

Globetrotters Legal Africa – Compliance Policy

Last Reviewed: January 2025

1. Purpose

This Compliance Policy sets out the standards and procedures to ensure Globetrotters Legal Africa operates in full compliance with applicable immigration laws, legal regulations, ethical standards, and professional obligations. It applies to all lawyers, pupils, interns, consultants, administrative staff, and contractors.

2. Scope

This policy governs all operations and personnel involved in the delivery of immigration and legal services, including but not limited to:

- Client onboarding and verification
- Document preparation and submission
- Legal representation
- Client communication and data handling

3. Compliance Objectives

- Ensure strict adherence to Ghana's immigration laws and regulations
- Maintain client confidentiality and data security in line with applicable data protection laws
- Prevent fraud, misrepresentation, and unethical conduct
- Promote continuous legal education and awareness
- Monitor, detect, and remediate compliance risks

4. Legal and Regulatory Framework

Compliance is required with, but not limited to:

- Ghana Immigration Act, 2000 (Act 573)
- Ghana Data Protection Act, 2012 (Act 843)

- Legal Profession Act, 1960 (Act 32)
- General Data Protection Regulation (GDPR), where applicable
- Guidelines issued by the Ghana Immigration Service,, Petroleum Commission and other relevant authorities

5. Roles and Responsibilities

Role	Responsibilities
Managing Partner / Compliance Officer	- Oversee firm-wide compliance - Conduct regular training - Investigate breaches and report as necessary
Lawyers	- Provide accurate, ethical legal advice - Ensure proper documentation of filings - Supervise non-legal staff
Paralegals / Legal Assistants/ Immigration Consultants	- Follow instructions diligently - Maintain accurate client files - Report irregularities promptly
All Staff	- Uphold ethical standards - Maintain confidentiality - Report concerns to the Compliance Officer

6. Client Onboarding and Verification

- All clients must undergo identity verification to identify issues such as conflict of interest
- Engagements must be formalized with a signed retainer agreement
- Conflict of interest checks must be completed prior to representation

7. File Management and Record-Keeping

- Client files must be accurate, up-to-date, and securely stored
- Digital records must be maintained and only kept for intended purposes only
- Records must be retained for a minimum of seven (6) years in accordance with regulatory standards

8. Confidentiality and Data Protection

- All staff must sign confidentiality agreements
- Client data must not be disclosed without proper authorization
- Compliance with Ghana's Data Protection Act (Act 843), GDPR, and other applicable laws is mandatory

9. Training and Education

- Annual compliance training is mandatory for all personnel
- New hires must complete a compliance orientation
- Updates will be provided on material changes to immigration law or ethical rules

10. Violations and Disciplinary Actions

- Breaches of this policy may result in disciplinary action, including termination
- Serious violations may be reported to regulatory bodies or law enforcement agencies

11. Auditing and Monitoring

- Internal audits will be conducted quarterly
- Random file reviews will be performed to ensure accuracy and compliance
- External audits will be conducted annually by an independent reviewer

12. Policy Review and Updates

- This policy will be reviewed annually or upon significant legal or regulatory changes
- All updates will be communicated across the firm

13. Acknowledgement

All personnel must sign an acknowledgment confirming they have read, understood, and agree to comply with this policy.

Signature of Personnel

Name: _____

Date: _____