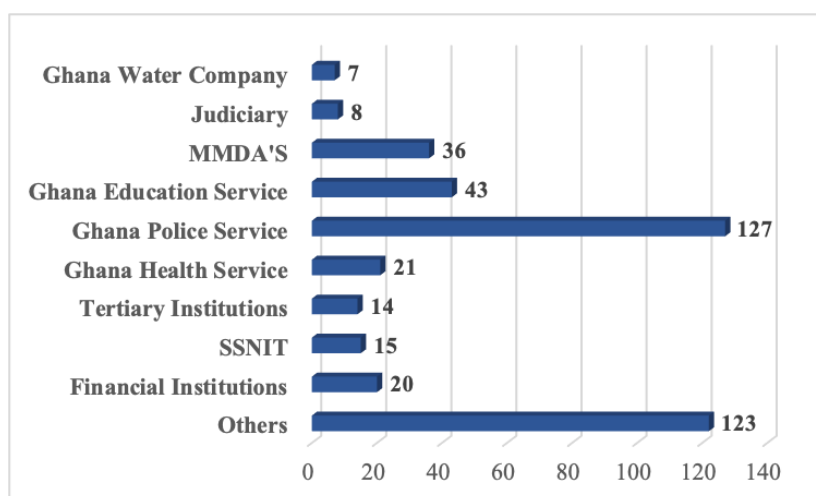
## Nature of Administrative Justice Complaints

Categories of complaints received were mainly on:

- Unfair treatment of individuals by public officers in the exercise of their official duty,
- Payment of entitlements and claims,
- Abuse of power, and
- Poor handling of complaints and service delivery.

Refer to appendix D for more details on the number of cases received under the respective categories.

**Fig 14: Trend of Administrative Justice Complaints: 2015-2019**



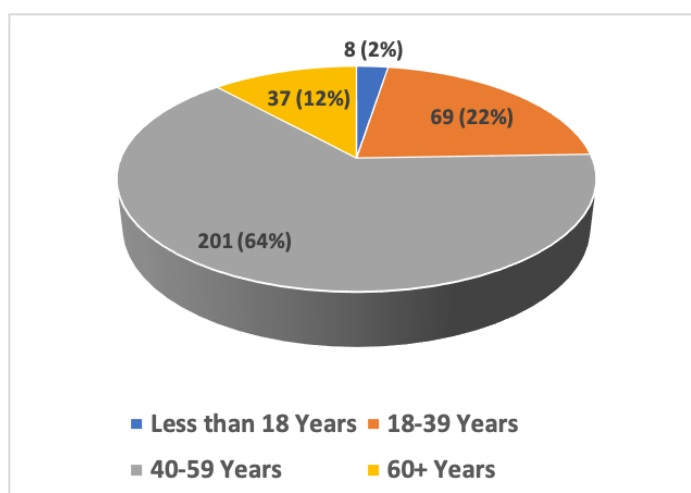
## Sex Distribution of Complainants

Three hundred and thirty three (333) complaints received which represents 80.4% were reported by males whilst eighty-one (81) (19.6%) were reported by females.

## Age Distribution of Complainants

In all, ages of 315 complainants which represent 85% of total complainants were obtained. Number of complainants, their ages and corresponding percentages are illustrated in the diagram below.

**Fig 17: Age Distribution of Complainants**



## **Summary of cases**

**CASE NO: 2009/HQ/01492**

### **Introduction**

The Complainant, who was an Accountant with the Ghana Armed Forces (the Respondent), lodged a complaint with the Commission alleging that the Respondent unlawfully terminated his appointment. The Respondent however, denied and alleged that the Complainant vacated his post leading to the termination of his appointment.

### **Complainant's position**

The Complainant stated that he was employed by the Respondent as a Civilian Accountant of the Ghana Armed Forces and worked over 30 years before his appointment was unlawfully terminated. He stated that he was posted to the Booking Unit of the Pay Office of the Respondents on 16th March, 2004 and worked there for four (4) years before applying for an internal transfer in May, 2008 to another section of the Pay Office of the Respondent. According to him, he made all efforts to get the Respondent to transfer him to another office but that proved futile. The situation allegedly affected him and his work performance hence his decision to appeal to the Civilian Administrator to change job schedule for him but this was also not successful. According to him, he was at post when the Respondent served him with a termination letter. The Complainant petitioned the Commission for reinstatement.

### **Respondent's position**

The Respondent in its response to the complaint averred that the Complainant requested for an internal posting from the Booking Section of the Pay Office of the Respondent institution where he worked for four (4) years before he was allegedly suspended from work and subsequently his appointment was terminated for absenting himself without permission.

According to the Respondent, the Complainant's request for internal transfer was going to be considered during the next routine reshuffling of employees. The Respondent however did not inform the Complainant about this development or decision hence the Respondent alleged this decision did not go down well with the Complainant that his internal transfer was under consideration hence he began to lose interest in his official work schedule. The Respondent alleged that the Complainant allegedly adopted a lackadaisical attitude towards official work assigned to him.

The Respondent contended that the Complainant was booked for Commanding Officer's interviews on two occasions. However, he failed to turn up on both occasions for the interview.

The Respondent concluded that the Complainant was advised on several occasions to change his attitude towards his official work but that did not yield any fruitful results. Finally, he absented himself from work continuously for eight (8) weeks without permission and he was subsequently dismissed for the vacation of post.

### **Complainant's reactions to respondent's position**

The Complainant reacted to the Respondent's response stating that nobody communicated to him that his request for an internal transfer was under consideration. He also denied failing to discharge his official duties at the Booking Section. He further stated that he was at post when termination letter was given to him on the 14th day of April, 2009. He also denied vacating his post and had been at work and signing the attendance notebook.

According to the Complainant, the Civilian Administrator did not follow the laid down procedure in terminating his appointment hence his termination was unlawful.

### **The mandate of the Commission**

In accepting to investigate the complaint, the Commission considered the status of the Respondents in order to trigger or invoke its Human Rights, Administrative Justice or Anti-Corruption mandate. The Complainant alleged that the Respondent abused its power by unlawfully terminating his appointment without any just cause. Article 210(1) of the 1992 Constitution provides that;

***“there shall be the Armed Forces of Ghana which shall consist of the Army, the Navy and the Air Force and such other services for which provision is made by Parliament”.***

Hence, the Respondent is a Public Institution set up by the 1992 Constitution of Ghana.

Article 218(1) (a) of 1992 Constitution mandates the Commission to ***“investigate abuse of power and unfair treatment of any person by a Public Officer in the exercise of his or her duties.”***

Section 7(1) (a) (b) of the Commission on Human Rights and Administrative Justice Act 1993, (Act 456) also provides that;

***(a) “The function of the Commission is to investigate complaints of violations of fundamental rights and freedoms, injustices abuse of power and unfair treatment of any person by a public officer in the exercise of his official duties.”***

***(b) to investigate complaints concerning the functioning of the Public Service 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 Prisons Service in so far as the complaint relates 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 23 of the 1992 Constitution, also provides that:

***“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 decision shall have the right to seek redress before a Court or other tribunal”***

The Complainant alleged his appointment was wrongfully terminated on the ground of vacation of post. The Commission is of the view that the actions of the respondent falls within its Administrative Justice and Human Rights mandates.

### **Issues for determination**

Upon a thorough review of the complaint as well as the response from the Respondent and taking into consideration the relevant documents obtained during investigation, the following issues arose for determination of the matter.

- (i) Whether or not the Complainant vacated his post
- (ii) Whether the Complainant is entitled to his claim

### **Findings**

1. The Commission finds that at all material time that the Respondent alleged that the Complainant vacated post, he was on his annual leave, which was duly granted to him by Respondent.
2. The Complainant all along maintained that he was at post when the termination letter was given to him; the Commission finds that credible.
3. The Commission is satisfied with the Complainant's assertion that he had been signing the Attendance Book until he was dismissed since the said book is under the custody of Respondent and even the subpoena could not make Respondent tender it to justify their action
4. The Complainant observed that there is a big Note Book, which served as Attendance Book, which the Complainant and other staff signed daily. Again, the subpoena to produce the said Attendance Book proved futile.
5. The Respondent was not able to produce the Attendance Book on the Complainant to ascertain whether the Complainant was absent for continuously eight (8) weeks. The Commission is of the considered view that the Respondent could not justify its action of termination relying on the Attendance Book.
6. The Commission finds that the Respondent has abused its power in terminating the Complainant's employment without just cause demanded by Article 191 of the Constitution which is binding on Respondent.
7. In the circumstances, the Commission finds that the Complainant was unlawfully removed from his employment.

## **Decision/recommendations**

The Commission concludes on the basis of available evidence or lack thereof that the termination of the Complainant's appointment was unlawful. However, the Commission notes the conduct of the Complainant towards his officially assigned work was unsatisfactory, hence it is not practicable to allow him back to work, rather the Commission recommends that he should be retired with all his benefits and other emoluments due him paid by Respondent from the date of his unlawful termination of appointment.

## **CASE NO: 120/2015/183**

### **Introduction**

On 29th June 2015, the Commission received a complaint from Eric Ofori Owusu (Complainant) against the Ghana Immigration Service (Respondent). The Complainant alleges that he has been "denied and ignored as colleagues experience upward mobility in rank" in the Respondent institution.

### **Complainant's case**

The Complainant stated that he was enlisted into the Ghana Immigration Service (GIS) in March 1998, and as at the time of lodging his complaint with the Commission he was on the rank of Inspector. According to the Complainant, he was informed at the time of enlistment in 1998 that applicants/recruits holding General Certificate of Education Ordinary (GCE "O") level certificate would be placed on the rank of Immigration Control Officer (ICO) while General Certificate of Education (GCE "A") level certificate holders would be placed on the rank of Assistant Inspector. Based on this, he submitted GCE "A" level certificate as his highest educational qualification, and expected to be placed on the rank of Assistant Inspector instead of being placed on the rank of Assistant Immigration Control Officer Grade 11 (AICO Grade II). He contended that the AICO Grade II rank was commensurate with GCE Ordinary (GCE "O") level holders. He further contended that but for the anomalous placement on the rank of AICO Grade II in 1998, he would have attained the rank of Assistant Superintendent by 2010.

Furthermore, the Complainant alleged that in 2011 he was granted study leave to pursue a degree programme in University of Ghana, but unlike other officers who were similarly granted study leave and were promoted, he was denied promotion on the basis that per a circular/policy document that emanated from Respondent, officers on study leave were not eligible for promotion. According to him, neither was he notified nor did he come across the said circular/policy document on study leave. He argued that the above omission on the part of Respondent amounted to unfair treatment, victimization and discrimination perpetrated against him. Consequently, he sought redress from the Commission after efforts to seek redress from the Respondent yielded no result.

### **Respondent's case**

The Respondent, in its comments dated 21st January 2016, confirmed that the Complainant was enlisted into GIS on 1st March, 1998 as part of the Intake One Group. It stated that upon successfully completing the recruit training course, and having served his probation, he was upgraded to an Assistant Immigration Control Officer Grade I (AICO Grade 1) effective 10th December, 1998 contrary to Complainant's assertion that he was placed on the rank AICO Grade II at the time of his enlistment.

According to the Respondent, the selection of applicants/recruits was based on specific qualifications, needs and skills. Regarding the selection for the Intake One Group to which the Complainant belonged, the selection of applicants/recruits was based on GCE "O" level certificate or its equivalent, and were placed on either AICO Grades I or II Grades taking into account the quality of their GCE "O" level grades. The Respondent denied that the selection of Intake One Group applicants/recruits included consideration of GCE "A" level certificate holders. Hence, the Respondent denied the assertion by Complainant that he submitted GCE "A" level certificate as the educational qualification for his enlistment. As a result, Respondent denied informing Complainant that he would be placed on the rank of Assistant Inspector upon presentation of GCE "A" level certificate at the point of entry or enlistment. Nevertheless, Respondent argued that subsequently it gave the Intake One Group applicants/recruits the opportunity to present "any higher certificates" they had for consideration for promotion. Consequently, according to the Respondent, Complainant was promoted to various ranks as follows:

1st March, 2003	-	Assistant Inspector
1st May, 2008	-	Inspector
1st April, 2016	-	Senior Inspector

The Respondent admitted granting complainant study leave in 2011 to undergo a degree programme at the University of Ghana. Respondent argued that officers who were on study leave were not allowed to take promotional examinations in that upon completion of their studies and submission of certificates, they would be eligible for promotion to the highest junior rank of Senior Inspector. Concerning the study leave granted Complainant, Respondent stated that despite the lapse of time, the Complainant had failed to present any certificate to it evidencing completion of his degree programme so as to facilitate his promotion.

Based on the aforementioned, Respondent maintained that it acted fairly by placing Complainant on his proper rank, Respondent insisted that the Complainant had rather treated it unfairly by being insincere and untruthful rendering the complaint and the allegations frivolous and vexatious.

### **Mandate of the commission**

The complaint relates to alleged administrative injustice perpetrated by the Respondent through exercise of discretionary power, which allegedly had resulted in unfair treatment, victimization and discrimination against him. The Respondent is part of the Public Services of Ghana under Article 190(1) (a) of the 1992 Constitution (the Constitution).

The Commission is an independent constitutional body imbued with the mandate as the Ombudsman or Administrative Justice institution that exercises oversight/control over the Public Services in Ghana, and also checks public power that may engender administrative injustice by public or civil servants or officials. In this regard, the Commission's Ombudsman mandate is premised on the following legal and constitutional framework:

Section 7(1) (a) of the Commission on Human Rights and Administrative Justice Act of 1993 [Act 456] provides that:



“The functions of the Commission are –

*to investigate complaints of violations of fundamental 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”*

## **Issues**

The following issues arise for determination:

Whether or not the Complainant was placed on the wrong rank at the point of entry/enlistment into the Respondent institution?

Whether or not the Respondent acted unfairly by discriminating against the Complainant with regard to the latter's promotion?

## **Findings**

The Commission made the following findings after its investigations:

- Complainant was placed on the rank of ILCO Grade II at the time of enlistment. Respondent, in spite of holding GCE "A" level certificate at the time of enlistment, did not place Complainant on the rank of Assistant Inspector as was the case with other officers who were holding GCE "A" level certificates, and were enlisted in 1999, 2000 and 2006 respectively.
- The plank of the complaint is wrongful placement at the point of entry (enlistment) based on Complainant's assertion that his GCE "A" level certificate was disregarded rather than his failure to present a certificate for promotion on completion of his degree programme at the University of Ghana as canvassed by Respondent. In view of points 2 and 3 above, the Complainant was denied orderly progression by the Respondent, which affected his promotion.

## **Conclusions**

Based on the above findings, the Commission concludes as follows:

Respondent acted unfairly towards the Complainant by placing him wrongly on the rank of AICO Grade II at the point of entry/enlistment instead of Assistant Inspector. Respondent acted unfairly, inconsistently and without objectivity thereby frustrating the orderly progression and promotion of the Complainant. In view of the above, the Respondent's act constitutes discrimination against the Complainant.

## **Recommendations**

Based on the findings and conclusions, the Commission recommends as follows:

1. Respondent should take steps to correct the wrong placement of the Complainant at the time of his enlistment to reflect current rank due him. For the avoidance of doubt, but for the wrongful placement at the time of his enlistment, Complainant would have been qualified to be promoted to the ranks of Assistant Superintendent in 2010, Deputy Superintendent in 2014 and Superintendent in 2018 respectively.

2. While it may be just to require the Complainant to participate in previous promotion processes, the justice of this matter requires that consistent with his colleague officers of the 1998 Intake One Group as well as officers who were enlisted in 1999, 2000 and 2000 respectively with GCE "A" level certificates, Respondent should take steps in place Complainant on the rank of Superintendent, a rank he would have earned in 2018 if he had undergone timely, orderly promotion or be placed on the appropriate rank on which officers enlisted with GCE "A" level certificates in 1998, 1999, 2000 and 2006 respectively are currently placed.
3. Respondent should take steps to ensure that the Complainant is paid the commensurate salaries and benefits that accrued during the period of his denial of promotion to the date of this Decision.
4. Respondent should ensure compliance with the above recommendations within three (3) months of receipt of this Decision.

### **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.

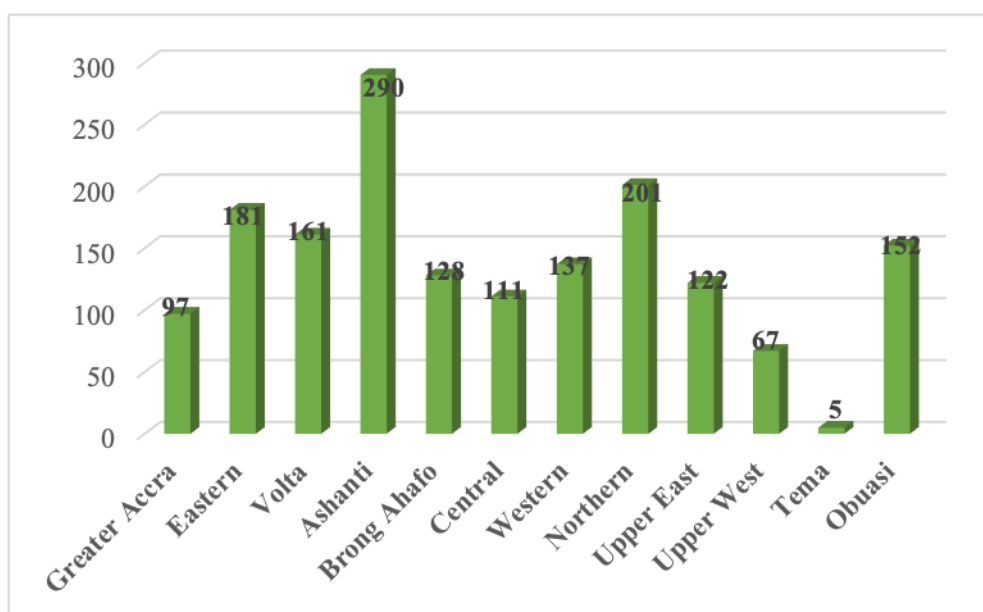
Highlights of achievements under this specific strategic goal in line with the above stated objectives are as follows:

#### **Public Sensitization on Anti-Corruption in the Regions and Districts**

Anti-corruption public sensitization in the regions and districts during the year under review recorded a total of 1,652. The activities covered issues relating to the Code of Conduct for Public Officers as stipulated in Chapter 24 of the 1992 Constitution and other corruption related offences. See regional distribution in the graph below.



**Fig 18: Regional Distribution of Public Educational Activities**



### **Capacity Building for Staff on Anti-Corruption Education**

As part of a range of targeted institutional support to CHRAJ under the European Union (EU) funded Accountability, Rule of Law and Anti-Corruption Programme (ARAP), a consultant was engaged to provide capacity building for staff who undertake PE in the Commission.

The first phase of the consultancy was capacity needs assessment of the Commission to examine its capacity to undertake public education, especially on its anti-corruption mandate. The assessment recommended that a set of capacity training workshops be carried out for staff involved in PE. The training modules were to develop beneficiaries' capacity to understand PE in anti-corruption and appropriate methodologies for outreach and effective communications skills. It also recommended the development of a set of tools and strategies to support the execution of identified PE activities.

Following from the above, the Commission organised five (5) capacity building workshops for its officers engaged in public education at all levels.

The trainings were structured in very participatory sessions and took the form of presentations/lectures, individual and group exercises, and discussions. Broad themes covered included:

- Goals, results and impact of PE activities on anti-corruption
- Designing PE activities on anti-corruption: Main elements and principles
- Mapping and building resources, networks, and tools for effective PE
- Skills for engagement via Radio, Television and Community Outreach

Overall, the training benefited 135 staff, comprising 11 officers from the head office, 10 Regional Directors, 2 Sub- Regional Directors, 13 PE Focal Persons and 99 District Directors.

Based on the pre- and post-training evaluation analysis, the training provided beneficiaries

with adequate understanding, skills and techniques for planning and undertaking effective public sensitisation on the mandates of Commission, essentially anti-corruption which was the focus.

### **Basic Investigation Techniques, Ethics, Integrity and Human Rights Training**

In line with CHRAJ role under NACAP, a number of trainings on Basic Investigation Techniques, Ethics, Integrity and Human Rights were organized for over 200 staff across the country. The trainings were aimed at increasing the capacity of the Commission to deliver on its mandates. Topics covered include:

- Review of the triple mandate of the Commission,
- planning and managing an investigation,
- Definition of Corruption: Scope, Effects and Control of Corruption,
- Code of Conduct for Public Officers and Conflict of Interest,
- Investigating Whistle-blower Disclosures,
- Investigating Complaints under Chapter 24 of the Constitution,
- Procedure and Practice,
- Overview of NACAP,
- Investigating Illicit/Unlawful Acquisition of Property, and
- Reporting on outcomes of an investigation.



***Officers/Participants at the Training***

## **Coordination of NACAP Activities**

### **Preparation of NACAP Work Plan 2020-2021**

In the reporting year, the Commission coordinated and participated in a Technical Committee meeting to develop a draft annual work plan (AWP) for 2019 and 2020, which was presented to the Monitoring and Evaluation Committee (MONICOM) of the NACAP. Thereafter, the Commission held a Joint meeting of the NACAP High Level Implementation Committee (HiLIC) and the MONICOM to consider and approve the AWP.

### **Preparation and Dissemination of 2018 NACAP Annual Progress Reports**

In 2019 the Commission constituted a Technical Working Group to prepare a draft Annual Progress Report (APR) on NACAP for the consideration of MONICOM. After MONICOM's consideration, the draft was validated and approved at a Joint Meeting of HiLIC and MONICOM, and copies subsequently printed for dissemination.

### **Capacity Building on NACAP National Anti-Corruption Reporting Dashboard [NACoRD]**

Subsequent to the official launch of the NACoRD, an online monitoring and reporting platform, in 2018; the Commission between January and March 2019 organized trainings for NACAP focal persons of the Metropolitan, Municipal, and District Assemblies (MMDAs), Ministries, Departments and Agencies (MDAs), Civil Society, and the private sector. The training benefited a total of 322 focal persons and augmented the capacity of these institutions in the use of the platform to report effectively on NACAP activities.

During the training, participants received unique usernames for logging unto the NACoRD for purposes of reporting. There were also practical exercises on how to use the platform for reporting.

### **Validation of NACAP Communication Strategy**

In November 2019, the Commission with the technical support of a consultant validated the NACAP communication strategy developed in 2018 at a Joint HiLIC/MONICOM meeting.

### **Anti-Corruption and Transparency (ACT) Week**

The Commission in partnership with stakeholders launched the 2019 ACT Week on 2nd December.

Following the launch, the Commission together with FIAPP and other partners, organized a one-day international programme on assets recovery, money laundering and international cooperation. Speakers from the United Nations Office on Drugs and Crime (UNODC), Canada, United Kingdom (UK), among others, attended and made presentations on the subject.



The week was climaxed on 9th December with a National Conference to commemorate the International Anti-Corruption Day. The Vice President of the Republic of Ghana, His Excellency Dr. Mahamudu Bawumia delivered the keynote address.



The Deputy Commissioner, Mr. Richard Quayson, who chaired the Organising Committee, presented a statement on the State of Corruption Report for the year.

There were also brief statements from selected National Institutions including the Judiciary and Parliament of Ghana, as well as the European Union (EU) Ambassador and the UK High Commissioner to Ghana.

Also, at a Round Table was organized to provide opportunity for the Public and Private sectors and CSOs to share experience on the implementation of NACAP in particular, and the fight against corruption in general, copies of the NACAP Annual Progress Report for 2018 were disseminated.



### **Baseline Survey on NACAP**

The Commission held several discussions with the UNODC on the subject in which the latter indicated its support for the survey. It also agreed to support a household survey on corruption, which would be the second since 2001. Discussions also took place between the Commission and the Ghana Statistical Service (GSS) in relation to the conduct of a household survey scheduled to commence after the population census.

### **Dialogue on Human Rights and Corruption on International Human Rights Day**

In commemoration of the International Human Rights Day on the 10th December, a dialogue was organized to highlight the interconnection between human rights and corruption. The programme, which was under the theme “Perspectives on Human Rights and Corruption”, was attended by many stakeholders including Mrs. Josephine Nkrumah, Chairperson of the National Commission for Civic Education, Ms. Silke Hollander, Acting Resident Representative of the UNDP, and Ms. Sylvia Ekra Lopez, UN Resident Coordinator.

### **Capacity Building for NACAP Implementing Institutions**

As part of efforts to enhance the capacity of IPs, the Commission during the period under review facilitated training workshops organised by the Drivers and Vehicle Licensing Authority, the Office of the Attorney-General and Ministry of Justice and the Ghana Refugee Board.

### **Collaboration with the Ghana Anti-Corruption Coalitions (GACC)**

At a programme organized by GACC in November 2019, CHRAJ made a presentation on the role of women in anti-corruption, how UNCAC and NACAP account for women in the fight against corruption and efforts to mainstream gender into past and ongoing anti-corruption strategies. Other panelists were from Centre for Democratic Development, and Ghana Institute of Management and Public Administration (GIMPA) Law Faculty.

## **INVESTIGATION/ENFORCEMENT OF CORRUPTION CASES**

### **Investigation of Corruption Cases**

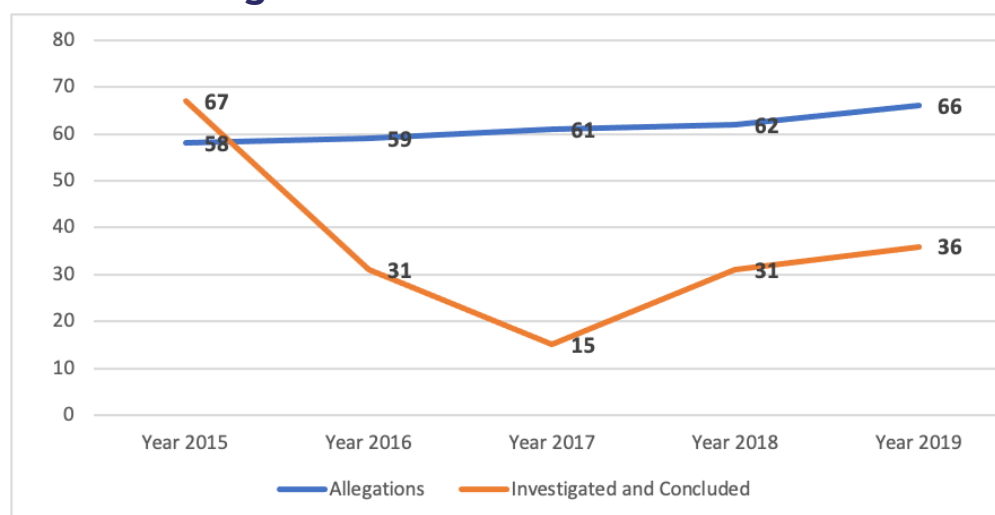
During the period, a total of 66 cases on corruption and breaches of the Code of Conduct for Public Officers under Chapter 24 of the 1992 Constitution were processed, out of which 9 were made under the Whistle-blowers Act, 2006 (Act 720).

Thirty-six (36) cases were concluded in the reporting year as against 31 in the previous year showing 16.1% increase.

### **Trend of Case**

The figures show a rising trend in cases of corruption over the period. The trend as illustrated in fig 19 below reveals a year-on-year steady increase of approximately 1.7% in 2016, 3.4% in 2017, 1.6% in 2018 and 6.5% in 2019.

**Fig 19: Trend of Cases 2015-2019**



### **Nature of Corruption Cases**

The nature of the cases was mainly Misappropriation, Embezzlement, Conflict of Interest, Bribery and Extortion. See Appendix E for more details.

### **Respondent Bodies in Cases of Corruption**

Complaints under this category were mostly lodged against public officials. Most of these officials work in MMDAs, Ghana Police Service and Ghana Education Service. See appendix H for more details.

## **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.

### **Staffing**

The year 2019 ended with staff strength of 696, representing an increase of twenty-nine (29) staff compared to the 2018 figure of 667. There was staff turnover of 30 officers compared to 24 in 2018. This is accounted for by 11 resignations, 15 retirements and 4 deaths.

### **Recruitment and Vacancies**

The Commission had 81 vacancies out of which 30 positions were filled. The recruited employees were made up of 19 males and 11 females. The dearth in the number of employees continued to be a challenge to meeting targets.

## **Staff Training and Development**

The Commission also gave its staff the opportunity to acquire knowledge and skills and development capacity to augment staff growth and improve service delivery. In line with this, 17 members of staff were granted permission to pursue higher education in various academic programmes with 2 on study leave with pay.

## **National Service/Interns**

The Commission attracted both local and international students to understudy CHRAJ for academic purposes. The Commission received 22 interns and 24 national service personnel totaling 46 persons.

## **General Administration**

The following were executed:

- On-going reconstruction of the burnt section of the old parliamentary chamber which started in 2018. Total completion of the building is estimated at 15%.
- Ongoing documentation and acquisition of Titles to CHRAJ lands acquired in the regions and districts.
- Replacement of existing network backbone at Head Office and Regional offices. Network infrastructure update was 85% complete.

---

<sup>3</sup>This includes National Human Rights Institutions(NHRIs), Ombudsman and Anti-Corruption Institutions

<sup>4</sup>Formerly known as International Coordinating Committee (ICC) established in 1993

## **PART 3: 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 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). 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.

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 NANHRI based in Nairobi (Kenya), the NNHRI-WA based in Accra (Ghana), and the Commonwealth Forum of National Human Rights Institutions.

The Commission continues to serve as Africa's Representative on the GANHRI Working Group on the United Nations Sustainable Development Goals (SDGs) and Chairman of NANHRI Working Group on SDGs and Africa Agenda 2063. Also, the Commission was elected as an Alternate member of the Sub-Committees of Accreditation of GANHRI and the OHCHR.

More importantly, the Commissioner of CHRAJ was elected as President of NNHRI-WA in 2019; and the Secretariat of the Network moved from Abuja, Nigeria to Accra, Ghana, and is being hosted by the Commission.

Study tour to CHRAJ by Gambia National Human Rights Commission (NHRC). In June 2019, the Commission hosted all the five (5) newly appointed Commissioners of the NHRC, who were in Ghana on a study tour of CHRAJ. The objectives of the study tour include increasing the NHRC knowledge and understanding of the setup, structures and



operations of the CHRAJ as a NHRI; the NHRC Commissioner's understanding of scope of their mandate as relating to the engagement with human rights mechanisms; establish networks and linkages between the NHRC and CHRAJ, staff and experts and promote learning and exchange of experience.

The Commission participated in a number of international cooperation activities under its Human Rights mandate including:

- The meeting of the NANHRI Working Group on Agenda 2030 for Sustainable Development and African Agenda 2063 in Nairobi, Kenya in January 2019. The meeting had two objectives, namely, to: reflect on the Working Group terms of reference and progress; and identify priorities and adopt a work plan for 2019. As part of the agenda, participants visited the Kenya Human Rights Commission (KHRC) for purposes of understudying how the KHRC mainstreamed implementation and monitoring of the SDGs into its work, especially with the assistance of technology. Following the study tour, the Commissioner of CHRAJ subsequently led a two-member technical team to the KHRC for a detail study of their operations, particularly in terms of leveraging technology for work design and implementation. The outcome of this technical tour was that the Commission decided to adopt the KHRC information management and reporting system using technology. Thus, in December 2019 a 2-member technical team (resource persons) from the KHRC came to understudy the Commission's workings/operations and reporting system and also made presentations on their system. The key objective was for staff of the Commission to buy into the KHRC system, and more importantly, enable them to relate to the system in terms of facilitating task accomplishment.
- The 2019 NNHRI-WA Annual General Assembly (AGM) meeting in Accra in May 2019. Resultantly, an official handing over ceremony was held in Abuja, Nigeria in October, 2019 to signify the formal transfer of leadership of the Secretariat from Nigerian to Ghana.
- The ECOWAS Human Rights Day & Extraordinary Meeting in Abuja, Nigeria in January, 2019.
- The Fifth Session of the African Regional Forum on Sustainable Development held at Marrakesh, Morocco in April, 2019. The Forum, which was under the theme: 'Empowering People and Ensuring Inclusiveness and Equality' with a focus on in-depth review of the SDGs 4,8,10,13 and 16 along with Goal 17, brought together, high-level policy makers and experts from government, inter-governmental organizations, private sector, CSOs and International development partners.
- The Re-Institution to a High-level Consultation meeting with NHRIs organised by NANHRI in partnership with UNAIDs and IDLO in Johannesburg, South Africa from in June, 2019. The meeting was aimed at promoting implementation of commitments made by Members, on the "Right to Health for All" and ending HIV/AIDS as a public health threat.

- The High-Level Political Forum (HLPF) on Sustainable Development in New York, USA in July 2019 under the theme, “Empowering People and Ensuring Inclusiveness and Equality”.
- The Ocean Africa Expert Meeting in Nairobi, Kenya in July/August 2019 under the theme, “The African Approach Meeting: Operationalizing a Human Rights Based-Approach to Sustainable Fisheries and Aquaculture Factors in the African Region”.
- The 3rd African Union Commission (AUC) – NANHRI Policy Forum on the State of African NHRIs in Addis-Ababa, Ethiopia in September 2019, under the theme, “NHRIs Contributions to Durable Solution on Forced Displacements in Africa.”
- A staff of the Commission attended a training course titled, “National Human Rights Initiatives on International Human Rights Mechanisms” jointly organised by the Friedrich Ebert Foundation, OHCHR, GANHRI and UNITAR in Geneva, Switzerland in May, 2019.
- An international workshop in Abidjan, La Cote d’Ivoire in September, 2019 on the theme “Security Challenges, the Fight against Terrorism and Implementation of Human Rights Protection in the ECOWAS Region”. The aim was to evaluate and share best practices for the fight against terrorism and respect for human rights.
- The End of Project Review meeting on the Discrimination of Petty Offences in Africa project. The meeting was organised by NANHRI with support from the Open Society Foundation- Human Rights Initiative (OSF-HRI) under the theme, “Enhancing the Role of NHRIs in the Discrimination of petty Offences in Africa”.
- SOGIE related complaints handling, investigations and documentation workshop in Entebbe, Uganda in July 2019. The objective of the meeting was to exchange strategies on how to increase reporting on SOGIE related violations in order to provide solutions that expand the protection space for sexual and gender minorities.

### **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.”

### **Ombudsman Expo**

In October 2019, Commission participated in the maiden International Ombud Expo programme under the theme “Extending the Ombud Frontiers: Better Governance, Enhanced Performance” in Abuja, Nigeria. The Commission participated in the 3-day exhibition sessions (side event) where it exhibited variety of documents including; flyers, training manuals, public education materials, research and annual reports.

### **International Conference on Administrative Justice in Judicial Review**

The Commission also participated in a conference on International Exchange Experiences on Administrative Justice in Judicial review in Madrid, Spain in November, 2019.

### **Visit by the Independent Electoral Commission of Uganda**

In June 2019, the Commission hosted members of the Electoral Commission of Uganda. This was a benchmarking visit by the Ugandan team to CHRAJ and other public institutions in Ghana including, the Electoral Commission, National Commission on Civic Education, and National Peace Council. The main objective was to share experiences and learn best practices in the areas of electoral administration, civic education, national peace building and conflict transformation.

### **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 Commission deepened its collaboration with regional and international anti-corruption institutions in the following areas:

#### **Peer Reviews**

The Commission participated in the review of Algeria and the finalization of the full report of the review of Indonesia during the period.

#### **Meetings of UNCAC related Bodies**

The Commission took part in Meetings of the UNCAC Related Bodies such as the Implementation Review Group, Inter-Governmental Working Groups on Prevention, Assets Recovery and Technical Assistance at Vienna. It was also part of the 8th Session of the Conference of States Parties to the UNCAC in Abu Dhabi, United Arab Emirates in December 2019.

The Ghana delegation hosted two special events at the session: “Human Rights, Gender and Corruption - Linkages, Good Practices, Potential and Limitations”, and “Exploring the Gender Dimensions of Corruption.” The special events were organized in collaboration with the

United Nations Office on Drugs and Crime (UNODC), and the OHCHR. A representative of the Commission served as a panelist on the special event on “Human Rights, Gender and Corruption - Linkages, Good Practices, Potential and Limitations” and another on “Exploring the Gender Dimensions of Corruption”. The occasion was used to launch a “Practitioner’s Guide on Corruption and Human Right.

### **Africa Anti-Corruption Conference**

The Commission was represented at the 1st African Anti-Corruption Forum and the 4th Annual General Assembly of the AAACA in June 2019 in Egypt. The Conference was under the theme, “Promoting and Preserving Africa's Development through a Concerted and Unanimous Fight against Corruption, a Key to a Radius Future of the African People”.

The General Assembly reminded members to, among others strengthen and operationalize the exchange of information and cooperation in the exercise of their missions to regularly pay their subscriptions as they fall due.

As part of the events, a Technical Team, composed of representatives from Egypt, Ghana, Tunisia, Kenya, Zimbabwe, Congo, and Madagascar was put in place to study, unpack and operationalize the full implementation of Resolutions adopted by the Forum.

At the end of the Annual General Assembly, the AAACA awarded the Status of Honorary Member to the Commission’s Director of Anti-corruption, Mr. Charles Ayamdoo, who was its President from 2013-2016.

### **Annual General Assembly of the Network of National Anti-corruption Institutions in West Africa (NACIWA)**

Selected officials of the Commission joined the NACIWA Annual General Assembly in November, 2019 in Lome, the Republic of Togo. The programme was under the theme "Towards Adoption of a Common African Position on Asset Recovery." It was hosted by the Higher Authority for the Prevention and Fight against Corruption and Related Offences under the auspices of His Excellency Faure Gnassingbé, President of the Republic of Togo.

## PART 4: FINANCIAL REPORT

The Commission was granted parliamentary approval to spend the sum of Thirty-One Million, Eight Hundred and Forty-Eight Thousand, Seventy Ghana Cedis, Fifty Pesewas (GH¢31,848,070.50) on Compensation, Goods and Services and Assets during the reporting year. Analysis of releases and approved budget however indicated a shortfall of Four Million, Forty-Three Thousand, Six Hundred and Twenty-Eight Ghana Cedis, Ninety-Four Pesewas (GH¢4,043,628.94). Nonetheless, releases for the year showed approximately 18% increase over that of 2018. See figure 20 below for details.

**Fig 20: Budget and Releases for 2019**

EXPENDITURE ITEM	2018 -GHS ACTUAL	2019 (GHS)		VARIANCE - GHS
		BUDGET	ACTUAL	
Compensation	18,121,642.33	24,000,000.50	22,212,985.22	1,787,015.28
Goods and Service	2,399,951.68	5,438,185.00	4,332,498.24	1,105,686.76
CAPEX/Assets	3,083,821.17	2,409,885.00	1,258,958.10	1,150,926.90
<b>TOTAL</b>	<b>23,605,415.18</b>	<b>31,848,070.50</b>	<b>27,804,441.56</b>	<b>4,043,628.94</b>

## PART 5: APPENDICES

### DETAILED STATISTICAL TABLES

#### Appendix A: Classification of complaints received and concluded according to offices

REGIONS	CASES RECEIVED IN 2019				TOTAL CASES CLOSED (INCLUDING CASES CARRIED FROM PREVIOUS YEARS)			
Upper East Region	HR	ADM	COR	TOTAL	HR	ADM	COR	TOT
BOLGATANGA	48	8	1	57	45	7	0	52
BONGO	30	2	1	33	31	1	0	32
NAVRONGO	54	0	0	54	55	0	0	55
BAWKU	47	3	1	51	46	3	1	50
SANDEMA	34	0	0	34	32	0	0	32
ZEBILLA	34	0	0	34	27	0	0	27
SUB-TOTAL	247	13	3	263	236	11	1	248
Upper West Region	HR	ADM	COR	TOTAL	HR	ADM	COR	TOT
WA REG. OFFICE	105	23	2	130	120	28	2	150
NADOWLI	44	0	0	44	42	0	0	42
JIRAPA	44	0	0	44	43	0	0	43
SISSALA	33	0	0	33	33	0	0	33
LAWRA	46	6	0	52	44	6	0	50
SUB-TOTAL	272	29	2	303	282	34	2	318
Ashanti Region	HR	ADM	COR	TOTAL	HR	ADM	COR	TOTAL
REG. OFFICE	132	50	7	189	80	18	0	98
MAMPONTENG	68	3	0	71	68	8	0	76
BEKWAI	71	1	0	72	78	2	0	80
MAMPONG	47	3	0	50	43	5	0	48
OFFINSO	386	1	0	387	379	1	0	380
EFFIDUASE	50	0	0	50	44	1	0	45
EJURA	68	1	0	69	59	1	0	60
NEW EBUBIASE	59	1	1	61	63	1	0	64
KONONGO	60	3	0	63	68	2	0	70
JUASO	63	1	0	64	65	1	1	67
TEPA	153	1	0	154	150	0	0	150
MANKRANSO	53	0	0	53	55	0	0	55
MANSO NKWANTA	92	5	2	99	89	5	4	98
NKAWIE	103	3	0	106	90	1	0	91
KUNTANASE	180	6	4	190	192	5	4	201

OBUASI	205	4	0	209	209	3	1	213
<b>SUB-TOTAL</b>	<b>1,790</b>	<b>83</b>	<b>14</b>	<b>1,887</b>	<b>1732</b>	<b>54</b>	<b>10</b>	<b>1,796</b>
<b>Brong Ahafo Region</b>	<b>HR</b>	<b>ADM</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADM</b>	<b>COR</b>	<b>TOTAL</b>
SUNYANI	308	20	5	333	307	13	4	324
BEREKUM	98	0	0	98	92	0	0	92
KINTAMPO	142	0	0	142	156	1	1	158
ATEBUBU	145	0	0	145	160	0	0	160
BECHEM	40	0	0	40	31	2	0	33
TECHIMAN	286	2	0	288	322	1	0	323
DROBO	55	0	0	55	58	0	0	58
NSAWKAW	16	0	0	16	12	0	0	12
GOASO	126	0	0	126	123	0	0	123
NKORANZA	92	0	0	92	131	0	0	131
KENYASI	164	0	0	164	160	0	0	160
KWAME DANSO	190	1	0	191	178	1	0	179
WENCHI	247	1	0	248	250	1	0	251
<b>SUB -TOTAL</b>	<b>1909</b>	<b>24</b>	<b>5</b>	<b>1938</b>	<b>1980</b>	<b>19</b>	<b>5</b>	<b>2004</b>
<b>Northern Region</b>	<b>HR</b>	<b>ADM</b>	<b>COR</b>	<b>TOTAL</b>	<b>HR</b>	<b>ADM</b>	<b>COR</b>	<b>TOTAL</b>
TAMALE	46	15	1	62	40	13	0	53
TOLON	1	2	3	6	1	1	2	4
YENDI	31	1	0	32	35	1	0	36
SABOBA	55	2	1	58	53	0	1	54
SALAGA	16	1	0	17	18	2	0	20
GUSHEJU	5	0	1	6	6	0	0	6
DAMANGO	17	0	0	17	20	0	1	21
GAMBAGA	16	2	0	18	17	0	0	17
SAVELUGU	7	1	0	8	9	1	0	10
BOLE	9	0	1	10	9	0	0	9
ZABZUGU	8	0	0	8	11	0	0	11
BIMBILLA	60	0	0	60	54	0	0	54
WALEWALE	19	1	0	20	24	1	1	26
<b>SUB- TOTAL</b>	<b>290</b>	<b>25</b>	<b>7</b>	<b>322</b>	<b>297</b>	<b>19</b>	<b>5</b>	<b>321</b>



Western Region	HR	ADM	COR	TOTAL	HR	ADM	COR	TOTAL
TARKWA	36	4	1	41	34	5	1	40
BIBIANI	165	1	0	166	167	1	0	168
ASANKRANGWA	70	3	0	73	66	3	1	70
ENCHI	102	1	0	103	96	1	0	97
HALF ASSINI	37	2	0	39	36	2	0	38
SEFWI WIAWSO	72	0	0	72	78	0	0	78
DABOASE	68	4	0	72	65	4	0	69
AXIM	39	0	0	39	39	0	0	39
JUABOSO	36	0	0	36	31	0	0	31
TAKORADI	72	14	0	86	69	15	0	84
SUB-TOTAL	697	29	1	727	681	31	2	714
Central Region	HR	ADM	COR	TOTAL	HR	ADM	COR	TOTAL
CAPE COAST	52	13	0	65	41	8	0	49
ABURA- DUNKWA	49	0	0	49	45	0	0	45
TWIFO PRASO	44	0	0	44	37	0	0	37
APAM	33	1	0	34	23	0	0	23
AGONA SWEDRU	132	2	0	134	145	4	0	149
ENYAN ESSIAM	26	0	0	26	26	0	0	26
DUNKWA	61	0	0	61	57	0	0	57
ELIMINA	42	0	0	42	48	2	0	50
BREMAN ASIKUMA	29	0	0	29	31	2	1	34
SALTPOND	53	0	0	53	52	0	0	52
ASSIN FOSU	37	3	0	40	33	4	0	37
AWUTU EFFUTU	104	2	0	106	102	2	0	104
SUB- TOTAL	662	21	0	683	640	22	1	663
Greater Accra	HR	ADM	COR	TOTAL	HR	ADM	COR	TOTAL
HEAD OFFICE	185	126	29	340	175	117	8	300
REG. OFFICE	11	4	0	15	16	6	0	22
TEMA	56	2	0	58	57	4	0	61
AMASAMAN	54	0	0	54	155	2	0	157
WEIJA	72	1	0	73	83	1	0	84



DODOWA	18	0	0	18	28	0	0	28
SOWUTUOM	13	0	0	13	3	0	0	3
ADA	44	4	0	48	48	1	0	49
SUB- TOTAL	453	137	29	619	565	131	8	704
VOLTA REGION								
AKATSI	230	10	1	241	238	6	2	246
KETA	179	0	2	181	190	0	0	190
HOHOE	106	2	0	108	103	1	0	104
ADIDOME	75	0	0	75	68	0	0	68
DENU	262	3	0	265	223	2	0	225
KADJEBI	62	0	0	62	74	0	0	74
JASIKAN	80	1	0	81	84	1	0	85
KRACHI	71	0	0	71	62	0	0	62
KPANDO	94	4	1	99	88	3	0	91
NKWANTA	70	0	0	70	67	0	0	67
HO	101	20	0	121	114	15	0	129
SOGAKOPE	159	1	0	160	151	1	0	152
SUB- TOTAL	1489	41	4	1534	1462	29	2	1493
Eastern Region	HR	ADM	COR	TOTAL	HR	ADM	COR	TOTAL
REG OFFICE	7	4	1	12	9	11	0	20
NKAWKAW	37	0	0	37	40	2	0	42
KADE	85	0	0	85	86	0	0	86
NEW ABIREM	66	0	0	66	67	0	0	67
BEGORO	37	0	0	37	35	0	0	35
KIBI	28	1	0	29	21	2	0	23
NSAWAM	49	0	0	49	49	0	0	49
ASAMANKESE	105	0	0	105	105	0	0	105
SUHUM	27	0	0	27	28	0	0	28
AKOSOMBO	13	0	0	13	13	0	0	13
AKIM ODA	28	2	0	30	31	1	0	32
ODUMASE KROBO	43	0	0	43	43	0	0	43
AKROPONG	35	1	0	36	33	1	0	34

DONKORKROM	13	1	0	14	13	0	0	13
SUB-TOTAL	573	9	1	583	573	17	0	590
GRAND TOTALS	8,379	414	66	8,859	8,445	370	36	8,851

## Appendix B: Classification of Regional Distribution of Complaints Received and Concluded: 2019

REGIONS	CASES RECEIVED IN 2019				CASES CONCLUDED (INCLUDING CASES CARRIED FROM PREVIOUS YEARS)			
	HR	AJ	C	TOT	HR	AJ	C	TOT
UPPER EAST	247	13	3	263	236	11	1	248
UPPER WEST	271	30	2	303	281	35	2	318
ASHANTI	1,790	83	14	1,887	1,732	54	10	1,796
BRONG AH	1,909	24	5	1,938	1,980	19	5	2,004
NORTHERN	290	25	7	322	297	19	5	321
WESTERN	697	29	1	727	681	31	2	714
CENTRAL	662	21	0	683	640	22	1	663
GREATER ACCRA	453	136	29	618	565	131	8	704
VOLTA	1487	43	4	1,534	1460	31	2	1,493
EASTERN	573	9	1	583	573	17	0	590
TOTALS	8379	414	66	8,859	8445	370	36	8,851

## Appendix C: Regional breakdowns of nature of human rights complaints received

NATURE OF ABUSES	U/ W	U/E	E/R	C/R	W/R	G/R	N/R	V/R	ASH	B. A	HDO	TOT
<b>CHILDREN'S RIGHTS</b>												
Right of Access to Natural Parents	8	29	12	22	15	14	10	33	88	29	4	264
Right to Health	1	2	0	2	1	0	0	5	3	5	0	19
Right to Education	1	12	8	11	8	4	27	47	8	25	0	151
Child labour	0	0	0	2	0	0	0	5	1	3	0	11
Right to Paternity	2	5	5	11	0	2	3	9	50	34	1	122
Right to Maintenance (necessaries of life)	56	72	214	212	166	94	52	353	363	320	26	1,928
Inhuman Treatment(maltreatment)	0	0	0	2	0	2	3	0	0	8	2	17
Child Trafficking	0	0	1	0	1	1	0	0	0	0	0	3
Child Custody	7	10	39	17	18	3	15	138	17	70	6	340
Early and Forced Marriage	0	8	0	1	1	0	16	3	0	3	0	32
Right to Name	0	0	0	31	0	0	0	1	3	2	0	37
Defilement	0	1	0	0	3	1	2	7	1	1	0	16
<b>SUB-TOTAL</b>	<b>75</b>	<b>139</b>	<b>279</b>	<b>311</b>	<b>213</b>	<b>121</b>	<b>128</b>	<b>601</b>	<b>534</b>	<b>500</b>	<b>39</b>	<b>2,940</b>
<b>WOMEN'S RIGHTS</b>												
<b>Violence Against Women</b>												
➤ Battery	0	15	1	9	26	2	2	9	10	23	1	98
➤ Psychological, &Emotional	8	6	1	9	33	4	6	7	48	127	4	253
Spousal rights to maintenance	4	2	45	14	21	6	3	35	42	144	2	318
Reproductive Health Rights	10	8	11	25	40	5	41	62	27	58	1	288
Sexual Harassment	1	0	1	0	0	1	1	1	1	2	1	9
Rape	0	1	0	0	0	0	0	2	0	1	0	4
<b>SUB-TOTAL</b>	<b>23</b>	<b>32</b>	<b>59</b>	<b>57</b>	<b>120</b>	<b>18</b>	<b>53</b>	<b>116</b>	<b>128</b>	<b>355</b>	<b>9</b>	<b>970</b>
<b>PROPERTY RIGHTS</b>												
Right to Own Property	37	15	54	93	165	12	12	124	157	130	5	804
Inheritance	0	0	6	4	26	4	0	17	110	51	0	218
Destruction	3	0	5	0	9	2	3	29	33	34	1	119
Trespass/Encroachment	4	0	2	3	4	1	0	18	21	35	6	94
Title	0	3	0	4	3	2	0	2	7	0	1	22

Intestate Succession (PNDCL111)	0	0	1	1	16	1	0	7	19	43	17	105
<b>SUB-TOTAL</b>	<b>44</b>	<b>18</b>	<b>68</b>	<b>105</b>	<b>223</b>	<b>22</b>	<b>15</b>	<b>197</b>	<b>347</b>	<b>293</b>	<b>30</b>	<b>1,362</b>
<b>ECONOMIC, SOCIAL AND CULTURAL RIGHTS</b>												
Freedom of Worship/Religion	1	1	0	1	0	0	0	2	0	0	1	6
Right to Work	0	1	0	0	0	1	0	11	0	0	0	13
<b>Harmful Cultural Practices</b>												
➤ Banishment	0	0	1	3	1	0	1	0	0	0	1	7
➤ Witchcraft Accusation/Molestation	2	0	0	0	0	0	4	2	0	1	0	9
Right to Health	2	1	3	5	4	2	2	6	6	9	0	40
Right to clean and Healthy Environment	1	0	1	2	1	0	0	8	9	0	1	23
Right to housing/shelter	0	1	1	2	0	1	0	11	1	0	0	17
Right to Marry and found a family	0	0	0	5	0	0	0	1	0	2	1	9
Forced Eviction	4	2	1	4	3	3	2	17	99	70	7	212
Breach of Agreement	13	0	76	68	46	9	14	285	156	305	18	990
Tenancy/Landlord related Abuses	3	3	23	19	18	12	1	27	207	155	0	468
Right to Life	3	0	0	1	1	1	0	22	3	0	2	33
Labour Rights	44	10	19	35	45	49	44	56	93	76	34	505
Discrimination	2	0	0	0	0	0	1	1	1	0	4	9
others	33	21	12	23	12	12	19	46	137	75	28	418
<b>SUB-TOTAL</b>	<b>108</b>	<b>40</b>	<b>137</b>	<b>168</b>	<b>131</b>	<b>90</b>	<b>88</b>	<b>495</b>	<b>712</b>	<b>693</b>	<b>97</b>	<b>2,759</b>
<b>CIVIL AND POLITICAL RIGHTS</b>												
Right to Personal Liberty (Harassment)	8	3	27	1	8	6	0	20	45	40	1	159
Right to Dignity (Inhuman Treatment)	14	15	3	19	2	9	5	59	23	28	5	182
Freedom of Association	0	0	0	0	0	1	1	0	0	0	1	3
Right to Privacy	0	0	0	1	0	1	0	1	1	0	0	4
<b>SUB-TOTAL</b>	<b>22</b>	<b>18</b>	<b>30</b>	<b>21</b>	<b>10</b>	<b>17</b>	<b>6</b>	<b>80</b>	<b>69</b>	<b>68</b>	<b>7</b>	<b>348</b>
<b>GRAND-TOTAL</b>	<b>271</b>	<b>247</b>	<b>573</b>	<b>662</b>	<b>697</b>	<b>268</b>	<b>290</b>	<b>1,487</b>	<b>1,790</b>	<b>1,909</b>	<b>185</b>	<b>8,379</b>

## Appendix D: Nature of Administrative Justice Complaints Received According to Regions and Head Office: 2019

NATURE OF COMPLAINTS	U/W	U/E	E/R	C/R	W/R	G/R	N/R	V/R	ASH	B.A	HO	TOTAL
<b>CESSATION OF EMPLOYMENT</b>												
Premature Retirement	0	0	0	0	0	0	0	0	2	0	0	2
Unlawful Termination of Appointment	1	0	0	0	1	0	0	3	1	1	10	17
Unlawful Dismissal	0	2	0	1	1	0	1	0	2	0	7	14
<b>SUB TOTAL</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>5</b>	<b>1</b>	<b>17</b>	<b>33</b>
<b>ENTITLEMENT</b>												
Failure to pay salary	2	4	2	1	2	4	4	5	10	7	6	47
Unauthorized deductions of salaries	1	0	0	1	0	0	2	0	2	1	2	9
Failure to Pay Pension Allowances	0	1	0	3	0	0	0	0	0	1	6	11
Failure to pay End of Service Entitlement	0	0	0	0	1	0	0	1	2	0	1	5
Failure to pay allowances	1	0	0	0	0	1	0	1	1	0	4	8
Failure to Pay Transfer Grants	0	0	0	0	0	0	0	0	0	0	1	1
Failure to Pay SSNIT contribution	0	0	0	0	1	2	0	2	8	1	0	14
Others	0	0	0	0	0	0	0	0	0	0	5	5
<b>SUB-TOTAL</b>	<b>4</b>	<b>5</b>	<b>2</b>	<b>5</b>	<b>4</b>	<b>7</b>	<b>6</b>	<b>9</b>	<b>23</b>	<b>10</b>	<b>25</b>	<b>100</b>
<b>PROPERTY</b>												
Arbitrary confiscation of property by Public Official	0	1	0	0	1	0	0	1	0	0	0	3
Destruction of property by public official	0	0	0	1	1	0	0	1	1	0	2	6
<b>SUB-TOTAL</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>9</b>
<b>COMPLAINT HANDLING/INVESTIGATIONS</b>												
Failure to prosecute	0	0	0	1	0	0	0	0	5	0	0	6
Failure to take complaint	0	1	0	1	0	1	0	0	0	0	13	16
Delay in Dispensing Justice	0	0	0	4	3	0	0	5	6	1	7	26
<b>SUB TOTAL</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>5</b>	<b>11</b>	<b>1</b>	<b>20</b>	<b>48</b>
<b>OPPRESSIVENESS/ABUSE OF POWER</b>												
Intimidation or Harassment	0	0	0	1	0	0	0	0	7	0	2	10
Assault by Public Officer	2	2	1	0	2	0	3	1	0	0	2	13

Unlawful Arrest/Detention	0	0	0	0	3	1	2	2	1	0	4	13
Abuse of Office	1	1	0	1	3	0	1	6	18	0	7	38
<b>SUB TOTAL</b>	<b>3</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>8</b>	<b>1</b>	<b>6</b>	<b>9</b>	<b>26</b>	<b>0</b>	<b>15</b>	<b>74</b>
<b>SERVICE DELIVERY</b>												
Negligence	0	1	2	0	0	1	0	0	1	0	0	5
<b>SUB TOTAL</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>5</b>
<b>DISCIPLINE</b>												
Suspension/Interdiction	0	0	0	0	0	0	0	0	0	0	1	1
Dismissal from School	1	0	0	0	0	0	0	0	0	0	0	1
<b>SUB TOTAL</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>1</b>	<b>2</b>
<b>OTHER INJUSTICE</b>												
Improper Withholding or seizure of Document	5	0	1	2	0	0	1	0	3	0	2	14
Denial of Promotion	0	0	0	0	0	0	0	0	1	0	1	2
Arbitrary Transfer	0	0	0	1	4	0	0	0	2	0	3	10
Unfair Treatment	4	0	1	1	1	0	2	11	1	1	21	43
Denial of Bail	0	0	0	0	0	0	0	0	0	0	4	4
Others	12	0	2	2	5	1	9	4	9	11	15	70
<b>SUB TOTAL</b>	<b>21</b>	<b>0</b>	<b>4</b>	<b>6</b>	<b>10</b>	<b>1</b>	<b>12</b>	<b>15</b>	<b>16</b>	<b>12</b>	<b>46</b>	<b>143</b>
<b>GRAND-TOTAL</b>	<b>30</b>	<b>13</b>	<b>9</b>	<b>21</b>	<b>29</b>	<b>11</b>	<b>25</b>	<b>43</b>	<b>83</b>	<b>24</b>	<b>126</b>	<b>414</b>

## Appendix E: Nature of Corruption Complaints Received According to Regions and Head Office: 2019

ALLEGATIONS OF CORRUPTION	H.O	U/E	U/W	A/R	B/A	N/R	W/R	C/R	G/R	V/R	E/R	TOTAL
Misappropriation	3	0	0	4	0	0	0	0	0	0	1	8
Conflict of Interest	8	0	0	0	0	1	0	0	0	3	0	12
Fraud	4	1	1	1	2	1	0	0	0	0	0	10
Non-Disclosure of Assets	3	0	0	0	0	0	0	0	0	0	0	3
Extortion	3	2	0	6	2	3	0	0	0	0	0	15
Procurement Breaches	2	0	0	0	0	0	0	0	0	0	0	2
Diversion	0	0	1	0	1	0	0	0	0	1	0	3
Embezzlement	0	0	0	2	0	0	1	0	0	0	0	3
Abuse of Office	1	0	0	0	0	0	0	0	0	0	0	1
<b>SUB-TOTAL</b>	<b>23</b>	<b>3</b>	<b>2</b>	<b>13</b>	<b>5</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>57</b>
WHISTLE BLOWER	H.O	U/E	U/W	A/R	B/A	N/R	W/R	C/R	G/R	V/R	E/R	TOTAL
Misappropriation	2	0	0	1	0	0	0	0	0	0	0	3
Tax Evasion	1	0	0	0	0	0	0	0	0	0	0	1
Procurement Breaches	1	0	0	0	0	0	0	0	0	0	0	1
Extortion	0	0	0	0	0	1	0	0	0	0	0	1
Fraud	1	0	0	0	0	1	0	0	0	0	0	2
Conflict of Interest	1	0	0	0	0	0	0	0	0	0	0	1
<b>SUB-TOTAL</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9</b>
<b>GRAND- TOTAL</b>	<b>29</b>	<b>3</b>	<b>2</b>	<b>14</b>	<b>5</b>	<b>7</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>66</b>

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

RESPONDENT BODIES	E/R	U/W	U/E	C/R	B/A	W/R	V/R	ASH	G/R	HDO	NR	TOT
Private Individual	556	249	230	636	1,845	659	1458	1,692	200	152	253	7,930
Private Companies	7	7	4	7	17	14	14	31	33	10	13	157
Insurance Companies	1	3	1	2	13	2	0	1	1	4	2	30
Associations/Unions	0	2	6	2	5	2	1	12	4	1	15	50
Hotels	1	0	0	1	0	1	1	1	1	1	0	7
Banks/Financial Institutions	2	6	5	9	11	3	4	3	1	5	1	50
Security Companies	0	2	1	0	6	6	1	8	4	1	6	35
Private Schools	2	1	0	3	7	4	4	27	15	1	0	64
Churches	0	0	0	0	2	3	0	1	0	1	0	7
Private Enterprises	2	1	0	0	1	0	1	7	8	4	0	24
Private Hospitals	2	0	0	1	2	0	0	6	1	0	0	12
Chieftaincy Institution	0	0	0	1	0	2	1	0	0	2	0	6
Radio Stations	0	0	0	0	0	1	2	1	0	0	0	4
Embassy	0	0	0	0	0	0	0	0	0	3	0	3
<b>TOTAL</b>	<b>573</b>	<b>271</b>	<b>247</b>	<b>662</b>	<b>1,909</b>	<b>697</b>	<b>1487</b>	<b>1,790</b>	<b>268</b>	<b>185</b>	<b>290</b>	<b>8,379</b>



## Appendix G: Respondent Bodies in Administrative Justice Complaints Received: 2019

RESPONDENT BODIES	E/R	U/W	U/E	C/R	B/A	W/R	V/R	ASH	G/R	HO	NR	TOT
Tertiary Educational Institutions	0	6	0	3	1	0	1	1	0	1	1	14
Ghana Education Service	2	2	2	1	4	8	3	10	0	10	1	43
Controller & Accountant General	0	0	0	1	0	0	1	2	0	3	0	7
SSNIT	0	0	1	0	2	0	1	5	2	3	1	15
Judicial service	1	0	0	0	0	1	2	1	1	2	0	8
Insurance Companies	0	0	0	0	0	0	0	0	0	1	1	2
Financial Institutions (Banks)	0	9	1	1	2	0	0	3	0	4	0	20
Animal Research Institute	0	0	0	0	0	0	0	0	0	1	0	1
Ghana Pharmaceutical Council	0	0	0	0	0	0	0	0	0	1	0	1
Mineral Commission	0	0	0	0	0	0	0	0	0	1	0	1
Birth and Death	0	1	0	0	1	0	0	0	0	1	0	3
Ghana water company	0	0	0	0	0	1	1	3	0	2	0	7
Metropolitan, Municipal and District Assemblies (MMDAs)	2	1	2	2	1	0	7	10	1	5	5	36
NADMO	0	0	0	0	0	0	0	0	1	2	1	4
Customs Excise and Preventive Service (CEPS)	0	0	0	0	0	0	0	1	0	0	0	1
National Youth Employment Programme (NYEP)	0	0	1	0	0	0	3	0	1	0	0	5
Legal Aid	0	0	0	1	0	0	0	0	0	0	0	1
Ghana Health Service	1	2	1	1	3	1	3	2	1	2	4	21
Ghana Police Service	1	6	4	7	3	11	12	34	1	42	6	127
Ghana Armed Forces	0	0	0	0	0	0	0	1	0	3	0	4
Ghana River Authority (GRA)	0	1	0	0	0	1	0	0	0	0	0	2
Electricity Company of Ghana (ECG)	1	0	0	1	0	0	2	2	1	0	0	7

Ghana Communication Authority	0	0	0	0	0	0	0	0	1	0	0	1
Lands Commission	0	0	0	0	0	0	1	0	0	2	0	3
Department of social welfare	0	0	0	0	1	0	2	1	1	3	0	8
Forestry Commission	1	1	0	0	1	0	0	2	0	0	0	5
Ministry of Local Government and Rural	0	0	0	0	0	0	1	0	0	1	0	2
Ministry of Food and Agriculture	0	0	0	0	1	0	0	0	0		0	1
CHRAJ	0	0	0	0	0	0	1	0	0	4	0	5
Attorney General Department	0	0	0	0	0	0	0	0	0	0	1	1
COCOBOD	0	0	0	0	1	0	0	0	0	0	1	2
Ministry of National Security	0	0	0	0	0	0	0	0	0	1	0	1
National Service Secretariat	0	0	0	0	0	0	0	0	0	1	0	1
National Refugee Board	0	0	0	0	0	0	0	0	0	2	0	2
Metro Mass Transit	0	0	0	0	0	1	4	0	0	1	0	6
Rent Office	0	0	0	1	0	0	0	1	0	1	0	3
Ghana Immigration Service	0	0	0	1	0	1	0	0	0	0	0	2
B. N. I	0	0	0	0	0	1	0	0	0	1	0	2
National Identification Authority	0	0	0	0	0	0	0	0	0	1	0	1
Non-Formal Education	0	0	0	0	0	0	0	0	0	1	0	1
Ministry of Defense	0	0	0	0	0	0	0	0	0	1	0	1
Office of the President	0	0	0	0	0	0	0	0	0	1	0	1
Ministry of Aviation	0	0	0	0	0	0	0	0	0	1	0	1
Ministry of Water and Sanitation	0	0	0	0	0	0	1	1	0	0	0	2
Ghana Broadcasting Corporation	0	0	0	1	1	0	0	0	0	5	0	7
Environmental Protection Agency	0	0	0	0	0	0	0	0	0	0	0	0

(EPA)												
Council for Scientific Research and (CSIR)	0	1	0	0	0	0	0	1	0	0	0	2
DVLA	0	0	1	0	0	0	0	1	0	1	0	3
Ministry of Trade and Industry	0	0	0	0	0	0	0	0	0	1	0	1
West Examination Council (WAEC)	0	0	0	0	0	0	0	1	0	1	0	2
Ministry of Foreign Affairs	0	0	0	0	0	0	0	0	0	1	0	1
Land Evaluation Board	0	0	0	0	0	0	0	0	0	2	0	2
Ministry of Finance	0	0	0	0	0	0	0	0	0	1	0	1
Passport Office	0	0	0	0	1	0	0	0	0	2	0	3
Ministry of Energy	0	0	0	0	1	0	0	0	0	0	0	1
NABCO	0	0	0	0	0	0	0	0	0	0	2	2
Ghana Highway Authority	0	0	0	0	0	0	0	0	0	1	0	1
Ghana Prisons Service	0	0	0	0	0	0	0	0	0	0	1	1
Ghana Labour Commission	0	0	0	0	0	0	0	0	0	2	0	2
Economic and Organized Crime (EOCO)	0	0	0	0	0	0	0	0	0	1	1	2
Ghana Investment Promotion	0	0	0	0	0	0	0	0	0	1	0	1
<b>TOTAL</b>	<b>9</b>	<b>30</b>	<b>13</b>	<b>21</b>	<b>24</b>	<b>26</b>	<b>46</b>	<b>83</b>	<b>11</b>	<b>125</b>	<b>26</b>	<b>414</b>

## Appendix H: Institutions of Officials to Whom Allegation of Corrupt Practices were lodged against

RESPONDENT BODIES	E/R	U/W	U/E	C/R	B/A	W/R	V/R	ASH	G/R	HO	NR	TOT
Ghana Education Service	0	1	0	0	0	0	0	0	0	1	0	2
Ghana Health Service	0	0	0	0	1	0	0	0	0	2	3	6
Tertiary Institutions	0	0	0	0	0	0	0	0	0	1	0	1
Ghana Police Service	0	0	1	0	0	0	0	3	0	1	0	5
National Service Secretariat	0	0	0	0	0	0	0	1	0	0	0	1
Judicial Service	0	0	0	0	0	0	0	0	0	1	0	1
Ghana Fire Service	0	0	0	0	0	0	0	0	0	0	1	1
Ministry of Communication	0	0	0	0	0	0	0	0	0	1	0	1
SSNIT	0	0	0	0	0	0	0	0	0	1	0	1
Private Individual	0	0	0	0	0	0	1	0	0	2	0	3
Produce Buying Company	1	0	0	0	0	0	0	1	0	0	0	2
Ghana Free Zone Authority	0	0	0	0	0	0	0	0	0	1	0	1
Forestry Commission	0	0	1	0	1	0	0	0	0	0	0	2
Electoral Commission	0	0	0	0	0	0	0	0	0	2	0	2
National Information Technology	0	0	0	0	0	0	0	0	0	1	0	1
Ministry of Transport	0	0	0	0	0	0	0	0	0	1	0	1
Public Procurement Authority (PPA)	0	0	0	0	0	0	0	0	0	3	0	3
Millennium Development Authority	0	0	0	0	0	0	0	0	0	1	0	1
Ghana Revenue Authority	0	0	0	0	0	0	0	0	0	2	0	2
National Population Council	0	0	0	0	0	0	0	0	0	2	0	2
National Identification Authority	0	0	0	0	0	0	0	0	0	0	1	1
Ghana Ports and Harbor Authority	0	0	0	0	0	0	0	0	0	1	0	1
Birth and Death Registry	0	0	0	0	1	0	0	1	0	0	0	2
Metro Mass Transit Limited	0	0	0	0	0	0	0	0	0	2	0	2
Parliament of Ghana	0	0	0	0	0	0	2	0	0	1	0	3
DVLA	0	0	1	0	0	0	0	0	0	0	0	1
MMDAs	0	1	0	0	1	1	1	4	0	2	2	12
Ghana Immigration Service	0	0	0	0	1	0	0	0	0	0	0	1
NABCO	0	0	0	0	0	0	0	2	0	0	0	2

Dept. of Feeder Roads	0	0	0	0	0	0	0	1	0	0	0	1
National Security	0	0	0	0	0	0	0	1	0	0	0	1
<b>TOTAL</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>5</b>	<b>1</b>	<b>4</b>	<b>14</b>	<b>0</b>	<b>29</b>	<b>7</b>	<b>66</b>

## Appendix I: Nature of Human Rights Complaints and Mode of Closure

NATURE OF ABUSES	NATURE OF CLOSURE							
CHILDREN'S RIGHTS RELATED ABUSES	MEDIATION	PRELIMINARY INVESTIGATION	FULL INVESTIGATION	DISCONTINUED	REFERRED	REFUSE TO INVESTIGATE	LACK OF MANDATE	TOTAL
Right of Access to Natural Parents	170	7	0	73	7	0	4	261
Right to Health	11	0	0	4	0	0	0	15
Right to Education	95	0	1	45	7	0	4	152
Child labour	6	0	0	1	2	0	0	9
Right to Paternity	65	1	0	43	5	1	1	116
Right to Maintenance (necessaries of life)	1300	16	0	635	53	11	10	2025
Inhuman Treatment (maltreatment)	3	0	0	3	0	0	1	7
Child Trafficking	2	0	0	0	0	0	0	2
Child Custody	145	0	0	92	72	0	56	365
Early and Forced Marriage	15	0	0	9	8	0	0	32
Right to Name	25	0	0	8	1	0	1	35
Defilement	0	0	0	0	6	0	8	14
<b>SUB-TOTAL</b>	<b>1837</b>	<b>24</b>	<b>1</b>	<b>913</b>	<b>161</b>	<b>12</b>	<b>85</b>	<b>3033</b>
<b>WOMEN'S RIGHTS</b>								
<b>Violence Against Women</b>								
➤ Battery	42	1	0	41	4	1	7	96
➤ Psychological, Emotional	170	0	0	65	12	0	13	260
Spousal rights to maintenance	188	1	1	137	5	2	2	336
Reproductive Health Rights	163	2	1	96	20	1	3	286
Sexual Harassment	2	0	0	3	1	0	1	7
Rape	0	0	0	0	3	0	0	3

<b>SUB-TOTAL</b>	<b>565</b>	<b>4</b>	<b>2</b>	<b>342</b>	<b>45</b>	<b>4</b>	<b>26</b>	<b>988</b>
<b>PROPERTY RIGHTS</b>								
Right to Own Property	481	10	3	263	36	5	20	818
Inheritance	111	5	0	85	9	0	3	213
Destruction	62	2	2	36	3	0	1	106
Trespass/Encroachment	36	0	0	36	4	0	13	89
Title	2	0	0	3	1	1	13	20
Intestate Succession PNDCL111	54	0	0	26	2	1	18	101
<b>SUB-TOTAL</b>	<b>746</b>	<b>17</b>	<b>5</b>	<b>449</b>	<b>55</b>	<b>7</b>	<b>68</b>	<b>1347</b>
<b>ECONOMIC, SOCIAL AND CULTURAL RIGHTS (ECOSOC)</b>								
Freedom of Worship/Religion	1	0	0	2	0	0	0	3
Right to Work	5	0	0	5	2	0	1	13
<b>Harmful Cultural Practices</b>								
➤ Banishment	5	0	0	1	1	0	0	7
➤ Witchcraft Accusation/Molest ation	2	0	0	2	2	0	3	9
Right to Health	30	1	0	8	1	0	0	40
Right to clean and Healthy Environment	12	1	0	9	2	0	1	25
Right to housing/shelter	14	1	0	8	1	0	0	24
Right to Marry and found a family	6	1	0	1	0	0	1	9
Forced Eviction	130	0	0	73	10	0	9	222
Breach of Agreement	625	5	0	235	21	4	42	932
Tenancy/Landlord related Abuses	267	2	0	88	23	0	91	471
Right to Life	4	0	0	5	9	0	13	31
Labour Rights	243	8	4	170	31	1	49	506
Discrimination	2	0	0	3	1	0	0	6
Others	152	7	2	75	15	0	171	422
<b>SUB-TOTAL</b>	<b>1498</b>	<b>26</b>	<b>6</b>	<b>685</b>	<b>119</b>	<b>5</b>	<b>381</b>	<b>2720</b>
<b>CIVIL AND POLITICAL RIGHTS</b>								

Right to Personal Liberty (Harassment)	101	2	0	62	6	0	8	179
Right to Dignity (Inhuman Treatment)	91	0	0	51	8	0	15	165
Freedom of Association	2	1	0	1	0	0	0	4
Right to Privacy	2	1	0	3	0	0	1	7
Others	0	0	0	0	0	0	2	2
<b>SUB-TOTAL</b>	<b>196</b>	<b>4</b>	<b>0</b>	<b>117</b>	<b>14</b>	<b>0</b>	<b>26</b>	<b>357</b>
<b>GRAND-TOTAL</b>	<b>4842</b>	<b>75</b>	<b>14</b>	<b>2506</b>	<b>394</b>	<b>28</b>	<b>586</b>	<b>8445</b>



## Appendix J: Nature of Administrative Justice Complaints and Mode of Closure

NATURE OF INJUSTICE	NATURE OF CLOSURE							
<i>CESSATION OF EMPLOYMENT</i>	MEDIATION	PRELIMINARY INVESTIGATION	FULL INVESTIGATION	DISCONTINUED	REFERRED	REFUS TO INVESTIGATE	LACK OF MANDATE	TOTAL
Premature Retirement	3	1	0	0	2	0	0	6
Unlawful Termination of Appointment	3	1	2	5	0	0	2	13
Unlawful Dismissal	1	1	1	4	1	0	4	12
<b>SUB-TOTAL</b>	<b>7</b>	<b>3</b>	<b>3</b>	<b>9</b>	<b>3</b>	<b>0</b>	<b>6</b>	<b>31</b>
<i>ENTITLEMENT</i>								
Failure to pay salary	16	3	3	19	1	0	0	42
Unauthorized deductions of salaries	5	0	0	3	0	0	0	8
Failure to Pay Pension Allowances	4	1	2	3	0	0	1	11
Failure to pay End of Service Entitlement	2	2	1	3	0	0	0	8
Failure to pay allowances	4	0	0	2	1	0	0	7
Failure to Pay SSNIT contribution	0	1	0	5	0	0	0	6
Others	1	1	0	1	1	0	1	5
<b>SUB-TOTAL</b>	<b>32</b>	<b>8</b>	<b>6</b>	<b>36</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>87</b>
<i>PROPERTY</i>								
Arbitrary confiscation of property by State or Public Official	0	1	1	6	0	0	1	9
Destruction of property	2	0	0	3	0	0	3	8
<b>SUB-TOTAL</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>17</b>
<i>COMPLAINT HANDLING/ INVESTIGATIONS</i>								
Failure to be given a hearing (unfair hearing)	0	0	0	0	1	0	0	1
Failure to prosecute	0	0	3	1	0	0	1	5
Failure to take complaint	3	1	1	3	1	0	7	16
Delay in Dispensing Justice	6	4	0	9	4	0	7	30
<b>SUB-TOTAL</b>	<b>9</b>	<b>5</b>	<b>4</b>	<b>13</b>	<b>6</b>	<b>0</b>	<b>15</b>	<b>52</b>
<i>OPPRESSIVENESS/ABUSE OF POWER</i>								

Intimidation or Harassment	1	0	0	2	0	0	2	5
Assault by public officer	4	4	1	3	0	0	1	13
Unlawful Arrest/Detention	5	0	1	2	0	0	4	12
Abuse of Office	10	3	2	13	1	0	1	30
<b>SUB TOTAL</b>	<b>20</b>	<b>7</b>	<b>4</b>	<b>20</b>	<b>1</b>	<b>0</b>	<b>8</b>	<b>60</b>
<b>SERVICE DELIVERY</b>								
Negligence	0	1	0	2	0	0	0	3
<b>SUB-TOTAL</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>
<b>DISCIPLINE</b>								
Suspension/Interdiction	0	0	0	1	0	0	0	1
<b>SUB-TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>OTHER INJUSTICE</b>								
Delay in Promotion	1	0	1	1	0	0	0	3
Improper Withholding or seizure of documents	3	1	0	9	0	2	1	16
Denial of Promotion	1	0	0	1	0	0	0	2
Arbitrary Transfer	3	0	1	4	0	0	0	8
Unfair Treatment	8	3	1	7	2	0	9	30
Discrimination	0	0	0	4	0	0	0	4
Others	18	4	1	15	3	0	12	53
<b>SUB-TOTAL</b>	<b>34</b>	<b>8</b>	<b>4</b>	<b>41</b>	<b>5</b>	<b>2</b>	<b>22</b>	<b>116</b>
<b>GRAND-TOTAL</b>	<b>104</b>	<b>33</b>	<b>22</b>	<b>131</b>	<b>18</b>	<b>2</b>	<b>57</b>	<b>367</b>

## Appendix K: Nature of Corruption Cases and Mode of Closure

ALLEGATIONS OF CORRUPTION	NATURE OF CLOSURE						
NATURE OF CORRUPTION	PRELIMINARY INVESTIGATION	FULL INVESTIGATION	DISCONTINUED	REFERRED	REFUSE TO INVESTIGATE	LACK OF MANDATE	TOTAL
Bribery	0	1	0	0	0	0	1
Misappropriation of funds	4	3	0	0	0	0	7
Embezzlement	2	1	0	0	0	0	3
Extortion	4	0	2	2	0	0	10
Diversion	1	0	0	0	0	0	1
Abuse of Office	2	2	7	1	0	0	14
<b>SUB-TOTAL</b>	<b>13</b>	<b>7</b>	<b>9</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>35</b>
<b>WHISTLEBLOWER</b>							
Extortion	1	0	0	0	0	0	1
<b>GRAND-TOTAL</b>	<b>17</b>	<b>7</b>	<b>9</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>36</b>

## Appendix L: Sex Distribution of Complainants in Human Rights

NATURE OF ABUSES	MALE	FEMALE	TOTAL
<b>CHILDREN'S RIGHTS</b>			
Right of Access to Natural Parents	164	100	264
Right to Health	4	15	19
Right to Education	81	70	151
Child labour	4	7	11
Right to Paternity	41	81	122
Right to Maintenance (necessaries of life)	215	1,713	1,928
Inhuman Treatment (maltreatment)	10	7	17
Child Trafficking	2	1	3
Child Custody	166	174	340
Early and Forced Marriage	5	27	32
Right to Name	1	36	37
Defilement	5	11	16
<b>SUB-TOTAL</b>	<b>698</b>	<b>2,242</b>	<b>2,940</b>
<b>WOMEN'S RIGHTS</b>			
Violence Against Women			
➤ Battery	26	72	98
➤ Psychological, Emotional	63	190	253
Spousal rights to maintenance	28	290	318
Reproductive Health Rights	53	235	288
Sexual Harassment	2	7	9
Rape	0	4	4
<b>SUB-TOTAL</b>	<b>172</b>	<b>798</b>	<b>970</b>
<b>PROPERTY RIGHTS</b>			
Right to Own Property	396	408	804
Inheritance	105	113	218
Destruction	83	36	119
Trespass/Encroachment	69	25	94
Title	17	5	22
Intestate Succession (PNDCL111)	35	70	105
<b>SUB-TOTAL</b>	<b>705</b>	<b>657</b>	<b>1362</b>

<b>ECONOMIC, SOCIAL AND CULTURAL RIGHTS (ECOSOC)</b>			
Freedom of Worship/Religion	1	5	6
Right to Work	9	4	13
Harmful Cultural Practices			
➤ Banishment	5	2	7
➤ Witchcraft Accusation/Molestation	3	6	9
Right to Health	11	29	
Right to clean and Healthy Environment	18	5	23
Right to housing/shelter	6	11	17
Right to Marry and found a family	0	9	9
Forced Eviction	105	107	212
Breach of Agreement	603	387	990
Tenancy/Landlord related Abuses	293	175	468
Right to Life	15	18	33
Labour Related Abuses	364	141	505
Discrimination	7	2	9
others	253	165	418
<b>SUB-TOTAL</b>	<b>1693</b>	<b>1066</b>	<b>2759</b>
<b>CIVIL AND POLITICAL RIGHTS</b>			
Right to Personal Liberty (Harassment)	74	85	159
Right to Dignity (Inhuman Treatment)	74	108	182
Freedom of Association	2	1	3
Right to Privacy	2	2	4
<b>SUB-TOTAL</b>	<b>152</b>	<b>196</b>	<b>348</b>
<b>GRAND-TOTAL</b>	<b>3,420</b>	<b>4,959</b>	<b>8,379</b>

## Appendix M: Sex Distribution of Complainants in Administrative Justice - Complaints

NATURE OF INJUSTICE	MALE	FEMALE	TOTAL
<b>CESSATION OF EMPLOYMENT</b>			
Premature Retirement	2	0	2
Unlawful Termination of Appointment	13	4	17
Unlawful Dismissal	13	1	14
<b>SUB TOTAL</b>	<b>28</b>	<b>5</b>	<b>33</b>
<b>ENTITLEMENT</b>			
Failure to pay salary	37	10	47
Unauthorized deductions of salaries	6	3	9
Failure to Pay Pension Allowances	9	2	11
Failure to pay End of Service Entitlement	3	2	5
Failure to pay allowances	8	0	8
Failure to Pay Transfer Grants	1	0	1
Failure to Pay SSNIT contribution	9	5	14
Others	4	1	5
<b>SUB-TOTAL</b>	<b>77</b>	<b>23</b>	<b>100</b>
<b>PROPERTY</b>			
Arbitrary confiscation of property by State or Public	2	1	3
Destruction of property	6		6
<b>SUB-TOTAL</b>	<b>8</b>	<b>1</b>	<b>9</b>
<b>COMPLAINT HANDLING/INVESTIGATIONS</b>			
Failure to prosecute	5	1	6
Failure to take complaint	12	4	16
Delay in Dispensing Justice	22	4	26
<b>SUB-TOTAL</b>	<b>39</b>	<b>9</b>	<b>48</b>
<b>OPPRESSIVENESS/ABUSE OF POWER</b>			
Intimidation or Harassment	7	3	10
Assault by Public Officer	12	1	13
Unlawful Arrest/Detention	10	3	13
Abuse of Office	27	11	38
<b>SUB TOTAL</b>	<b>56</b>	<b>18</b>	<b>74</b>
<b>SERVICE DELIVERY</b>			

Negligence	2	3	5
<b>SUB TOTAL</b>	<b>2</b>	<b>3</b>	<b>5</b>
<b>DISCIPLINE</b>			
Suspension/Interdiction	1	0	1
Rustication	0	1	1
<b>SUB TOTAL</b>	<b>1</b>	<b>1</b>	<b>2</b>
<b>OTHER INJUSTICES</b>			
Improper Withholding or seizure of documents	13	1	14
Denial of Promotion	2	0	2
Arbitrary Transfer	9	1	10
Unfair Treatment	39	4	43
Denial of Bail	3	1	4
Others	56	14	70
<b>SUB-TOTAL</b>	<b>122</b>	<b>21</b>	<b>143</b>
<b>GRAND-TOTAL</b>	<b>333</b>	<b>81</b>	<b>414</b>

## Appendix N: Sex Distribution of Complainants in Corruption Allegations

ALLEGATIONS OF CORRUPTION	MALE	FEMALE	TOTAL
Misappropriation of funds	8	0	8
Embezzlement	2	0	2
Extortion	4	4	8
Conflict of Interest	7	1	8
Fraud	2	0	2
Diversion	1	0	1
Failure to declare assets	1	0	1
Procurement Breaches	2	0	2
Abuse of Office	14	0	14
<b>SUB-TOTAL</b>	<b>41</b>	<b>5</b>	<b>46</b>
<b>GRAND-TOTAL</b>	<b>41</b>	<b>5</b>	<b>46</b>



## Appendix P: ORGANOGRAM:

### CHRAJ ORGANOGRAM

