

**GHANA CHRISTIAN  
UNIVERSITY COLLEGE**

**University Miscellaneous  
Policies and Procedures**

# Compliance Policy

## 1. Policy

### 1.1 Intent and Objectives

To ensure GhanaCU's operations are conducted in accordance with legal and internal policy requirements.

1. To ensure that GhanaCU's has the responsibility and commitment to effectively identify and manage its compliance risks and obligations,
2. To develop and foster a compliance culture within the organisation:
  - a. by encouraging proactive and accountable management of GhanaCU's compliance management framework,
  - b. by encouraging ownership of compliance risks and obligations within individual colleges, portfolios, schools and groups,
  - c. by raising and maintaining the level of awareness of GhanaCU's compliance obligations throughout the organisation by providing education programs, guidance and statutory updates,
3. To monitor compliance and implement corrective action where required.

### 1.2 Scope

GhanaCU

### 1.3 Exclusions

None.

### 1.4 Provisions

University operations must comply with all relevant laws, regulations, industry codes, standards or guidelines, as well as internal policies and procedures.

GhanaCU will develop and maintain a compliance management framework.

### **1.5 Roles and Accountabilities:**

All levels of staff within GhanaCU have responsibilities with regard to the development and implementation of a compliance management framework, and the fostering of a compliance culture, within the university.

1. GhanaCU Senate, President and all levels of management should actively demonstrate commitment to designing, developing, implementing, maintaining and improving an effective compliance program.
2. President and Executive Team are responsible for the approval of the compliance management framework, responding to compliance issues raised and fostering a culture of compliance and good corporate citizenship.
3. Audit and Risk Management Committee is responsible for ensuring they receive regular compliance reporting and requesting follow-up actions where necessary.
4. All managers are responsible for the development, implementation and maintenance of an effective compliance management framework, in conjunction with the compliance manager, including compliance monitoring and implementing corrective actions in the event of a breach.
5. All Staff must adhere to compliance obligations, undertaking relevant training and reporting compliance concerns, issues, complaints and breaches.
6. Compliance Manager is responsible for the development, implementation and continuous improvement of a compliance management framework as detailed in the Corporate Compliance Strategy.
7. Outsourcing of any operations does not relieve GhanaCU of its legal responsibilities or compliance obligations.

If there is any outsourcing of contracting out of GhanaCU activities, due diligence is required to ensure that GhanaCU standards and commitment to compliance is not reduced.

### **1.6 Non-Compliance to GhanaCU 's Compliance Obligations:**

Staff who knowingly and recklessly breach compliance obligations may be subject to applicable legislative penalties and/or disciplinary action.

### **1.7 Compliance Breach and Complaints Reporting:**

GhanaCU encourages the proactive reporting of compliance breaches, issues, incidents and complaints.

## **2.0 Definitions**

**2.1 Code** – mandatory and/or voluntary statement of recommended practice developed internally by GhanaCU or by an international, national or industry body or other organisation with which GhanaCU has chosen to comply.

**2.2 Compliance** – adhering to the requirements of laws, industry and organisational standards and codes, principles of good governance and accepted community and ethical standards.

**2.3 Compliance culture** – the values, ethics and beliefs that exist throughout GhanaCU and interact with GhanaCU’s structures and control systems to produce behavioural norms that are conducive to compliance outcomes.”

**2.4 Compliance manager** – the position responsible for the coordination of GhanaCU’s compliance management framework.

**2.5 Compliance management framework** – a mechanism through which GhanaCU can monitor, review and comply with legislation, regulations, statutes, Codes, standards, policies and procedures.

**2.6 Compliance failure or breach** – an act or omission whereby GhanaCU has not met its compliance obligations, processes or behavioural obligations.

**2.7 Responsible officer** – GhanaCU employees who are appointed by senior management to assist in the facilitation and monitoring of compliance within their portfolio/school/group.

**2.8 GhanaCU** – GhanaCU university and its controlled entities.

**2.9 Management** – employees at a management level who are normally the head of a portfolio/school/group and are responsible for the facilitation, monitoring, coordination and communication to employees within their portfolio/school/group on compliance matters.

**2.10 Employee or Staff** – person, whether remunerated or not, working on GhanaCU’s behalf including part time staff, full time staff, sub-contractors, temporary staff and volunteers.

### 3.0 Accountability

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## Grievance Policy

1 In the normal conduct of education at the Ghana Christian University College, grievances may arise with respect to the alleged violation of university, school, or department academic policies or procedures. The University is committed to resolving these grievances in a fair, orderly, and expeditious manner. To that end, the department, school, and university have established procedures beginning at the department level for settling academic grievances involving students.

2 An academic grievance refers to an action taken against a student by a member of the faculty, a part-time instructor, a teaching assistant, or an administrator that allegedly either violates a university, school, or department academic policy or procedure or prejudicially treats the student on the basis of race, color, national origin, religion, sex, age, handicap, veteran status, or any other non-academic status not covered under the university policy with respect to sexual harassment or other relevant university policies.

3. Because assigning a grade or evaluating a student's work performance involves the faculty's professional judgment and is an integral part of the faculty's teaching responsibilities, disagreement with an instructor concerning a grade or evaluation is not a justifiable grievance to be considered under this policy unless factors such as those mentioned above can be shown to have affected that grade or evaluation.

4. The following policy and procedures for students who take courses offered by the University apply to the redress of grievances concerning academic and instructional matters and other issues for which there are no other existing grievance procedures.

4.1 As a first step, the student and the faculty member(s) should make efforts to settle their differences amicably and informally to redress the grievance. The student must request, in writing, a meeting with the faculty member(s) involved **within 30 days** of the point in time when the grievant has knowledge or should have had knowledge of the problem being grieved. This meeting should take place **within 10 working days** from the reception of the student's letter. At the request of the student and/or the faculty member(s), the director of graduate studies can act as a disinterested mediator (assuming

the grievance is not brought against the director of graduate studies, in which case a member of the Executive Committee can serve as mediator).

4.2 In the case that no solution is derived from the meeting between the student and the faculty member(s) involved, the student may request, in writing and **within 10 working days** after the meeting described in (1), to discuss the problem with the chair of the department. (If the chair of the department is involved in the grievance, a member of the Executive Committee can stand in for the chair.) In requesting this meeting, the grievant must state

(a) when he/she discovered the issue being grieved,

(b) what issue is being grieved and provide evidence to support the grievance, and

(c) what is the desired resolution. The conversation between the chair (or member of the Executive committee) and the student will take place **within 10 working days** after the reception of the student's letter. The chair (or member of the Executive Committee) also should solicit a response in writing from the party against whom the grievance was brought with respect to issues raised in the meeting between the chair (or member of the Executive Committee) and the student.

4.3 The chair of the department (or member of the Executive Committee) will respond in writing to the student within **10 working days** after the meeting described in (2). A copy of this letter will be also sent to the faculty member(s) involved.

4.4 If either the student or the faculty member(s) involved is dissatisfied with the outcome of the department-level process, that party may petition the dean of the College of Liberal and Social Sciences, in writing and **within 10 working days** after the reception of the chair's (or the Executive Committee member's) letter, by filing a formal written complaint (See College of Liberal Arts and Social Sciences Graduate/Professional Grievance Policy and Procedure at [www.ghanacu.net](http://www.ghanacu.net)).

# APPEALS POLICY AND PROCEDURE

## 1. Introduction

1.1 It is very important to understand the difference between an appeal and a complaint, as they are treated separately by the University and there are different procedures that students are required to follow in each case. If a student is unsure about whether to lodge an appeal or a complaint, they should seek advice from either the GhanaCU Students' Union or Quality, Assurance & Enhancement (QAE).

1.2 If a student is dissatisfied with the assessment process and/or a decision reached by a formal assessment on their academic work, and/or a decision about them reached through the application of a University policy, procedure or Regulation, they should lodge an appeal following the formal procedure detailed below

## 2 Communication and third-party appeals

2.1 The University's relationship is with the student, irrespective of who pays the student's fees. Therefore, students should note that, under Data Protection legislation, the University cannot deal with third party appeals without the written permission of the student unless a third party has been formally authorised or instructed to act on a student's behalf (this includes appeals made by a student's parent(s) or spouse). Whilst correspondence will then be copied to the student (unless specifically directed To the contrary by the student), the University will only deal with the single individual authorised to act on the student's behalf in respect of an appeal.

2.2 Students are reminded that in line with the provisions of the Data Protection Act, the University has a policy on the confidentiality of information held about individual students, including their assessment results. Therefore, information relating to an appeal cannot be released to a third-party other than when required by law or at the written request of the student.

## 3 Appeal content

3.1 Appeals regarding the decision of an assessment board, Academic Disciplinary Committee, Extenuating Circumstances Panel or other decision-making body as noted within the policies within these General Regulations for Students must include:

- the student's full name, course title and year of study;
- details of the decision for which a review is requested;
- the name of the student's Head of Subject; and



- full details of the grounds for the request including supporting contemporaneous documentary evidence.

If these grounds relate to illness or other extenuating factors, full and valid reasons must be given as to why this information was not made available to the assessment board or other decision-making body before the meeting at which the decision was made, together with appropriate supporting documentary evidence as detailed below.

3.2 It is the responsibility of the student to provide complete and relevant evidence to support his/her case at the time of making the appeal. Further evidence brought forward following the consideration of the appeal will not normally be considered.

3.3 An appeal must be submitted on the correct form and submitted in hard copy and/or via email. However, correspondence regarding an appeal cannot be conducted via email.

3.4 Appeals which do not use the standard form will not normally be considered.

#### **4 Confidentiality**

4.1 In submitting an appeal, a student is conferring authorisation to those involved in the process to have access to relevant information required to make a decision. This may mean that the University will require access to sensitive information (for example, a file held by the Student Support Services).

4.2 Normally an appeal and supporting evidence will only be viewed by the members of the Appeals Screening Panel and, should it be put forward to stage 2 of the process, by the members of the Appeals Review Committee. Should it go forward further for review by the original decision-making body, the members of that body will also view the appeal and any supporting documentation. In certain instances, staff other than these will need sight of all or part of the appeal in order to respond. Students can be reassured that, in such instances, any information disclosed will be treated confidentially. However, if a student has concerns regarding confidentiality, such concerns should be raised in their letter of appeal.

#### **6 Appeals concerning a review of the** Grievances and Appeals Board **decision**

6.1 Examinations and assessments are conducted in accordance with the approved assessment regulations of the course and of the University, and in accordance with the principles and regulations agreed upon by an accrediting body where appropriate. Given this, the decisions of a properly convened and constituted assessment board may not normally be modified by an authority within the University

6.2 The only grounds for requesting the Grievances and Appeals Board to reconvene in order to review its decision are:

- a) that there has been a material error or irregularity in the formal conduct of the assessment or in reaching an academic or other decision; or
- b) that the performance of the candidate was adversely affected by illness or other factors which the candidate was unable or, for valid reasons, unwilling to divulge before the decision concerned was reached. Such a request must be supported by a full medical report or other documentary evidence, with a detailed explanation of why this information had not been divulged prior to the assessment board meeting.

6.3 If students choose not to reveal any medical or other problem prior to the assessments or an assessment board, they will only be able to use this information as the grounds for a subsequent appeal in the most exceptional circumstances.

6.4 If a student's assessment performance is adversely affected by illness or other factors, it is the responsibility of the student to make use of the University's Extenuating Circumstances Policy.

6.5 A student may not request a review of an assessment board decision on the grounds of alleged defective judgement or noncompetence of a properly convened and constituted assessment board (ie a challenge to academic judgement).

6.6 A student cannot appeal against Grievances and Appeals Board decisions made in previous years.

6.7 Students who feel they may have grounds for an appeal should seek impartial help and advice from the Students' Union.

## **7 Timescale for all appeals**

7.1 A request for a review of an assessment board decision must be lodged, in writing on the standard form, with QAE within twenty (20) working days of the publication of the results. Such a request should be accompanied by any supporting material which the student wishes to be considered. A request for a review of the decision of the Academic Disciplinary Committee, Extenuating Circumstances Panel or other decision-making body as noted within the policies in the Student Regulations must be lodged, in writing on the standard form, with QAE within twenty (20) working days of the notification to the student of the outcome from that body. Such a request should be accompanied by any supporting material which the student wishes to be considered.

7.2 Requests received after twenty (20) days of the notification will not normally be considered. Supporting material received after twenty (20) days of the notification will not normally be considered

7.3 The appeals process will normally be completed within 20 weeks following the receipt of an appeal. The University will keep appellants informed as to the progress of their appeal should a decision be delayed beyond the indicated completion date.

## 8 Appeals procedure

### Stage 1

Receipt of a request for a review of a decision by the Grievances and Appeals Board, Academic Disciplinary Committee, Extenuating Circumstances Panel or other decision-making body as noted within the policies in these Student Regulations will be acknowledged within five (5) working days.

All appeals will be viewed by an Appeals Screening Panel which will determine whether there is sufficient credence/evidence for the appeal to progress to the Appeals Review Committee. This will be co-ordinated by the Director of Quality, Assurance & Enhancement (or nominee) and will take place via circulation, normally within ten (10) weeks of receipt of an appeal.

The Appeals Screening Panel will comprise the following:

- a) four senior academic staff
- b) Officer (Quality, Assurance & Enhancement)

If the Appeals Screening Panel determines that a case for the appeal warrants further scrutiny, the appeal shall be referred to the Appeals Review Board, and the appellant will be informed that their appeal is progressing to Stage 2 of this procedure.

If a persuasive case has not been made for the appeal to proceed, the case shall not be referred to the Appeals Review Committee and the appeal will be dismissed. The student will be notified in writing of the reasons for the decision.

### Stage 2

The membership of the Appeals Review Committee shall be confirmed by the Chair of the Academic Senate and shall comprise:

- a) Provost/Vice President (or nominee), who shall act as Chair
- b) Director of Academic Affairs (or nominee)
- c) two senior academic staff
- d) GhanaCU Students' Court Chief Justice or nominee
- e) Director of Quality, Assurance & Enhancement (or nominee) shall act as Secretary.

Members of the Grievances and Appeals Board responsible for a decision that is being considered by the Appeals Review Committee cannot be included in its membership, nor can an individual who has been involved in the Appeals Screening Panel.

The Secretary shall provide the Appeals Review Committee with relevant documents which may include:

- a) the appeal from the student with any supporting documentary evidence;
- b) appropriate and relevant regulations, policies and procedures;
- c) minutes of the relevant decision-making body (if appropriate);
- d) copies of any other written information considered as relevant;
- e) a copy of these procedures.

The Appeals Review Committee's decision in each case shall be either:

- a) that grounds for review have been established, in which case it shall require the Grievances and Appeals Board or other relevant decision-making body to review its decision in the light of those grounds; or
- b) that no grounds for review have been established in which case the application shall be rejected.

The Appeals Review Committee shall normally meet within six (6) weeks of appeals being progressed to Stage 2 of this procedure.

The Secretary shall inform the appellant and the chair of the Grievances and Appeals Board or other relevant decision-making body, in writing, of the Appeals Review Committee's decision (with reasons) within five (5) working days of the meeting.

## **9. Outcomes**

9.1 The Grievances and Appeals Board or any other relevant decision--making body which is required to review its original decision shall normally meet as soon as possible after receipt by the Chair of the instruction to do so and should do so within four (4) weeks of such an instruction. For the Grievances and Appeals Board, this will usually follow the format of a reconvened assessment board in terms of membership. However, the Chair reserves the right to consult external examiner(s) for the course on the situation and the outcome, and will seek their advice where appropriate, although they are not required or expected to attend the Committee.

9.2 The Grievances and Appeals Board or other relevant decision--making body, after reviewing the evidence, shall agree either to amend or to confirm its original decision. This decision is final and concludes the University's internal processes.

9.3 Where the Grievances and Appeals Board or other relevant decision--making body agrees to amend its decision, but is uncertain as to the most appropriate alternative recommendation, it may seek additional evidence of the student's performance, either through re-assessment at the next normal opportunity, through a viva voce examination or through another form of assessment deemed appropriate to the student's circumstances and the requirements of the course of study.

9.4 If, in exceptional circumstances, reconvening the other relevant decision--making body is not possible, the Senate has the ultimate authority.

9.5 The Secretary to the other relevant decision--making body or other relevant decision--making body shall inform the Head of Quality, Assurance & Enhancement of the outcome of the review. The QAE team will notify the appellant and the Vice President in writing, of the decision of the relevant decision--making body within ten (10) working days following the meeting of the relevant decision--making body. A Completion of Procedures letter will be enclosed with the letter to the appellant together with details

of the Office of the Independent Adjudicator (OIA). Students should note that the Office of the Independent Adjudicator (OIA) cannot look at a complaint to the extent that it relates to academic judgment. Students should refer to the 'Glossary' on the OIA website for a fuller explanation of what the OIA considers constitutes academic judgement.

9.6 QAE submits an annual report regarding appeals to the Senate (Academic Board).