LIST OF ANNEXES

Annex 1   Summary of Programme Report for 2019
Annex 2   Fundraising Pipeline
Annex 3   STAR-Ghana Foundation List of Implementing Partners
Annex 4   STAR-Ghana Foundation Updated Programme Risk Register
Annex 5   STAR Ghana Foundation Safeguarding Policies

ABBREVIATIONS & ACRONYMS

• APNAC   African Parliamentary Network Against Corruption
• ARAP   Accountability, Rule of Law and Anti-corruption
• 3C&L   Convening, Coordinating, Catalysing and Learning
• CBOs   Community Based Organisation
• CoPL   Communities of Practice and Learning
• COG   Consortium Oversight Group
• CS   Civil Society
• CSO   Civil Society Organisations
• DAs   District Assemblies
• DCEs   District Chief Executives
• DFID   Department for International Development
• EC   Electoral Commission
• GACC   Ghana Anti-Corruption campaign coalition
• GBP   Great British Pounds
• GC   Governing Council
• GESI   Gender Equality and Social Inclusion
• GP(s)   Grant Partner(s)
• IGF   Internally Generated Funds
• HoC   Heads of Cooperation
• INE   Independent National Entity
• LI   Legislative Instrument
• MDAs   Ministries, Departments and Agencies
• M&E   Monitoring and Evaluation
• MMDAs   Municipal, Metropolitan and District Assemblies
• MMDCEs   Metropolitan, Municipal and District Chief Executive
• MoE   Ministry of Education
• MoH   Ministry of Health
• MP   Member of Parliament
• NACAP   National Anti-Corruption Action Plan
• NCCE   National Commission of Civic Education
• NYA   National Youth Authority
• PEA  Political Economy Analysis
• PMT  Programme Management Team
• PWD  Persons with Disability
• RCCs  Regional Coordinating Councils
• RTI  Right to Information
• SC  Steering Committee
• SHS  Senior High School
• SLE  Strategic Learning Events
• SMS  Short Messaging System
• STAAC  Strengthening Action Against Corruption
• STAR-Ghana  Strengthening Transparency, Accountability and Responsiveness in Ghana
• TOR  Terms of Reference
• WACSI  West African Civil Society Institute
• YEFL  Youth Empowerment for Life
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE CHAIR’S REPORT</td>
<td>7</td>
</tr>
<tr>
<td>THE EXECUTIVE DIRECTOR’S REPORT</td>
<td>9</td>
</tr>
<tr>
<td>OUR OBJECTIVES</td>
<td>13</td>
</tr>
<tr>
<td>OUR KEY PROGRAMME STRATEGIES AND APPROACHES</td>
<td>14</td>
</tr>
<tr>
<td>3 Cs &amp; L Approach</td>
<td>14</td>
</tr>
<tr>
<td>Communications</td>
<td>18</td>
</tr>
<tr>
<td>Embedded PEA (Political Economy Analysis)</td>
<td>19</td>
</tr>
<tr>
<td>ANNEXURES</td>
<td>21</td>
</tr>
<tr>
<td>Annex 2 - Fundraising Pipeline</td>
<td>24</td>
</tr>
<tr>
<td>Annex 3 - STAR-Ghana Foundation List of Implementing Partners</td>
<td>26</td>
</tr>
<tr>
<td>Annex 4 - STAR-Ghana Foundation Programme Risk Management Policy and Register</td>
<td>29</td>
</tr>
<tr>
<td>Annex 5 - STAR Ghana Foundation Safeguarding Policies</td>
<td>33</td>
</tr>
<tr>
<td>COMPANY ADMINISTRATIVE DETAILS</td>
<td>40</td>
</tr>
<tr>
<td>ACKNOWLEDGMENTS</td>
<td>40</td>
</tr>
</tbody>
</table>
STAR Ghana Foundation was launched in November 2018 as a centre for active citizenship and inclusive development. It was envisaged as a self-sustaining civil society support mechanism that would be embedded within Ghanaian civil society and with the leverage to facilitate coordinated civil society action. Such a facility had been identified as a critical requirement for enhancing civil society effectiveness particularly in a Ghana “Beyond Aid”.

Over the past year, the Governing Council (GC) has worked to ensure a smooth transition from the STAR Ghana Programme to the Foundation. This has been undertaken through various committees of the Council supported by the Secretariat. These committees whose members have been drawn from the Council and Subscribers include the following:

- The Finance and Audit Committee
- The Programme Quality Committee
- The Financing and Fundraising Committee
- The Gender and Social Inclusion Committee
- The Grants and Projects Committee
- The Transition Committee

The committees met quarterly to review the work of the Secretariat and make recommendations to the main Governing Council body at its quarterly meetings. We are grateful to the Subscribers who took time off their busy schedules to be part of these Committees.

As a result of our efforts, a number of important products have been generated including the Foundation’s manuals for Finance Management, Grants Management and Human Resources Management. The Foundation has also developed a Financing and Fundraising Strategy as well as a Gender and Social Inclusion Strategy.
With the support of Christian Aid, the Foundation received seconded staff to start its work and has recruited very competent persons for the first three full-time positions, including the Executive Director. A Memorandum of Understanding (MOU) and a decision-making framework were developed and signed between the Foundation, Christian Aid and the Department for International Development (DfID). This has streamlined the working relationships between the three parties, as the Foundation makes this important transition.

Admittedly, there was some initial uncertainty amongst some civil society actors about the work of the Foundation. However, we have been reassured by the many citizens and communities who have responded to the opportunity for involvement and the renewed sense of participatory action that the Foundation offers.

Across the length and breadth of our country, people are speaking out for what they believe in and their readiness to take action. This energy must be harnessed and taken advantage of by the Foundation to confirm its raison d’etre and undergird its legitimacy. The Foundation must highlight the need for inclusion and equality as a basic human right for our citizenry. Our convening role in civil society would bring people together to work towards the transformational change we need as a country.

Our work with, and through communities and our partners enjoin us to be vigilant about our own standards. This demands ongoing and rigorous attention to our code of conduct as well as the safeguarding policies which members of the Governing Council have signed up to.

In conclusion, the first year for the Foundation has been a demanding year, combining the challenges of a new organization with imperatives of national development. But it has also been a year of renewed energy in our determination to work more effectively, along with our partners to enhance the cause of active citizenship in this country.
Highlights

- The Foundation has seamlessly built upon work started by the STAR-Ghana programme around convening catalysing citizens’ actions on key local and national issues. Various convenings were organised in partnership with CSOs and Parliament around key issues such as youth unemployment, education, and health and involving over five million citizens.

- The Foundation is working with 26 CSOs, including FBOs, CBOs and national think tanks to develop and implement actions aimed at contributing to inclusive, credible and peaceful elections and a smooth transition. Over GHS 5,170,400 has been committed to support these actions.

- Over GHS 17,913,000 has been raised, through a grant from Christian Aid, to support citizens’ actions towards increased accountability and responsiveness of government at all levels to citizens’ issues and needs;

- Eight funding proposals are at various stages of finalisation and submission to international foundations and donor agencies to support the Foundation’s work.
1. Introduction

This report covers the activities of the STAR Ghana Foundation secretariat for the period November 2018, when the foundation was formally launched, to January 2020.

2. Key Activities During the Period:

a. Human Resources: At its start-up in 2018, the secretariat comprised staff of the STAR-Ghana programme seconded on part-time basis to support the development of the foundation’s operational systems and implementation of key activities. During the reporting period, three of the core staff of the secretariat have been employed and are leading on the implementation of its work. The core staff are the **Executive Director, the Grants and Due Diligence Manager and the Finance and Admin Manager**. Given the overlap between the work of the Foundation and the programme, particularly in the strategic oversight of the programme’s work and in the shared use of key staff and resources, the Executive Director continues to work as the Programme Director of the programme, with his time shared on a 50-50 basis between the programme and the Foundation. Processes for the recruitment of a Finance and Admin officer have been initiated and will be concluded during the next reporting period.

In addition to the three-core staff, a Governance Support Manager has been recruited, on the programme’s payroll, to support the Governing Council (GC) and its committees in their work. A fundraising advisor was also recruited, on the programme’s payroll, to support the foundation develop and implement strategies for fundraising. The advisor’s contract ended in December 2019; however, interviews have been conducted to recruit a fundraising manager on a consultancy basis to work with the secretariat in the development of fundraising products and building/strengthening donor relationships.

The Christian Aid led consortium of technical partners, comprising Christian Aid, Social Development Direct (SDD), Overseas Development Institute (ODI) and Nkum Associates have provided technical support to the foundation in its oversight of the STAR-Ghana programme and in the development of its own systems, manuals and policies.

The secretariat continues to rely on the programme management team (PMT) of the programme for the implementation of its activities. With the imminent closure of the programme in September 2020, and the start of PMT lay-offs beginning May 2020, the GC has been consulting on strategies to support the work of the foundation.

b. Programmatic work:

Elections 2020 Call: The foundation, with funding from DFID and support from the STAR-Ghana PMT, developed and implemented an Elections 2020 Call. The Call, the first to be implemented by the foundation outside of the STAR-Ghana programme, supports citizens’ actions at all levels of governance towards achieving peaceful, credible and inclusive elections in December. 26 CSOs, including media organisations, faith-based organisations (FBOs), community-based organisations (CBOs) and non-governmental organisations (NGOs) are being supported with grants totalling GHS5,170,400.

Convenings: The foundation, building on the experiences from the STAR-Ghana programme, facilitated convenings at national and local levels on salient issues.

The foundation supported three (3) convenings, under the aegis of the Speaker of Parliament, on the Affirmative Action bill, the Private Members’ Bill and the review of the Disability Act. These convenings provided effective spaces for dialogue between Parliament and civil society on key issues of inclusive governance,
Beyond Parliament, the foundation in partnership with CSO partners held other convenings on bridging the north-south development gap, promoting local philanthropy, corruption in the extractives sector among others.

c. Programme Implementation: The foundation ‘inherited’ 78 projects initiated by the STAR-Ghana programme under its various calls. The Governing Council and its committees have provided strategic oversight in the implementation of these projects and ensuring that they contribute to the achievement of the programme and foundation’s goal and purpose. A summary of the results achieved by these projects and their contribution to programme outcome are captured in Annex 2.

d. Fundraising and Networking: The main source of funding for the Foundation during the reporting period has been a grant of GHS 17,913,000 from Christian Aid under the STAR-Ghana programme.

A fundraising Advisor was recruited in 2019 to support the foundation develop its fundraising infrastructure, including strategies, donor mapping and establishment of relationships with key donors. By the end of the reporting period, STAR Ghana Foundation’s fundraising strategies have been finalised, a mapping of key donors and action plan for follow-up has been developed and a Concept Note and Road map for local philanthropy have been finalised.

Attached as Annex 2 is the fundraising pipeline as at the end of January 2020.

The foundation has been registered as a member of the African Philanthropy Network (APN) and Worldwide Initiatives for Grantmaker Support (WINGS). Membership of these networks will enable the foundation draw on their resources in its fundraising efforts and at the same time enable it establish relationships with key Foundations and Grantmakers.

A number of initiatives have been undertaken by the secretariat to support the foundation’s local fundraising efforts and promote local philanthropy more broadly. These include a partnership with the Global Fund for Community Foundations (GFCF) and the Charities Aid Foundation (CAF) to develop and test models for local fundraising and the foundation’s collaboration with the Ghana Philanthropy Network to develop and strengthen the local philanthropy ecosystem.

3. Analysis of Progress

Overall progress has been significant, given the challenges of setting up the systems and procedures at the same time as continuing with the implementation of programmes and embedding the foundation within the civil society context. Activities during the period have been likened to ‘constructing the ship while sailing it’.

Progress achieved during the period includes:
- Maintaining the momentum of initiatives started under the STAR-Ghana programme to promote active citizenship and contribute to good governance, even during the transition period.
- Developing and implementation of the Election 2020 Call, which will contribute significantly to achieving the foundation’s goals and objectives at the same time positioning it as a partner of choice for donors;
- Increased brand visibility and awareness of the foundation even as it manages the overlap with the STAR-Ghana programme;
- Successfully navigating its way within the civil society space and in its relationships with the state consistent with its values, principles and mission;
The main challenges encountered during the period have been:
- The work load on the PMT in balancing foundation and programme roles and activities. This has stretched capacity at critical periods;
- Linked to the above, the imminent end of the contracts of most members of the PMT in May 2020 raises concerns around the foundation’s capacity to implement activities post-May 2020. This risk is mitigated however by the possibility of receiving funding from DFID under an Accountable Grant subject to passing its due diligence assessment and approval of the foundation’s accountable grant proposal;
- The level of effort required of members of the GC and its committees during the period under review has been onerous. This is explained partly by the fact that the GC, in addition to the foundation’s core activities, is overseeing the implementation of the STAR-Ghana programme. It is hoped that as programme implementation draws down in the run-up to September 2020, the demand on the GC’s time will ease considerably.

4. Looking Forward

Key priorities for the secretariat in the next reporting period will include:
- Working towards a staffed secretariat with capacity to service the GC and its programmes;
- Prioritise fundraising from diverse sources to enable the foundation to develop and implement programmes in line with our vision and mission;
- Develop, test and share lessons on local giving.
Promoting active citizenship for change

The establishment of the STAR Ghana Foundation as an independent organisation in November 2018 was a landmark event. Led by the Steering Committee of the STAR Ghana programme, the establishment was the realisation of the ambitions and commitment of many people and diverse organisations, including the Funders’ Committee representing our core donors, the programme management consortium led by Christian Aid and, most importantly, the citizens of Ghana.

The STAR Ghana Foundation belongs to the people of Ghana. We create platforms for ordinary people, particularly the most marginalised in society, to become active citizens who demand positive change in their lives and communities.

Our vision and mission

Our vision is to see a well-informed and active Ghanaian citizenry able to contribute to transformational change that advances democracy, accountability and social inclusion.

We want to increase the effectiveness of citizens and civil society to achieve an equitable, inclusive society by convening inclusive dialogue and collaboration; catalysing active citizenship and collective action; coordinating and supporting strategic partnerships and facilitating continuous learning to fuel wider scale change.

Our ultimate goal is to ensure all citizens, regardless of gender, disability, age or location, are empowered to participate in decisions and raise concerns. We will continue to support a vibrant civil society to engage constructively with the government and drive forward a transformative development agenda that will leave nobody behind.
OUR KEY PROGRAMME STRATEGIES AND APPROACHES

The Foundation continues to implement specific strategies aimed at improving programme quality and delivery, ensuring sustainability and overall programme health. These strategies are designed to dovetail into each other providing a holistic mix of strategies and approaches that work together to achieve programme impact.

Two out of three independent reviews undertaken by external consultants provide assessment of the veracity of the interplay of the strategies and approaches implemented by the programme.

The July 2019 Independent Review evaluation of the STAR Ghana programme change process since 2015 stated: “STAR-Ghana effectively used different approaches (convenings, clusters, CoPL, grants to partners, engagement with Parliament and other state actors, engagement with the media and private sector) to achieve greater results.” The consultants provided examples such as the integration of the cluster approach with 3Cs and L, the use of PEA to understand the workings of Parliament and the mainstreaming of GESI across all our work.

The 2019 EU’s ARAP Mid-term Evaluation stated: “STAR-Ghana also supports and coaches beneficiary CSOs in a range of management and strategy development domains, including project design and M&E. The portfolio of projects with an anti-corruption dimension clearly benefited from STAR-Ghana’s capacity building support for CSOs, in that project proposals were generally crisp and well thought out, and activity reports to date have been detailed, clearly setting out achievements as well as challenges.’

Although there are limitations to the above-mentioned studies, in that the EU evaluation only looked at the anti-corruption related projects, these results point to a confirmation of the integration of our strategies.

All the key programmatic strategies have been reviewed either through an internal or external process to ensure they continue to be fit for purpose and to recalibrate them in line with the requirements of the STAR Ghana Foundation going forward.

3 Cs & L Approach

The 3Cs and L approach continues to be the flagship strategy for the programme and the Foundation. In 2018, the strategy was tested in a variety of ways and models, with the main aim of

A demonstration of how the 3Cs strategy has been operationalised

Youth Empowerment For Life (YeFL) implements the “You Speak UP”, an initiative to enhance the participation of youth in governance. This project works in five Districts: Saboba, Yendi, Nanumba South, Nanumba North and Sagnerigu Districts.

Through the Youth Parliament, district-based duty bearers are summoned to explain and respond to key developmental challenges (convening). Committee members of the Youth Parliament used these communiques to follow up with duty bearers to ensure that they fulfill their promises (catalyzing). Follow-ups were also made by the leadership of the parliament-minority and majority.

In February 2019, an educational visit to the national parliament led to a discussion between YEFL and the Speaker of Parliament in aligning the various types of youth parliaments that exist in Ghana (coordinating). This led to a joint 3-day workshop held by the Parliament of Ghana, in conjunction with the National Youth Authority, YEFL, STAR Ghana and Westminster Foundation for development on developing a common framework for youth parliaments in Ghana (collaborating).
identifying what works for civil society in Ghana. This led to a high number of 3Cs activities but a low number of follow-ups and issues being addressed. The proposed recommendation of depth rather than breadth was therefore taken seriously with a review of the strategy and its implementation processes.

This recommendation fed into the 2019 Strategic Learning Event and thus the revised 3Cs and L framework document (April 2019). The revised document set out the updated approach, key criteria and the focus areas for the strategy going forward. The revised framework has been implemented over this year under review and has achieved greater results. A focus on being strategic has led to building out of individual events, a series of increasingly significant events and collaborations that give credence to the work of the foundation as an honest broker of spaces. A case in point being the work with parliament and the Youth Empowerment for Life (YEF) group of young parliamentarians. In many instances, these events cut across the continuum of convening, catalysing and coordinating and in many instances, capacity building to achieve a goal that is in line with the programme impact statement.

Opinion of the 3Cs approach from the Independent Reviewers

The Independent Review of the STAR-Ghana programme sought to, among other things, to ‘understand and demonstrate how the different components of STAR-Ghana (clusters, Communities of Practice, etc) complement and reinforce each other to achieve greater results’. This review noted that the 3Cs and L approach is one of the three unique selling points for the Foundation as it provides ‘a unique approach to supporting civil society within the ecosystem’ (OPM, 2019) and recommends three scenarios for the Foundation to implement the approach going forward. These scenarios were:

**Scenario 1:** Where there is a clear focus on a few priority areas then 3Cs+L will be cross-cutting

**Scenario 2:** The Foundation is not bounded by programmatic issues but is flexible enough to consider anything that comes which occupies/concerns citizens. The Foundation is agile, has peripheral vision, is facilitative, anticipatory and futuristic etc. This recognizes the fact that life is unpredictable, and the foundation must not be held up by specific programmes and fail to respond to growing/changing circumstances.

**Scenario 3:** A blend of scenario 2 and 3 which realizes the need for some form of focus during the formative years of the foundation where funds are limited, and the systems under review/establishment are yet to mature.
The review also identified three key strengths of the approach as being recognised by partners as an effective approach to facilitate change processes at both national and local levels, as having worked collaboratively through the cluster approach to coordinate and build on lessons learnt and lastly, used as a tool to break silo mentality among CSOs whilst fostering collaboration.

On the other hand, the review noted the need to spend time in embedding the approach within the programme taking into consideration the grant-heavy programme processes. The consultants recommended in the design of the communications strategy that the Foundation consider the 3Cs as a cross cutting, agile and flexible tool to support programme work.

In the year under review, these recommendations continue to shape the form and method of convenings and its impact. The following provide examples of how these have worked.

The focus of the convenings have included:

a. **Northern Regional Development Forum**: Based on convenings that began in September 2018, in May of 2019, the Northern Ghana Development Forum convened a high level event that brought together the five regional coordinating councils RCCs in Northern Ghana, the Northern Development Authority, the Office of the Vice President, the Northern Development Forum and the Heads of Cooperation (HoC) under the theme, ‘Accelerating the Sustainable Development of Northern Ghana in the Context of Peace and Ghana Beyond’. Issues that came up included investing in the consolidated peace and security architecture for Northern Ghana more strategically, strengthening the agriculture value chains especially supply and demand factors, accelerating education and health care delivery and investing in youth driven businesses. Two synthesis reports for the two audiences have been developed and shared. A five-point agenda for change and development has also been developed to act as the nexus for practical solutions to the challenges facing northern Ghana. There continues to be strong political interest in this process from the HoCs, the five regional ministers, the Northern Development Authorities (NDA) and the office of the vice president. Key meetings have been held to take forward decision points and this will continue in the first half of this current year. STAR Ghana will continue to facilitate the engagements especially between the HoCs and the Regional Ministers.

b. **National Youth Unemployment Convening**: This was the culmination of 10 regional Youth Unemployment Convenings that took place in May 2018 jointly convened by the Programme and Citi FM and Ghana Think! It followed from the February 2019 visit of the YEFL Youth Parliament to the Parliament of Ghana which was facilitated by the Programme. It led into a convening hosted by the speaker of parliament, in conjunction with the National Youth Authority, the Westminster Foundation for Development and STAR Ghana Foundation to develop a common framework for implementing youth parliaments across the country.

c. **Health**: There were 10 regional convenings, engaging 900 persons directly and more than 600,000 indirectly. The key challenges identified across the regions related to the implementation of the National Health Insurance Scheme (NHIS) and the non-adherence to the Disability Act in respect of health care for PWDs. These issues will form the discussions for a national health summit. As a result of an earlier convening on the Medium-term Health Sector Development Plan (MTHSDP), the programme and its partners were contacted by the Ministry of Health (MoH) for further inputs into the final policy.

d. **Education**: 10 Regional convenings and a TV3-led town hall discussion were held on the Free Senior High School (SHS) policy and a convening in Tamale, in partnership with the Ministry of Education (MoE) on poor learning outcomes in the three northern regions.

As a result of this partnership, the MoE approached STAR-Ghana to co-convene a stakeholder assessment of the free SHS concept one year into its implementation. The convenings also influenced the Parliamentary Select committee on Education to focus on the free SHS during their oversight tours in Central and Western Regions.
e. Civil society sustainability: In partnership with WACSI, STAR Ghana organised zonal convenings on civil society sustainability. The follow-up to these convenings is the implementation of a project, funded by STAR Ghana and implemented by WACSI, to support 24 CSOs develop and implement sustainability strategies. The civil society sustainability strategy document has been published and has received worldwide interest from international donors such as Comic Relief.

Key lessons learned from the implementation of the approach include:

- The importance of political economy analysis (PEA) in the selection of issues for convening and the participants who are involved in the conversations. STAR-Ghana’s embedded PEA approach has been used consciously in the identification of areas around which to develop Calls and in the framing of learning events. A more conscious use of PEA in the implementation of the 3C&L approach has led not only to the identification of issues around which stakeholders may gain traction but also in the development of strategies that enhance the effectiveness of actions embarked upon in the catalysing and coordinating stages. In the case of the national Youth Unemployment Convening and the Northern Ghana Development Summit, the use of a broad-based planning committee and technical experts supported in-depth planning, ensuring that all background analysis, planning and preparation were done exhaustively. It also ensured greater buy-in by partners at the beginning and supported a more sustainable approach to the issues.

- The need to consciously work at linking the four components. The approach has four interlinked components: convening, catalysing, coordinating and learning. The experience at both programme and partner levels has been to focus almost exclusively on the convenings and even when actions arise out of the convenings, they tend not to be highlighted as much. Given that the logic of the approach depends on the linkages between the components, the PMT and GPs will have to consciously focus on indicating the interlinkages even at the concept or planning stages of any intervention.

- Convenings are not one-off events. It is important for the convenings to be planned and implemented as a series which feed into or feed off each other, given the complexities of the policy advocacy process. One-off convenings leading to catalysing of actions and other steps may miss further consultations or dialogues and therefore compromise the effectiveness of the action(s).
COMMUNICATIONS

Increased visibility, brand and positioning

Strong, clear, and consistent branding and positioning is fundamental to STAR Ghana Foundation’s success, as it fully transitions to an Independent Ghanaian-led organisation. A clear identity has been established as a Ghanaian-owned and led national centre for active citizenship philanthropy. This includes a new name, logo, identity, messaging and Branding and Positioning Strategy. We continue to receive significant amounts and depths of coverage across traditional, online and social media channels. We actively engage the media, seeking partnerships with media organisations and houses and tapping into existing relationships among grant partners. These relationships enable the STAR Ghana Foundation to position itself as a credible and reliable organisation that the media and other civil society organisations can call on for comment on key developmental and or social issues.

Transition communications

After a successful launch and a year of solid strategic communications, the Foundation has already made significant progress in communicating its transition to key audience groups highlighted in the transition strategy, including grant partners, wider civil society and NGOs, government and development partners.

Two Frequently Asked Questions documents (internal and external) were developed to clarify and answer key pertinent issues on the Foundation. The Branding and Positioning, and Digital strategies for the Foundation are continuing to evolve and be updated to respond to the changing context and enable them to remain living and relevant guiding documents.

STAR Ghana Foundation already has strong brand awareness among our key audience groups. The Foundation has received three awards which are in recognition of the Foundation's positioning as a centre for active citizenship and philanthropy. For example the Institute of Directors-Ghana’s award is in recognition of STAR Ghana Foundation’s outstanding contribution to socio-economic development of Ghana in providing strategic support for private sector growth; the Ghana Disability Excellence Awards for the Foundations ‘outstanding effort in providing inclusive education and training for persons with disability in Ghana’; and the National Research & Innovation Excellence Awards for ‘funding strategic research projects; for supporting the dissemination and utilisation of research findings in national discourse and policy planning’.

We identified the need for targeted, customised communications for some audiences. An example was the regional launch events, which helped dispel the notion that the Foundation will be an Accra-based and focused organisation.

Strategic communications

Improved strategic communications through the development of bespoke communications products and materials have highlighted programme and partner results as well as lessons learnt. Effective communication on programme and partner results and achievements have been enhanced through the development of communications products including infographic communication materials, teasers on social media, thematic one-pagers and a Foundation brochure.

Short videos (interviews and animation) were also used to tell the story of the STAR-Ghana journey and its achievements and were promoted on social and traditional media. The launch of the Foundation has further positioned STAR-Ghana as a credible partner for national development which provides support to partners and plays an effective 3CL role in addressing local and national salient issues.
Social media performance

Our reach across all social channels was 15,395,417. (Social media reach is an estimated number of users that could have seen our social content, for example a post, page, view, share, or other interaction. It is based on the number of followers / fans / subscribers / connections and visibility percentage.)

Video was a key engagement tool for social media during this period. We had a total of 107 video posts – 65 videos were produced, the majority of which were live event broadcasts. Allowing us to reach a wider and more geographically diverse audience with our live events. The videos were viewed 79,804 times, with 65,022 of these views via Facebook.

Our Twitter posts generated 470,870 impressions, engaged 4,295 people, with a total of 1,798 new followers. On Facebook, we had 952,503 engagements (for example likes, shares, comments, watches); 14,924,547 post impressions; and 2,642 new followers.

A particularly effective social campaign took place around the ‘Northern Ghana Beyond Aid Conference’, which generated 2,151 engagements on Facebook e.g. likes and comments. 78 New followers were recorded during the conference and 4,630 video views (Facebook Live) of the event. The event was among the most talked about issues on Twitter among Ghanaians, trending at number three (3) with the #GhNorthTalksDevpt hashtag.

Social media toolkits have been developed to provide guidance on how to engage on social media. It has played a significant role in the surge in tweets and social media engagements.

Website

The website and digital channels promote relevant information on both the programme and its partners, providing further opportunities for partners to showcase their work, particularly as some of the projects come to an end. During the reporting period 13,584 users visited the website, generating 51,734 page views. 70% of users were from Ghana, 9% from the USA and 5% from the UK. The most popular pages included the homepage (25%), calls for proposals (5%), followed by information about the organisation such as ‘about us’ and ‘our work’.

EMBEDDED PEA (POLITICAL ECONOMY ANALYSIS)

It is clear that political factors are critical in determining the success or failure of the work we are trying to do. However, currently it is not always clear how our understanding of politics (and that of our partners) is evolving over time and informing our strategies. For this reason, the programme is working to improve its political analysis as the basis for action, by using what we call the ‘embedded approach’ to political economy analysis. The embedded PEA pilots aim to work in greater depth with a limited number of key partners to improve analysis and documentation of the learning that is happening across the programme. It is anticipated that, by developing a deeper, more politically-nuanced story of change, we can improve implementation strategies, achieve better outcomes, and produce reporting that better reflects the knowledge and experience that is being generated by and through the programme. We expect to iterate and improve our methods over time.

The pilot phase of this embedded PEA approach targeted six partners across the calls (YEFL, Norsaac, Netright, CDD, Lead Afrique and Voto mobile). As we work through the pilot phase, we are thinking about how the process works at three levels: partner thinking; partner actions; partner effectiveness. In each case, our objective is to use the existing STAR systems and processes (e.g. quarterly reporting; STAR PMT monitoring visits, etc.) to both facilitate better analysis without adding on PEA as ‘something separate’, as well as to provide inputs for improved documentation.
The emphasis has initially been on the first of these three levels, with the intent to build to action and improved effectiveness: Can we use our existing systems to clarify the way in which partners are thinking about political economy dynamics? Can we adjust our systems and processes to deepen the way in which partners are thinking about political economy dynamics? At this stage of the pilots, there are encouraging signs. Certainly, partners vary in the extent to which they are comfortable with the language of political economy analysis. However, once talking in the concrete terms of their work, partners showed a capacity for this, though in all cases, it still did take a few nudges from facilitators to ensure that we noted and were able to follow up where there was mention of stakeholders, power, or the formal or informal rules of the game.

For some partners, a more formal stakeholder mapping process was a useful addition to the monitoring visit. The exercise provided an opportunity for both STAR and the partners to have a deeper reflection on the stakeholders we engage and assess their power and interest to influence our reform agendas.

Two broader points are also worth making:

Firstly, we expect that these pilots will not only generate improved practice among the six pilot partners, but also inform the refinement of the systems and processes that the Foundation will use in the future, such as the partner learning processes and the internal processes for adaptation and thinking and working politically (TWP). Already, our discussions during the pilots suggest that although the quarterly reporting template provided some sections to reflect on the external factors and stakeholder commitments, these sections are not always being used as we might have hoped in support of analysis, learning and adaptation.

Secondly, while we feel the detail and the content that emerges in the next 3-6 months will be useful in assessing our three levels, key reflections from the exercise also include a number of valuable process lessons regarding how to engage partners in a productive way. It is important that partners see value in using this space beyond just appeasing STAR. The ‘embedded’ nature of the approach is a part of this and the M&E team has worked to build buy-in. Thus far, partners expressed an appreciation for the discussion and space created in the monitoring visit. However, it will be critical to be clear about the link between changes in thinking and the potential for changes in action if we are to maintain this buy-in in the long run. It is, and may even be counterproductive, if partners feel they are being asked to undertake deeper analysis that leads to new conclusions but find themselves unable to act on those conclusions (e.g. due to contractual constraints). Supporting thoughtful use of the virement process or similar on the basis of analytically-grounded strategic thinking (as opposed to, say, administrative necessity) may offer a way forward.
ANNEXURES

ANNEX 1 – SUMMARY OF STAR-GHANA PROGRAMME REPORT (2019)

The STAR-Ghana programme is reaching an estimated five million people. It is strengthening civil society, mobilising citizens, and facilitating constructive dialogue between citizens and duty bearers across the country. It is helping to bring about long fought for policy change and enhance the lives of some of the most marginalised people. It is shaping the national dialogue around anti-corruption, accountability and good governance. With the launch of the STAR Ghana Foundation, a distinct and lasting institution has been established; one which will advance the cause of active citizenship and social justice philanthropy and promote inclusive development through its role as a resource to Ghanaian civil society and an honest broker for all.

This report covers the period October 2018 to September 2019, which is also the STAR-Ghana programme’s fourth and penultimate year of implementation. As it enters its final year, the programme does so based on the significant achievements of this past year and lessons learned which will inform and influence development thinking and practice in Ghana and beyond.

Table 1: Beneficiary reach data (October 2019 – September 2018)

<table>
<thead>
<tr>
<th></th>
<th>GESI</th>
<th>Local Governance</th>
<th>Anti-Corruption</th>
<th>Strategic Opportunity</th>
<th>Convening</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct</td>
<td>26,428</td>
<td>22,748</td>
<td>45,028</td>
<td>12,554</td>
<td>6,254</td>
<td>113,012</td>
</tr>
<tr>
<td>Indirect</td>
<td>92,498</td>
<td>79,618</td>
<td>157,598</td>
<td>43,939</td>
<td>21,889</td>
<td>395,542</td>
</tr>
<tr>
<td>Media</td>
<td>3,661,910</td>
<td>-</td>
<td>1,416,995</td>
<td>-</td>
<td>-</td>
<td>5,078,905</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3,780,836</td>
<td>102,366</td>
<td>1,619,621</td>
<td>56,493</td>
<td>28,143</td>
<td>5,587,459</td>
</tr>
</tbody>
</table>

NB: The media reach refers to reach through STAR-Ghana’s Media grant partners and does not include reach by other GPs through the media.

The programme has mobilised a significant mass of civil society organisations around critical national issues and these actions have gained traction and are manifesting in changes in policy and practice at national and local levels. STAR-Ghana has been recognised as a trusted facilitator and convenor of national conversations, enabling dialogue on issues of sustainable development and inclusion. It has also made good progress in the institutional strengthening of Parliament and civil society, two of the key pillars of good governance and inclusive development.

Key achievements for the reporting period include:

- **Parliament:** After more than five years of sustained STAR-Ghana support, Parliament is implementing reforms that have the potential to transform how the institution works. With programme support since 2012, Parliament has finally established the Scrutiny Office as a mechanism to enhance its effectiveness in reviewing contracts, agreements and bills brought before it for consideration.

- **Policy Influencing:** Since 2011, the programme has provided critical support to diverse stakeholders around the Right to Information Bill. Its passage into law in 2019 is in no small way due to the sustained citizen and civil society actions enabled by the programme. The Affirmative Action bill has finally been sent to Cabinet for consideration, after more than 10 years of being stuck at the Ministry of Gender and Social Protection (MoGCS). Support provided by STAR-Ghana contributed to government’s willingness to work on the Bill and also helped shape the content as it brokered dialogue among the diverse stakeholders, particularly women’s rights organisations (WRO) and the disability movement to iron out differences and mobilise a united front for advocacy. Civil society organisations, particularly women’s rights organisations,
have made significant inputs to the content of the Lands Bill. Partly as a result of their advocacy actions, and quality of evidence presented, the government has had to withdraw the bill to enable wider consultations with stakeholders. STAR Ghana is supporting the WROs under the gender equality and social inclusion (GESI) call. A Legislative Instrument (LI) to give effect to the law on the establishment of the Ministry and the Zongo Fund has been passed by Parliament. The national youth policy is in the final stages of revision based on extensive consultations with stakeholders. This is a requirement for the passage of the LI. The Ministry of Zongo and the National Youth Authority (NYA) are both receiving technical and financial support from STAR-Ghana under the State Actors funding window.

- **The STAR Ghana Foundation:** A self-sustaining civil society support mechanism that is embedded within Ghanaian civil society and with leverage to facilitate coordinated civil society actions has been identified as a critical requirement for a more effective civil society sector, particularly in a Ghana Beyond Aid. Through the programme’s support, in November 2018, the STAR Ghana Foundation was launched as a centre for active citizenship and inclusive development. The Foundation has within the reporting period set up its governance structures and systems for financial, grants and human resource management. In August, the Foundation launched a call for proposals for the 2020 general elections and in May convened a national dialogue on Northern Ghana and sustainable national development. These results are significant given that the Foundation is the first of its kind in the sub-region and were not achieved at the expense of other programme priorities.

- **Support to civil society actions and sustainability:** The programme is currently supporting 87 civil society organisations (CSO) at both national and sub-national levels to implement projects around GESI, anti-corruption and local governance. STAR-Ghana has supported projects which are laying the foundations for transformative change in education and health, for the inclusion of persons living with disability, women’s rights, and for the better functioning of government. Technical capacity strengthening support has been complemented with a Leadership Development Programme (LDP) to nurture the next generation of civil society leaders. Undergirding the sustainability work is the civil society sustainability strategy developed in September 2019 in partnership with the West Africa Civil Society Institute (WACSI) and more than 20 local CSOs. The strategy has been well received nationally and internationally.

A total of 89 projects are being supported through partnerships with 87 CSOs, 2 state actors and 8 units of Parliament. Through these projects, at a conservative estimate, over the past year, the programme directly engaged 113,000 citizens to undertake action. In all, nearly 400,000 citizens benefitted directly and indirectly from the programme’s work. Apart from its direct grant support, STAR-Ghana has played a significant role in seeking to coordinate the efforts of different actors, to help build consensus and enhance impact. The programme’s 3Cs & L approach has seen an increasingly strategic focus on a few critical issues. Through its support to Northern Ghana Development Summit it has been at the forefront of the high-level government and donor engagement on development for Northern Ghana. Furthermore, STAR-Ghana is helping to shape the national dialogue. Through its media work, the programme has reached an estimated five million Ghanaians, with messages on democracy, accountability, active citizenship and inclusion.

In an Independent Review of the STAR-Ghana programme commissioned by DFID, the evaluators stated: “The implementation of the STAR programme produced flagship projects in the sense of achieving well recognized outcomes and impacts, Ultimately, there were significant improvements in policy and practice, addressing vulnerability, improving services, engagement of citizens in local governance; and tackling corruption.” Whilst also stating: “more needs to happen in aggregating the local successes into a force for change as in joining the dots for synergy at both the local and national levels.”

The burn rate on the grants budget has improved significantly since the last reporting period. At 82% of implementation, the burn rate stands at 76%. The improvement has been achieved through a combination of strategies, including the frontloading of funding for grant partners with low risk profiles, complementing project implementation with convenings and brokering relationships between grant partners and relevant stakeholders such as Parliament, District assemblies and the media.
Improvements in the burn rate have not been even across all funding windows. It is highest with the competitive funding window targeting CSOs at 82.3% and lowest with the Parliament funding window at 23.1%. The low burn rate for the Parliament window is attributable to a number of factors, including the busy parliamentary calendar which makes planning oversight visits very difficult when Parliament is in session and very expensive when it is on recess. The high turnover in the leadership of the parliamentary committees STAR-Ghana is supporting, has affected implementation of planned activities; as have the delays in the revision of Parliament’s Standing Orders to permit committees to proactively take up issues raised by citizens instead of waiting for the issue to be referred by the House for action by a committee. The Programme Management Team (PMT) has re-allocated GHS1,800,000 of the Parliament budget to support the implementation of activities under the 3Cs and L framework. This has increased the current spend to 35% of the revised Parliament budget.

Key learnings over the past year include the understanding that addressing systemic changes in society whether they be cultural, economic or political is a complex process that requires investment of resources beyond short-term interventions and connecting actors within identified spaces to create synergies for joined up work. However, the process of relationship-building and negotiating alliances must be carefully navigated. Also, that advocacy actions require sustained long-term engagements within which should be space for an iterative process that enables flexibility to accommodate change such as in the campaign for the passage of the Affirmative Action Bill.

Over the final year of the programme, there will be a consolidation of learning and a focus on the unique selling points highlighted by the Independent Review, whilst the Foundation continues to build its profile and capability, and as it moves towards full autonomy.
## ANNEX 2 - FUNDRAISING PIPELINE

<table>
<thead>
<tr>
<th>Proposal</th>
<th>Donor</th>
<th>Summary</th>
<th>Submission Deadline</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access to Rights And Redress in the Informal Sector (ARRIS)</td>
<td>European Union (£1,083,250)</td>
<td>Concept focuses on working with the TUC (GAWU) and Assoc of Ghana Industries (Construction sector) to develop and implement multi-stakeholder mechanisms to improve access to rights and redress mechanisms for workers in the informal sector. It will focus specifically on the agricultural and construction sectors.</td>
<td>January 23rd for submission of Concept Not</td>
<td>The foundation is being supported by SD Direct, one of the consortium partners, to develop the concept note.</td>
</tr>
<tr>
<td>Power of Voices Project Lead – Wild Ganzen; a Dutch NGO</td>
<td>Netherlands Government (20 million Euros) (5 years)</td>
<td>Its aim is to strengthen civil society organisations so that they are capable of lobbying and advocacy in the interests of achieving all the SDGs and a more inclusive and sustainable society. building community level philanthropy in local countries and advocacy for the increase of civic space</td>
<td>31st March, 2020</td>
<td>This is a 10-country project coordinated by a lead partner in the Netherlands. The Foundation will be the implementing partner in Ghana.</td>
</tr>
<tr>
<td>Good Governance</td>
<td>OSIWA (Open Society Initiative for West Africa)</td>
<td>Its aim is to support the creation of open societies in West Africa marked by functioning democracy, good governance, the rule of law, basic freedoms, and widespread civic participation.</td>
<td>30th April, 2020</td>
<td>The Foundation seeks to focus on thematic areas that align with its past experience and core competence for this project.</td>
</tr>
<tr>
<td>GDS Giving</td>
<td>Anonymous Trust</td>
<td>The Management Committee of the Trust has requested for the Foundation’s Strategic Plan in order to its recommendation. This is yet to be done.</td>
<td>No calls for proposals; applications by invitation only.</td>
<td>7 areas of support: - 25% natural disasters - 15% man-made disasters - 15% on poverty eradication; - 10% on old people - 10% on marginalised groups - 15% on vertical education 10% on medical research</td>
</tr>
<tr>
<td>Research on Local Philanthropy</td>
<td>Global Fund for Community Foundations (GFCF)</td>
<td>They support Foundations to conduct research on local philanthropy.</td>
<td>Open</td>
<td></td>
</tr>
<tr>
<td>Program</td>
<td>Funding</td>
<td>Description</td>
<td>Status</td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>----------------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>-------------------------------</td>
<td></td>
</tr>
<tr>
<td>Research on Local Philanthropy</td>
<td>Charities Aid Foundation+</td>
<td>They provide technical expertise to Foundations to conduct research on local philanthropy</td>
<td>Open</td>
<td></td>
</tr>
<tr>
<td>Building Research and Innovation for Development, Generating Evidence, and Training (BRIDGE-Train)</td>
<td>USAID $10,000,000 5 years</td>
<td>The project is on linking academics to communities. Partnering with Ashesi University and MIT, USA</td>
<td>Concept notes submitted</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Submitted our Expression of Interest</td>
<td></td>
</tr>
<tr>
<td>DFID Accountable Grant</td>
<td>DFID (GBP2.2m) for 1.5 years</td>
<td>Focus areas will take account of the Foundation’s experiences and niche. Will also take account of DFID’s feedback on current areas of donor interest.</td>
<td>The secretariat is developing a concept note for review by the Programme Quality committee of the GC. Based on feedback, the concept note will be developed into a costed proposal for submission to DFID</td>
<td>Subject to the foundation passing the DFID due diligence assessment and approval of the proposal.</td>
</tr>
</tbody>
</table>
## ANNEX 3 - STAR-GHANA FOUNDATION LIST OF IMPLEMENTING PARTNERS

| 1 | SYPPA - Ashaiman GAR |
|   | Title: Ashaiman Community Actions Against Violence in Elections 2020” (Ash-CAAVE 2020); Mobilise and empower community members/groups in Ashaiman to contribute in creating a conducive environment for peace, community cohesion before and after Ghana’s 2020 Presidential and Parliamentary elections. |

| 2 | BElim Wusa Dev’t Agency (BEWDA) - UER |
|   | Title: Sustaining the current peaceful environment in the Bawku Traditional Area. |

| 3 | AHAFO NETWORK OF NGOs - Tim Africa Ghana, Tepa Ahafo |
|   | Title: Managing Election 2020- Related Violence For Democratic Stability in Bono and Ahafo Regions. Objectives: To discourage and reduce election related violence in four selected districts in Bono and Ahafo region through community dialogue and conflict resolution by end of project |

| 4 | CALID/ League of Youth Coalition - Tamale |
|   | Title: Vigilant Citizens for Peaceful Election 2020 (VIGILANT 4 ELECTION 2020). Objectives: Nefarious and Violent activities of political party ‘vigilante’ groups minimized in Election 2020 in the proposed project districts. |

| 5 | Socioserve-Ghana/ Echoes Youth Foundation Ghana/ Radio Afram Plains Coalition, Akosombo ER |
|   | Title: Promoting Inclusion of Hard-To-Reach and Island Communities in Election 2020. Objectives: 1. To increase participation of hard-to-reach and Island communities in the 2020 general elections in a transparent, fair and peaceful manner 2. To ensure that development priorities and issues of hard-to-reach and Island communities are captured in the development agenda of Aspirants and District Assemblies |

| 6 | Presbyterian Community Based Rehabilitation Programme, Garu - UE |
|   | Title: Increasing the participation of persons with disabilities and other marginalized groups in Ghana’s election 2020. Objective; Achieve an inclusive and participatory presidential and parliamentary elections in 6 political Districts in Northern Ghana in 2020. |

| 7 | Coalition for Inclusive 2020 General Election - Voice Ghana Ho VR |
|   | Title: Inclusive 2020 Election for All Objective; To increase the participation of women, youth, persons with disabilities, pregnant women, nursing mothers and the aged, in the 2020 general elections in the Volta, Oti and Eastern Regions. |

<p>| 8 | Friends of the Nation (FON) - WR |
|   | Title; Promoting issue-based campaign on Fisheries, Mining and Oil &amp; Gas Governance for Election 2020. Objectives; To increase the capacity of citizens’ groups to influence political manifests by providing credible solutions that addresses key challenges in the fisheries, artisanal and small scale mining and oil &amp; gas sectors. |</p>
<table>
<thead>
<tr>
<th></th>
<th>Title</th>
<th>Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>VEReF &amp; Partners in Democratic Governance - Peki</td>
<td>Title: Combating Vigilantism for Peaceful and Inclusive Participation in Election 2020. Objective: Combating vigilantism and enhancing active participation of marginalised women, youth and PwDs in the electoral process of Election 2020 in the Oti Region.</td>
</tr>
<tr>
<td>10</td>
<td>Blogging Ghana</td>
<td>Title: Ghana Decides 3.0: The YOUTH VOICES Campaign. Objectives; Is for the state and political parties to formulate policies that comprehensively address challenges of the youth including issues such as mental healthcare, protection from predatory actors especially online and substance abuse, and to increase the participation of youth in the political process.</td>
</tr>
<tr>
<td>11</td>
<td>GFD and Penplusbyte - Accra</td>
<td>Title: My Right, My Vote – Tech Enabled Inclusive Ghana Elections. Objectives: Full Inclusion and effective participation of PWDs in Ghana Elections 2020</td>
</tr>
<tr>
<td>12</td>
<td>Private Entreprise Federation - Accra</td>
<td>Title: Enhancing the Participation of Private Sector and Citizens at the District Level in the Pre and Post-Election Activities of the 2020 Elections in Ghana. Objective; To enhance the participation of private sector and citizenry in pre and post-election activities.</td>
</tr>
<tr>
<td>13</td>
<td>Ghana Integrity Initiative (GII) and Ghana Anti-Corruption Coalition (GACC) – Accra</td>
<td>Title: Making All Voices Count in the 2020 Anti-Corruption Agenda of Political Parties' Manifestoes</td>
</tr>
<tr>
<td>14</td>
<td>NORSAAC – NR</td>
<td>Title: Decent Elections 2020 Objectives; To contribute to increased effectiveness of citizens’ actions for credible, peaceful and inclusive presidential and parliamentary elections 2020.</td>
</tr>
<tr>
<td>15</td>
<td>Integrated Social Development Centre (ISODEC) – GAR</td>
<td>Title: Youth Vigilant for Peaceful Elections and Development (Y-VPED) project. Objective; To ensure the 2020 elections in Ghana, especially northern Ghana are violence free, inclusive, credible, fair and is a vehicle for development.</td>
</tr>
<tr>
<td>16</td>
<td>Christian Council of Ghana – GAR</td>
<td>Title: Promoting Peaceful Elections in Ghana (PPEG 2020). The overall aim of the project is to Contribute to the promotion of free, fair, credible and inclusive Presidential and Parliamentary election, accepted by all parties in 2020. That would consolidate the gains made over the years towards Peace and national cohesion.</td>
</tr>
<tr>
<td>17</td>
<td>Forum for Actions on Inclusion, Transparency and Harmony (FAITH) in Ghana Alliance – Accra</td>
<td>Title: Educating, Training and Healing Individuals, Communities and Society (ETHICS) Against Vigilantism in Ghana’s Elections. - (FAITH ETHICS Against Vigilantism in Ghana’s Elections)</td>
</tr>
<tr>
<td>18</td>
<td>Coalition for Peaceful Elections and Development (COPED) - WANEP – Tamale</td>
<td>Title: Youth and Media Skills for Peaceful 2020 Election Project (YAMS4PEACE PROJECT). Objectives; To contribute to a reduction of elections-related violence in 2020 in Ghana.</td>
</tr>
<tr>
<td>No.</td>
<td>Partner/Institution</td>
<td>Title</td>
</tr>
<tr>
<td>-----</td>
<td>--------------------</td>
<td>-------</td>
</tr>
<tr>
<td>19</td>
<td>Abantu</td>
<td>Strengthening Women’s Capacities for Effective Participation in Elections 2020</td>
</tr>
<tr>
<td>20</td>
<td>Partnership for Credible and Inclusive 2020 Elections (PACI) - GDCA – NR</td>
<td>The People’s Choice Project (PCP)</td>
</tr>
<tr>
<td>21</td>
<td>Ghana Journalist Association -Accra</td>
<td>The Case of Political Vigilantism and Electoral Violence</td>
</tr>
<tr>
<td>22</td>
<td>Media General Ltd</td>
<td>Elections 2020: Wielding the Media as a Tool to Promote Issue-Based Campaign</td>
</tr>
<tr>
<td>23</td>
<td>The Multimedia Group</td>
<td>The Ballot Box</td>
</tr>
<tr>
<td>24</td>
<td>Media Foundation for West Africa</td>
<td>Promoting Decent Language and Issue-based Campaigning for Peaceful Elections in Ghana</td>
</tr>
<tr>
<td>26</td>
<td>Centre for Democratic Development Ghana (CDD Ghana)</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>The Light Foundation - Accra</td>
<td>Religious Leaders Action and Support for Election 2020 (RASE 2020)</td>
</tr>
<tr>
<td>28</td>
<td>Coalition of Muslim Institutions (COMI) - Muslim Family Counseling Services (MFCS) - AR</td>
<td>Addressing vigilantism and other election-related conflicts in Zongo communities (AVECZOC)</td>
</tr>
</tbody>
</table>
1. Purpose

The purpose of this policy is to set out STAR Ghana Foundation's approach to risk, to define the framework in which staff are expected to operate and to provide guidance on the procedures for:

- identifying risks
- assessing risks
- evaluating action to be taken on risks
- periodic monitoring and assessment of risks.

It also sets out the Risk Register, which will be updated half-yearly by the Executive Director and approved by the Governing Council (GC).

2. Policy

a- STAR Ghana Foundation will adopt best practice in the identification, evaluation and control of risk to ensure that risks are avoided, mitigated or accepted.

b- STAR Ghana Foundation will embed a full and effective consideration of risk in planning and managing both new and existing activities throughout the organisation.

c- SGF is not prepared to take risks which cannot be controlled or mitigated that may result in serious harm to staff, projects, its financial position or reputation.

3. Definitions

Risk

Risk is the uncertainty surrounding events and their outcomes that may have a significant effect, either enhancing or inhibiting:

- operational performance
- achievement of aims and objectives
- organisational reputation
- meeting the expectations of stakeholders.

Likelihood

Likelihood is the risk of harm occurring.

In the matrix below, Likelihood is rated on a scale of 1 to 5 as follows:

1- Highly Unlikely  2- Unlikely  3- Likely  4- Highly Likely

Impact

Impact is the effect on SGF if harm occurs.

In the matrix below, the impact is coded as follows:

Red: Catastrophic  Yellow: Moderate  Green: Minor  Blue: Insignificant

Risk owners

Risk owners are the individuals identified as having responsibility for the management, control, monitoring and review of risks in the risk register.

4. Objectives

The risk management objectives of STAR Ghana Foundation are to:

- improve decision-making by integrating an awareness of effective risk management in the culture of the Foundation
• embed risk management within strategic and operational management planning processes
• make the most of opportunities and develop them with the confidence that risks will be managed
• be aware of, anticipate and respond to the changing economic, political, social and legislative climate
• raise awareness of the need for active risk management.

These objectives are achieved by:
• developing and maintaining a risk register which details all significant risks which pose a threat to the Foundation
• assessing both the likelihood of those risks occurring and the likely impact
• taking positive action to manage risks
• monitoring and reviewing the risk register on a regular basis
• actively considering risk when planning new activities.

5. Risk strategies
As part of SGF’s approach to risk management, the strategies to be adopted to manage an identified risk are to tolerate, transfer, treat or terminate it:
• tolerating means that the risk is known to and accepted by SGF as one that cannot be avoided if the activity is to continue
• transferring means that the risk is passed to a third party, for example an outsourcer who will manage it (this does not eliminate the risk but can mitigate it)
• treating means that SGF aims to reduce the likelihood of the risk materialising or to reduce the impact of the risk by the introduction of relevant controls
• terminating means avoiding the activity giving rise to the risk.

6. Roles and responsibilities
Responsibilities for risk management are as follows:

Governing Council
• defining and approving the maximum level of acceptable risk (the risk appetite)
• ensuring that controls and procedures are in place and maintained to manage risk

Finance and Audit Committee
• monitoring the assessment of risks to which SGF is exposed
• ensuring that management is implementing controls to mitigate these risks
• ensuring that the management of risks is kept up to date

Executive Director
• overall responsibility for day to day operational risk management

Senior Management Team (SMT)
• implementing the risk management policy and assigning risk owners
• identifying, managing and reviewing risks on a regular basis, at least every six months
• developing and maintaining the risk register
• encouraging good risk management within their areas of operation
• ensuring that action plans are in place and implemented and that controls are operating effectively to mitigate the risks identified in the risk management process
• reporting to the Governing Council at least every six months on progress against planned actions to address the risks
Risk owners

- ensuring that suitable controls are in place, recorded in the risk register and operating effectively to mitigate identified risks
- monitoring risks on an ongoing basis

All staff

- understanding the nature of risk
- identifying new risks
- actively managing the risks in their areas of operation.

7. Identifying risks

Risks most relevant to SGF should be identified through consultations between key managers and staff who have a detailed knowledge of the way in which SGF operates. Workshops can be used to gather information and generate ideas.

The following should be considered as part of this process:

- SGF’s objectives, mission and strategy
- the nature and scale of activities
- the outcomes to be achieved
- external factors such as legislation and regulation
- SGF’s reputation with major funders and supporters
- comparison with other NGOs working in the same sector and of a similar size.

8. Assessing risks

Risks identified should be analysed and categorised in terms of both their impact and the likelihood of their occurrence. This helps to prioritise them and establish what, if any, further action is required.

The risk appetite adopted by the Governing Council is shown in the risk matrix (or “heat map”) below. It uses scores to categorise different levels of risk according to impact and likelihood of occurrence and should form the basis for assessing risk.

<table>
<thead>
<tr>
<th>Risk matrix</th>
<th>Likelihood</th>
<th>Remote</th>
<th>Unlikely</th>
<th>Possible</th>
<th>Likely</th>
<th>Highly likely</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact</td>
<td>Score</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Catastrophic</td>
<td>5</td>
<td>10</td>
<td>15</td>
<td>20</td>
<td>25</td>
<td>30</td>
</tr>
<tr>
<td>Major</td>
<td>4</td>
<td>8</td>
<td>12</td>
<td>16</td>
<td>20</td>
<td>24</td>
</tr>
<tr>
<td>Moderate</td>
<td>3</td>
<td>6</td>
<td>9</td>
<td>12</td>
<td>15</td>
<td>18</td>
</tr>
<tr>
<td>Minor</td>
<td>2</td>
<td>4</td>
<td>6</td>
<td>8</td>
<td>10</td>
<td>12</td>
</tr>
<tr>
<td>Insignificant</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
</tr>
</tbody>
</table>

- Activities highlighted in yellow, green or blue on the risk grid are considered acceptable.
- Activities considered marginal (highlighted in amber on the grid) can be undertaken only after detailed scrutiny and with the approval of the SMT.
- SGF will not undertake any activities which would have a major impact and are highly likely to occur after mitigation measures have been taken.
- SGF will not undertake any activities which would have a catastrophic impact on the organisation unless the likelihood of occurrence is considered to be remote after mitigation measures have been taken.
9. Evaluating action to be taken

Where major risks are identified, the SMT will need to ensure that appropriate action is taken to manage them. There should also be an assessment of how effective existing controls are.

A plan must then be drawn up to include steps to be taken to address or mitigate significant risks so that the gross level of risk is reduced to a net risk that is considered to be acceptable.

The results of this process must be recorded in a risk register.

10. Risk register

The risk register should include the following:
- key risks
- risk category
- the current risk rating (gross risk) based on impact and likelihood
- controls being implemented to bring the level of risk from the current level to the desired level (net risk)
- risk owner
- completion date for mitigation action.

11. Periodic monitoring and assessment

The risk management process must ensure that:
- new risks are reported and evaluated
- risk aspects of significant new projects are considered as part of project appraisals
- any significant failures of control systems are reported and actioned
- learning is captured and documented to ensure that successes and failures inform future risk management
- there is an adequate level of understanding of individual responsibilities for both implementation and monitoring of control systems
- any further actions required are identified
- the SMT reviews the risk register at least every six months to ensure that risks identified are being managed effectively
- the Governing Council is provided with progress reports at least every six months.

12. Training and awareness

Training on this policy should form part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to the policy.

The objectives of the training are to:
- provide staff with an understanding of SGF’s approach to risk and of their responsibilities
- develop skills for identifying, assessing and managing risk.

13. Policy review

This policy will be reviewed every two years.
ANNEX 5 - STAR GHANA FOUNDATION SAFEGUARDING POLICIES

BACKGROUND AND RATIONALE

The STAR Ghana Foundation

The STAR Ghana Foundation was established in November 2018 as Ghanaian-owned and led centre for active citizenship, civil society and philanthropy. It builds on the work of the donor-funded STAR-Ghana Programme which gained national recognition as a high-performing donor grant-making facility. Since 2011, the Programme has worked to advance transformative and inclusive social change by strengthening civil society, accountability and active citizenship.

The Foundation’s vision is to see a well-informed and active Ghanaian citizenry able to contribute to transformational change that advances democracy, accountability and social inclusion. The Foundation aims to increase the effectiveness of citizens and civil society to achieve an equitable, inclusive society by convening inclusive dialogue and collaboration; catalysing active citizenship and collective action; coordinating and supporting strategic partnerships; and facilitating continuous learning to fuel wider scale change. This commitment to convening, catalysing, coordinating and learning – the 3C&L approach – is central to the Foundation’s work. This, plus the Foundation’s commitment to putting gender equality and social inclusion (GESI) at the heart of all activities, is what elevates the Foundation’s mission and purpose beyond that of a traditional grant-maker.

Purpose of the safeguarding policy

The STAR Ghana Foundation’s Safeguarding Policy sets out measures to prevent and respond to instances of abuse and harm that might be occurring as a result of the Foundation’s work. It includes common rules, regulations and principles, and a strategy for ensuring these commitments are meaningfully applied. The policy has been developed in line with DFID’s definition of safeguarding, which states that “safeguarding shapes the organisation’s approach, practice and culture to ensuring a comprehensively safe environment for all people with whom the organisation engages”, and is informed by relevant international and national policies, legislation and best practice approaches (see section 2.2. on Underlying Principles).

Scope of the policy

This Safeguarding Policy is intended to inform all Foundation activities, and the actions and behaviour of all associated with the Foundation – including staff, partners, representatives, beneficiaries, third parties and the communities the Foundation engages. As such, the key audiences (or, indeed, ‘owners’) for this strategy are the Foundation’s Governing Council, management, secretariat, staff, and the Foundation’s partners and representatives. It is the collective responsibility of these stakeholders to put the strategy into practice – as an active document, to prevent and report on any physical, economic, sexual, emotional abuse or neglect of any actor within the Foundation’s community engagement. All those that are engaged, commissioned or contracted to work with or on behalf of the Foundation will need to have a clear understanding of the required standards set out in this policy, and what to do if they have any concerns.

This policy should be read alongside other organisational documents and polices including the:
- Code of Conduct
- Fraud and Misuse of Funds Policy
- Human Resource Handbook
- Disciplinary procedures, including in relation to bullying and harassment

1 The STAR-Ghana Programme’s core donors are the UK Department for International Development (DFID), the European Union and Danida (Danish Development Cooperation). Since 2015, STAR-Ghana has been managed by a Ghanaian-led Steering Committee and Programme Management Team in partnership with an international consortium led by Christian Aid with Social Development Direct, Humentum, the Overseas Development Institute, and Nkum Associates.
SAFEGUARDING COMMITMENTS AND STANDARDS

Policy statement

The STAR Ghana Foundation is committed to delivering on its duty of care towards all those it encounters as a result of its work, regardless of their gender, age, race, ethnicity, spatial location, class, sexuality or ability. The Foundation will take measures to protect the rights of its constituents, including beneficiaries, communities, staff and all other associates, including third parties. The Foundation will not tolerate any form of abuse, and/or violations, and will take necessary actions, as required within this policy, to respond quickly and appropriately to all reports of abuse, and/or violations against any person working for or representing the Foundation.

The Foundation’s commitment to safeguarding is in line with its GESI strategy, which aims to safely and meaningfully engage individuals and groups from diverse backgrounds and of varying identities. This is critical to achieving the Foundation’s vision to see a well-informed and active Ghanaian citizenry able to contribute to transformational change that advances democracy, accountability and social inclusion. The Foundation will have a zero-tolerance approach to all forms of physical, sexual, social and verbal/emotional violence and abuse, including bullying and harassment, and to all actions resulting in or contributing to the violation or denial of the rights of any individual or group.

Underlying principles

The Foundation has agreed on a set of principles that underpin safeguarding. These have been drawn from key international, regional and national instruments such as the International Standards for Keeping Children Safe, the UN Convention on the Rights of the Child, the Core Humanitarian Standards, the UN Convention on the Rights of Persons with Disabilities, the Convention on the Elimination of all forms of Discrimination Against Women, and the African Charter on the Rights and Welfare of the Child (2005); and national policy and legislation, including the Children’s Act (1998), Human Trafficking Act (2005), Persons with Disabilities Act (2006), Domestic Violence Act (2007), Mental Health Act (2012), Child and Family Welfare Policy (2014), National Gender Policy (2015), National Social Protection Policy (2015). It also draws on and is aligned with the STAR-Ghana Social Inclusion Toolkit (2018). The principles are set out below:

Ensuring all individuals are treated equally regardless of their background and identity

Ensuring everyone is aware of the Safeguarding Policy and has responsibility for safeguarding, including the governing council, staff, volunteers, consultants, contractors, third parties and partners of the Foundation

Ensuring concerns or allegations shall be taken seriously, investigated and acted on as appropriate

Ensuring that our feedback mechanisms and reporting channels are clear, transparent and accessible to all

Ensuring all actions and activities are taken in the best interests of the child/adult at risk

Ensuring that survivors of abuse are supported, and alleged perpetrators are held to account

Ensuring that recruitment practices are robust enough to stop the recruitment of anyone who poses a known risk

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2 This vision is in line with key national policies and legislation, including Article 17 of the 1992 Constitution of Ghana, which prohibits discrimination on the basis of gender; the 1998 Children’s Act, Section 3 (p. 8); and the 2012 Mental Health Act, p. 23, Chapters 54 and 55.
SAFEGUARDING MEASURES

3.1 Prevention

The Foundation is committed to ensuring a rigorous recruitment process to prevent the recruitment of a person who poses a known risk. This includes:

- A person who has been convicted of, or has received a formal police caution concerning an offence against children or vulnerable adults
- A person who has been convicted of, or has received a formal police caution concerning sexual offences against any individual
- A person who is repeat offender, including offences concerning sexual offences against children and vulnerable adults.
- A person who has been flagged to the Foundation as a safeguarding concern by a former employer or a creditable whistle-blower.

The Foundation is committed to ensuring that all staff and representatives are appointed and supervised in accordance with the STAR Ghana Foundation’s recruitment policy and other relevant policies, which are in line with national labour laws and national and international policies and best practice. This includes:

- Adding questions about safeguarding in job interviews
- Having a written job description for the post that includes a commitment to safeguarding
- Ensuring all new staff complete a self-declaration disclosure
- Obtaining references including one from a most recent employer
- Verifying qualifications where relevant
- Sharing the safeguarding policy including the code of conduct with all new staff
- Ensuring that new staff sign the code of conduct and a signed copy is safely stored for future reference

The Foundation has developed a mandatory Code of Conduct policy that sets out clear expectations of behaviours – inside and outside the workplace. This is designed to ensure the safety of all associated with the Foundation, whether as a staff member, volunteer or governing council member; a partner; third party or a target beneficiary. All staff, volunteers, consultants and contractors will be required to sign the code of conduct and will be provided with training as part of their induction or contracting requirements.

3.2 Awareness and capacity building

The Foundation is committed to providing inductions and training to all staff, governing council, volunteers, contractors, consultants and partners to raise awareness of safeguarding. The Foundation recognises the importance of building the capacity of all those working in or for the Foundation, and an understanding of the safeguarding commitments. It is also important that everyone is aware of the process for raising a concern or a complaint, for the safeguarding policy to be effective and properly implemented. Whistle blowing or the process of escalating concerns is a key element of operationalising the policy. In order to do this, the Foundation will:

- Disseminate relevant Foundation policies, including the Safeguarding Policy and Code of Conduct, to all staff, partners and other associates. Policies will be shared in hard copy and via links to relevant pages on the Foundation website, and discussed in relevant meetings with staff, partners and associates
- Include information about how to raise a safeguarding concern with the Foundation in key public information materials
- Build safeguarding awareness and whistleblowing into all new staff inductions
- Conduct regular internal team trainings and monitoring on safeguarding
- Include information about safeguarding and reporting mechanism in grant agreements and contracts
- Collaborate with relevant institutions to promote a culture of safeguarding across the civil society sector in Ghana
- Create awareness on a reporting and redress mechanism within the Foundation; its availability and working
The Foundation has established expectations with regards to safeguarding and will provide support and capacity building to staff and collaborators to ensure these expectations are met. The Foundation expects its partners to instil a culture of safeguarding in their own organisations. When working with partners, the Foundation will support partner organisations to develop their own safeguarding capacity and ensure that their policies and practices are aligned with the Foundation's code of conduct. This will include putting in place their own organisational safeguarding policies, which is a mandatory requirement for all organisations looking to establish a partnership with the Foundation.

Reporting

The Foundation is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of violence and harassment. Actual, potential or suspected incidents should be reported immediately. The Foundation places a mandatory obligation and responsibility on all staff, volunteers, consultants or contractors to report concerns, allegations and incidents in a confidential manner and with the appropriate people. Under no circumstances should any individual attempt to deal with the problem directly. Failure to report safeguarding concerns is grounds for disciplinary procedures. The Foundation will respond to allegations and suspicions of violence and harassment in accordance with relevant national instruments and laws.

The following channels have been set up and maintained so that safeguarding concerns can be channelled through a clear, accessible and confidential reporting process. A list of contact details for all safeguarding focal persons, and all those who have access to safeguarding concerns, will be kept and updated regularly.

**Reporting via email:**
- Secretariat’s Safeguarding Focal Person email: safeguardingfocalperson@star-ghana.org;
safeguarding@star-ghana.org
- Whistleblowing email: whistleblowing@star-ghana.org
- Chair of the Gender and Social Inclusion Committee email: gsicchair@star-ghana.org
- Third party safeguarding focal person email: safeguardingtrustee@star-ghana.org
The safeguarding email account is only accessible to the safeguarding focal person who has been trained on the requirement to keep information confidential.

**Reporting via phone:**
- Programme Safeguarding Focal Person phone: +233501454477/+233 302774488
- Whistleblowing phone: /+ 233 302774488
- Chair of the Gender and Social Inclusion Committee email: /+ 233 302774488

**Reporting in person:**
- Programme Safeguarding Focal Person
- Chair of the Gender and Social Inclusion Committee
- Third party safeguarding focal person

**Responding**

Allegations concerning Foundation staff, governing council members, volunteers, consultants, contractors or partners will be investigated by the Foundation through its Gender and Social Inclusion Committee. Investigations may also be referred to relevant local or national law enforcement institutions, in addition to relevant national commissions, such as the Commission on Human Rights and Administrative Justice.

Confidentiality must be maintained at all stages when dealing with a safeguarding concern. Information given should be written in a report as soon as possible after the concern is raised (within 24 hours if possible). All information relating to a report or a concern and subsequent case management should be shared on a need to know basis only, and all related information securely stored (in a secure, locked location or a confidential electronic folder).
Third parties shall by availed all mechanisms for reporting and redress as set out in this policy.
### GOVERNANCE AND OVERSIGHT

<table>
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<tr>
<th>Position</th>
<th>Responsibility</th>
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| Gender and Social Inclusion Committee         | Reports to the Governing Council on implementation of safeguarding policy  
Advises Secretariat on policy implementation  
Recommend actions on safeguarding concerns to the Governing Council |
| Executive Director                            | Oversight for staff induction on safeguarding policy and code of conduct  
Ensures staff have signed code of conduct and uphold it  
Ensures associates of STAR Ghana Foundation have endorsed policy and code of conduct  
Reviews safeguarding register regularly and supervises implementation of mitigation strategies  
Files reports on safeguarding register to the Governing Council, GSIC, donors and statutory agencies |
| Foundation Safeguarding Focal Person          | Ensures staff have undergone induction on safeguarding policy and code of conduct  
Ensures staff have signed code of conduct (annually) and uphold it  
Ensures that clear investigation and disciplinary procedures are used when allegations and complaints are made  
Receives all complaints / allegations on safeguarding and leads on case management  
Records cases, and is responsible for updating and managing the safeguarding register  
Reports on a quarterly basis to the management  
Communicates to the programme team around safeguarding concerns  
Monitors and reports on a quarterly basis to the management  
Initiates swift action in collaboration with relevant stakeholders/actors regarding safeguarding concerns |
| All staff, GC members, volunteers, interns, consultants, contractors | Read the safeguarding policy and the code of conduct  
Sign the code of conduct  
Escalate concerns immediately as per this policy (including concerns about their own staff/colleagues). |
| Partners                                      | Read the safeguarding policy and the code of conduct  
Sign the code of conduct  
Provide assurance to develop and implement safeguarding policies  
Develop, implement and monitor their safeguarding policies  
Uphold the safeguarding values  
Endorse policy and code of conduct  
Keep the Foundation informed of any safeguarding issues related to partnership with the Foundation. |

### IMPLEMENTATION AND MONITORING

Annual resigning of the code of conduct by staff/associates  
Review of organizational assessment tools to reflect safeguarding e.g. GESI scans  
Annual review of relevant policies  
Semester training for staff on safeguarding  
Monitor partners’ implementation of their safeguarding policies and code of conduct
Code of Conduct

It is our policy that no-one shall work within the STAR Ghana Foundation who:

Has been convicted of or has received a formal police caution concerning an offence against children, other minors and vulnerable individuals/groups.

Has been convicted of or has received a formal police caution concerning sexual offences against adults; or

- Is notified to us as having a red flag in relation to safeguarding by a former employer, creditable associate/whistle-blower or victim or their guardian.

1. The STAR Ghana Foundation will ensure all workers are appointed, trained, supported and supervised in accordance with relevant guidance on safe recruitment. This includes ensuring:

- There is a written job description/person specification for the post
- Those applying have completed an application form including a self-declaration disclosure in relation to safeguarding
- Those short listed have been interviewed
- Safeguarding has been discussed at interview where the applicant will be working with children, adults and risk or beneficiary communities
- Two references have been obtained including one from the most recent employer
- A Disclosure and Barring checks is completed for specific roles, such as those dealing with children.
- Qualifications where relevant have been verified
- A suitable training programme, including safeguarding is provided for the successful applicant
- The applicant/staff has completed a probationary period
- The applicant/staff has been given a copy of the organisation’s safeguarding policy and knows how to report concerns.
- The successful application signs the STAR Ghana Foundation’s Code of Conduct and performs the training on appointment.

2. Code of Conduct and Responsibilities

All staff, GC members, consultants, partners, volunteers, contractors and representatives [hereafter termed ‘associates’] of the STAR Ghana Foundation must follow the Code of Conduct, including signing the Code as a precursor to their engagement with the Foundation, and on an annual basis thereafter. The following are relevant to safeguarding. As an associate of the STAR Ghana Foundation:

- I will ensure that my personal and professional conduct is, and is seen to be, of the highest standards and in keeping with the STAR Ghana Foundation’s beliefs, values and aims.
- I will treat all people fairly and with respect and dignity and recognise the professional opinion of others.
- I will seek to ensure that my personal conduct does not compromise the STAR Ghana Foundation’s values and does not impact on or undermine my ability to undertake the role for which I am undertaking.
- I will not say or do anything that would damage the reputation of the STAR Ghana Foundation or which may bring the Foundation into disrepute.
- I will not abuse my position as a STAR Ghana Foundation associate by requesting any personal service or favour from others in return for any assistance by the STAR Ghana Foundation.
- I will not enter into commercial sex transactions. For the purpose of this Code of Conduct, a transaction is classed as any exchange of money, goods, services or favours with any other person.
- I will not have sexual relations with beneficiaries, recognising in both cases the inherent unequal power dynamics and that such behaviours can undermine the integrity and credibility of the STAR Ghana Foundation’s work.
- I will not exchange money, offers of employment, employment, goods or services for sex or sexual favours, nor any forms of humiliating, degrading or exploitative behaviour.
- I will not have sexual relations with children (defined as under 18 years old);
• I will ensure that my relationships and behaviour are not exploitative, abusive or corrupt in any way.
• I will respect all peoples’ rights, including children’s rights, persons with disabilities, and will not engage in any form of sexual abuse or exploitation of any persons of any age.
• I will obtain consent from parents, guardians and other relevant interest parties before engaging with children
• If I become aware of any form of illegal activity, relating to the STAR Ghana Foundation, its associates or beneficiaries or where there is a safeguarding risk, I will make it known to safeguarding focal person.
• I will abide by the STAR Ghana Foundation’s Safeguarding Policy and will not engage in inappropriate or sexual behaviour with children under the age of 18.
• I will not abuse or exploit children under the age of 18 in any way and will report any such behaviour of others to my line management.
• I will refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation or exploitation, both in and out of work.
• I will not sexually harass any of my colleagues.

3. Responsibilities in relation to Children and Adults at risk

Associates of the STAR Ghana Foundation must not:
• Hit or otherwise physically assault or physically abuse children or adults at risk
• Develop physical/sexual relationships with children or adults at risk
• Develop relationships with children or adults at risk, which could in any way be deemed exploitative or abusive
• Place themselves in a position where they could be accused of sexually abusing a child, young person or adult at risk, i.e. holding or hugging a child, young person or adult at risk, or physically touching children, young persons or adults at risk in a way that could be considered abusive in ways described in this document
• Spend time alone with children or adults at risk. Plan activities so that more than one person is present or, at least, other people are within sight and hearing. Wherever possible ensure that another adult is present to supervise the activity
• Take children/adults at risk alone in a car, even on short journeys
• Act in ways that may be abusive or may place a child or adult at risk of abuse
• Use language, make suggestions or offer advice which is inappropriate, offensive or abusive
• Offer benefits such as food, favours, clothes, jobs, money in exchange for sexual favours
• Show favouritism to any individual for sexual favours in return.
• Act in ways intended to shame, humiliate, belittle or degrade children or adults at risk, or otherwise perpetrate any form of emotional abuse.

All associates must:
• Treat everyone with respect, recognising their right to personal privacy
• Be aware of situations that may present risks and manage these
• Plan and organise events so that risks are minimised
• Avoid being drawn into inappropriate attention seeking behaviour, such as tantrums or crushes
• If a residential event is being planned, ensure that adults and children have separate sleeping accommodation. Never sleep in the same room or bed as a child or adult at risk with whom they are working
• Remember that someone else may misinterpret your actions, no matter how well intentioned
• Adults should avoid being placed in a compromising or vulnerable position. The adult is always considered responsible even if a child behaves seductively.
• Ensure that adults travelling at the request of the Foundation do so safely, including those with child minders
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