



ACCET

AFRICA CENTRE FOR
CRITICAL MINERALS &
ENERGY TRANSITION



Guiding Policy

SEXUAL HARASSMENT & WORKPLACE MISCONDUCT POLICY

Approved by the Governing Council: March 2026

www.accetafrica.org



Sexual Harassment & Workplace Misconduct Policy

1. Purpose

This policy affirms ACCEIT's **zero tolerance** for sexual harassment and workplace misconduct in all its forms. It establishes clear definitions, reporting channels, investigative procedures, and disciplinary measures to protect employees, fellows, interns, consultants, and stakeholders.

2. Scope

This policy applies broadly to all individuals connected with ACCET and covers diverse settings where misconduct may occur:

A. Who is Covered

- **Employees:** Permanent, contract, temporary, part-time staff.
- **Interns & Fellows:** Regardless of stipend status.
- **Consultants & Contractors:** Anyone engaged under a service agreement.
- **Board, Governing Council & Advisory Members.**
- **Volunteers, Visitors, and Partner Representatives** engaged with ACCET.

B. Where it Applies

- **ACCET offices, regional offices, and field sites.**
- **Work-related travel, missions, workshops, and conferences** (local or international).
- **Social events** organized by or connected to ACCET.
- **Virtual spaces:** online meetings, emails, messaging apps, collaboration platforms.
- **Third-party premises:** when staff are representing ACCET in partner organizations or joint projects.

C. Types of Misconduct Covered

- Sexual harassment (verbal, non-verbal, physical, or online).
- Gender-based harassment or discrimination.
- Bullying, intimidation, or abuse of power.
- Retaliation against those who report misconduct or participate in investigations.

3. Definitions

Sexual Harassment

As per ILO and Ghana Labour Act, sexual harassment includes any **unwelcome sexual advance, request for sexual favour, verbal, non-verbal, or physical conduct of a sexual nature** that:

- Creates a hostile, intimidating, or offensive work environment.
- Interferes with an individual's work performance.
- Is made a condition of employment, promotion, or benefits (*quid pro quo harassment*).

Examples:

- Unwelcome touching, hugging, or physical advances.
- Suggestive jokes, sexual comments, or gestures.
- Display of sexually explicit materials in the workplace.
- Repeated requests for dates or sexual favours.
- Threats of retaliation if advances are rejected.
- Harassment via email, text, or social media.

Other Workplace Misconduct Covered

- Bullying or intimidation.
 - Retaliation against individuals who report harassment.
 - Abuse of authority or power imbalance.
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4. Policy Statement

ACCET affirms a **zero tolerance** approach to sexual harassment and workplace misconduct.

1. **Non-Negotiable:** Harassment in any form is unacceptable, regardless of rank, gender, or intent.
 2. **Commitment to a Safe Workplace:** ACCET is dedicated to creating an environment where all individuals feel safe, respected, and valued.
 3. **Victim-Centered:** Complaints will be handled sensitively, with respect for dignity, confidentiality, and protection against retaliation.
 4. **Due Process:** Alleged perpetrators will have the right to respond to allegations, and cases will be judged fairly and objectively.
 5. **Beyond Compliance:** ACCET's standard goes beyond Ghana's labour law — it reflects global good practices (ILO, UN Women, SDG 5).
 6. **Shared Responsibility:** Every staff member has a duty to prevent harassment by modeling professional behaviour, reporting incidents, and supporting affected colleagues.
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5. Responsibilities

- **Governing Council:** Provides oversight and ensures accountability.
- **Executive Director:** Ensures institutional enforcement, allocates resources, and sets the tone of leadership.
- **HR Department / Gender & Diversity Focal Point:** Primary contact for reporting, records management, training, and follow-up.
- **Supervisors & Managers:** Promote safe team environments, respond immediately to incidents, and support reporting.

- **All Staff:** Required to maintain respectful conduct and report observed or experienced harassment.
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6. Reporting Procedures

A. How to Report

- **Direct Reporting:** To HR, the Gender & Diversity Focal Point, or a line manager.
- **Confidential Email/Hotline:** A dedicated email/phone line will be provided for confidential reporting.
- **Anonymous Reporting:** Through a suggestion box or digital form, with optional identity disclosure.
- **Third-Party Reporting:** Witnesses or colleagues may report incidents on behalf of victims.

B. What to Report

- Any incident of sexual harassment, inappropriate conduct, or retaliation.
- Reports may include: date, time, location, description of incident, names of persons involved, and witnesses (if available).

C. Protections for Complainants

- **Confidentiality:** Information shared will be disclosed only to those handling the case.
- **Non-Retaliation:** Any retaliation against complainants or witnesses will itself be treated as serious misconduct.
- **Interim Measures:** ACCET may offer temporary work reassignments, leave, or other protections while an investigation is ongoing.

D. Timeframe

- Complaints should ideally be reported within **30 days of the incident**, but late reports will still be considered if circumstances justify the delay.
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7. Investigation Process

A. Receipt of Complaint

- HR/Diversity Focal Point logs the complaint, acknowledges receipt within **5 working days**, and informs the complainant of next steps.

- If the complaint involves HR or ED, the matter is escalated directly to the Governing Council's **Ethics or Audit & Risk Committee**.

B. Preliminary Assessment

- HR/Investigation Lead determines whether the complaint is admissible (falls within scope, has sufficient detail).
- If admissible, a **Formal Investigation Committee (FIC)** is established.

C. Composition of the Investigation Committee

- HR Representative.
- Gender & Diversity Focal Point.
- A senior manager from another department (neutral).
- An external independent expert (if deemed necessary).
- Gender balance must be ensured.

D. Investigation Steps

1. **Notification:** The alleged perpetrator is formally informed of the complaint and given a chance to respond.
2. **Fact-Finding:**
 - Interviews with complainant, alleged perpetrator, and witnesses.
 - Review of documents, emails, CCTV, chat logs, or other evidence.
3. **Confidentiality:** All proceedings are private; records are stored securely.
4. **Timeline:** Investigations must be completed within **30 working days**, extendable by GC/ED for complex cases.

E. Findings & Report

- The committee produces a written report summarizing evidence, findings, and recommendations.
- Report is submitted to the **Executive Director** (or Governing Council if ED is implicated).

F. Decision & Sanctions

- Based on the report, appropriate sanctions are applied (warning, training, suspension, termination, referral to law enforcement).
- Complainant and alleged perpetrator are informed in writing of the outcome.

G. Appeals

- Either party may appeal to the Governing Council within **14 days** of receiving the decision.
 - Appeals may only challenge the process or proportionality of sanctions, not the factual findings unless new evidence arises.
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8. Disciplinary Measures

AC CET applies a **zero tolerance** approach: substantiated cases of sexual harassment or related misconduct will result in firm disciplinary action, proportionate to the severity of the offence.

A. Range of Sanctions

Depending on the findings of the investigation, disciplinary measures may include:

1. **Verbal Warning** – for minor misconduct, documented in HR records.
2. **Written Warning** – formal notice outlining the misconduct and consequences for repetition.
3. **Mandatory Training or Counselling** – requiring attendance at behavioural or sensitivity training sessions.
4. **Suspension (with or without pay)** – temporary removal from duties pending corrective action.
5. **Demotion or Reassignment** – change of role or responsibilities where appropriate.
6. **Termination of Employment or Contract** – dismissal for serious or repeated misconduct.
7. **Contract Termination for Third Parties** – suppliers, consultants, or contractors found culpable may have contracts cancelled and be barred from future work.
8. **Referral to Law Enforcement** – if the misconduct amounts to a criminal offence under Ghanaian law.

B. Aggravating Factors

Sanctions will be more severe if:

- There is an abuse of authority (e.g., manager exploiting power imbalance).
- The harassment is repeated or sustained over time.
- The harassment involves threats or retaliation.
- The victim is a vulnerable person (e.g., intern, junior staff, community member).

C. Due Process

- No sanction will be applied without a fair and documented investigation.
- Both complainant and alleged perpetrator will be informed of the outcome and sanction in writing.
- The right to appeal is guaranteed (as earlier outlined).

9. Support for Survivors

AC CET is survivor-centred: protecting and supporting victims of harassment is a priority.

A. Confidentiality & Privacy

- Survivors' identities will be protected at every stage.
- Only individuals directly involved in handling the case will access case information.

B. Safety & Work Adjustments

- Survivors may request temporary or permanent reassignment.
- Flexible working hours or leave may be granted to reduce exposure or stress.
- Immediate separation from the alleged perpetrator (without penalizing the survivor).

C. Psychosocial & Medical Support

- Access to counselling and mental health services will be facilitated.
- Survivors will be provided with referrals to external medical, legal, and psychosocial services when necessary.

D. Legal Assistance

- Survivors will be informed of their rights under Ghana's Labour Act and Domestic Violence Act.
- ACCET will support reporting to law enforcement if the survivor wishes, and ensure cooperation with legal processes.

E. Non-Retaliation Guarantee

- Any retaliation (dismissal, demotion, intimidation, exclusion, gossip) against survivors or witnesses will be treated as **severe misconduct**.
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10. Training & Awareness

Prevention is as important as enforcement. ACCET commits to continuous education of staff and stakeholders.

A. Mandatory Training

- **Onboarding Training:** All new staff, interns, fellows, and consultants receive training on sexual harassment and workplace conduct during induction.
- **Annual Refresher Courses:** All personnel must attend yearly training on harassment prevention, respectful behaviour, and reporting procedures.
- **Manager Training:** Supervisors and managers receive additional training on handling complaints, protecting victims, and ensuring accountability.

B. Awareness Campaigns

- Posters, brochures, and digital reminders displayed in offices and circulated internally.

- Regular “Respect at Work” messages in internal newsletters and emails.
- Dedicated **Sexual Harassment Awareness Month** with learning sessions and panel discussions.

C. Extended Outreach

- Workshops for field staff, contractors, and community partners.
- Tailored sessions for vulnerable groups (interns, junior staff, women in male-dominated areas like mining & energy).

D. Monitoring Knowledge

- Staff tested via quizzes/surveys to confirm understanding.
 - Training attendance logged by HR; non-compliance reported to the Executive Director.
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11. Monitoring & Review

A. Tracking Cases & Outcomes

- HR/Gender Focal Point will maintain a confidential **Harassment Register** recording:
 - Number of complaints filed.
 - Type of complaint.
 - Time taken to resolve.
 - Sanctions applied.
 - Outcomes of appeals (if any).
- The register will exclude personal identifiers but provide useful trends.

B. Oversight & Reporting

- A **bi-annual report** will be submitted to the Governing Council’s Audit & Risk Committee summarizing cases and systemic lessons.
- Key findings (without personal details) may be included in ACCET’s **Annual Report** to demonstrate transparency.

C. Policy Review Cycle

- The policy will be reviewed every **3 years** or earlier if:
 - There is a major legal change (e.g., amendments to Ghana’s Labour or Domestic Violence Acts).
 - Donor or partner requirements change.
 - Monitoring shows gaps in effectiveness.

D. Continuous Improvement

- Feedback from survivors, staff, and stakeholders will inform updates.
 - Lessons learned from investigations will guide training, policy refinements, and institutional safeguards.
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12. Effective Date

This policy takes effect on **April 2026** upon approval by the Governing Council of ACCET.

13. Statement of Commitment

ACCET commits to providing a **safe, inclusive, and respectful environment** where everyone can thrive free from harassment, discrimination, or abuse.



ACCET

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