



# ARAP Annual Report 2018

28<sup>th</sup> February, 2019

Funded by



Implementing agency



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# List of Acronyms

<b>AIS</b>	Activities Information System
<b>ADR</b>	Alternative Dispute Resolution
<b>ARAP</b>	Accountability, Rule of Law and Anti-corruption Programme
<b>CHRAJ</b>	Commission on Human Rights and Administrative Justice
<b>CU</b>	Coordination Unit
<b>DPD</b>	Directorate of Public Defenders
<b>DPP</b>	Directorate of Public Prosecution (Office of the Attorney General)
<b>EC</b>	European Commission
<b>EG</b>	Environmental Governance
<b>EOCO</b>	Economic and Organised Crime Office
<b>EPA</b>	Environmental Protection Agency
<b>EU</b>	European Union
<b>EUD</b>	European Union Delegation
<b>FIIAPP</b>	International and Ibero-American Foundation for Administration and Public Policies
<b>GSGDA II</b>	Ghana Shared Growth and Development Agenda
<b>GIZ</b>	Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH
<b>GPS</b>	Ghana Police Service

<b>HQ</b>	Headquarters
<b>IMS</b>	Information Management System
<b>IT</b>	Information technology
<b>JS</b>	Judicial service
<b>KE</b>	Key Expert
<b>KRA</b>	Key Result Area
<b>LAC</b>	Legal Aid Commission
<b>LADA</b>	Law and Development Associates
<b>LAS</b>	Legal Aid Scheme
<b>LI</b>	Legislative Instrument
<b>M&amp;E</b>	Monitoring and Evaluation
<b>MONICOM</b>	Monitoring Committee (MONICOM)
<b>NACAP</b>	National Anti-Corruption Action Plan
<b>NACoRD</b>	National Anti-Corruption Reporting Dashboard
<b>NAO</b>	National Authorising Officer
<b>NCCE</b>	National Commission for Civil Education
<b>NKE</b>	Non-key experts
<b>OAG</b>	Office of the Attorney General
<b>PAD</b>	Public Affairs Directorate
<b>PIAC</b>	Public Interest Accountability Committee
<b>PPSB</b>	Police Professional and Standards Bureau
<b>PRCU</b>	Public Relations and Complaints Unit
<b>STAR-Ghana</b>	Strengthening Transparency, Accountability and Responsiveness in Ghana
<b>SC</b>	Steering Committee

# 1. Programme Synopsis/Factsheet

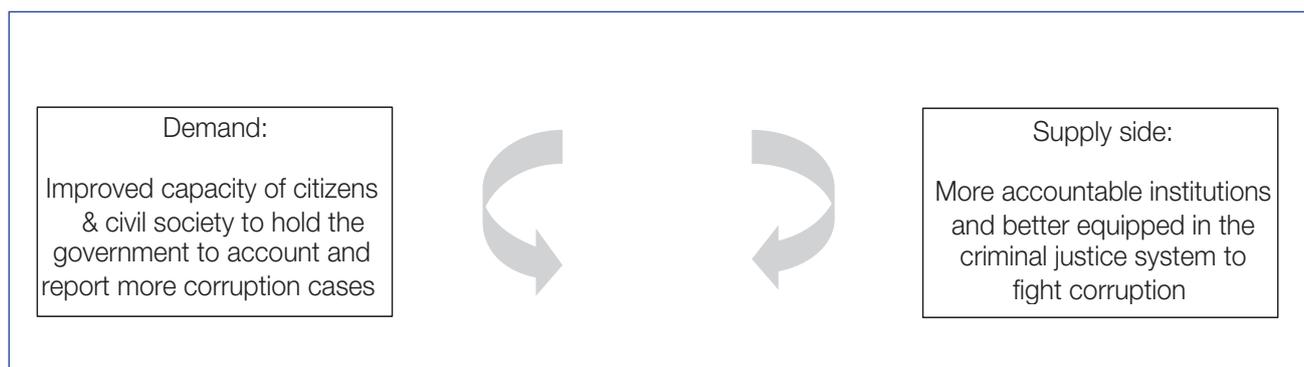
<b>Programme Title</b>	Ghana Anti-corruption, Rule of Law and Accountability Programme
<b>Programme Ref. Number</b>	GH/FED/037368 (11 <sup>th</sup> European Development Fund)
<b>Country</b>	Ghana
<b>Reporting Period</b>	1 <sup>st</sup> January 2018 - 31 <sup>st</sup> December 2018
<b>Overall Objective</b>	To promote good governance in Ghana by reducing corruption and improving accountability and compliance with the rule of law, particularly when it comes to accountability, anti-corruption and environmental governance.
<b>Specific Objective and Intended Key Results</b>	<p>To contribute to current reform processes in the area of rule of law, accountability, anti-corruption and environmental governance through support to key institutions, while at the same time increasing the ability of the public, civil society organisations and the media to hold government to account.</p> <ul style="list-style-type: none"> <li>• KR1: Accountability is enhanced, leading to increased accountability, a reduction in corruption and increased environmental governance.</li> <li>• KR2: Compliance with and respect for the rule of law is enhanced, particularly in the areas of accountability and anti-corruption.</li> </ul>
<b>Programme Start Date</b>	6 May 2016
<b>Programme Duration</b>	55 months
<b>Total Budget</b>	13 M€
<b>Implementing Agency</b>	FIIAPP
<b>SC Chair Institution</b>	OAG
<b>Contact Person</b>	Olga García-Pozuelo. Project Manager (FIIAPP HQ) Seyram Agbemenya. Programme Manager (ARAP-CU)

## 2. Presentation of the Programme

### 2.1 Description

The Programme's overall objective is to promote good governance in Ghana by reducing corruption and improving accountability and compliance with the rule of law, particularly when it comes to anti-corruption, accountability and environmental governance.

1. Corruption is a complex, multidimensional problem, deeply embedded in social, political and economic dynamics. The complexity of the issue has profound implications for the strategy adopted. The Programme therefore uses a multi-level, multi-stakeholder approach to support national efforts addressing both the supply and demand side of the accountability and anti-corruption chain.
2. On the demand side, the focus is on raising awareness among citizens and civil society actors to hold the government to account, demand greater accountability, and to be less tolerant of corruption. The effort on the supply side seeks to enhance the capacity of the criminal justice system to be more accountable and better equipped to deal with cases of corruption.
3. As a consequence, this will enable citizens to be more demanding and active, requesting information and reporting corruption; and will strengthen state institutions to be more responsive and accountable, responding to citizens' demands, facilitating information, and prosecuting corruption cases purposefully.



## Expected Results

The Programme therefore has two interlinked key results:

### Key Result Area 1:

Accountability is enhanced, leading to increased accountability, a reduction in corruption and increased environmental governance. To achieve this result, the main activities are:

- Building the capacity of civic education providers (NCCE, CHRAJ, CSOs and the media) to conduct campaigns, advocate and lobby for increased accountability and a reduction in corruption.
- Supporting the NCCE to conduct joint civic education and awareness on accountability (implemented by NCCE).
- Supporting CHRAJ to conduct anti-corruption campaigns and activities in line with the NACAP.
- Supporting to CSOs, the media, Parliament and selected Parliamentary Committees to enhance their accountability, anti-corruption, and lobbying and advocacy roles and functions. (implemented by STAR-Ghana)

### Key Result Area 2:

Compliance with and respect for the rule of law is enhanced, particularly in the areas of accountability and anti-corruption. The main activities under this KRA are:

- Building the capacity of prosecutors to prosecute corruption and related offences.
- Building the capacity of the Judiciary to hear and decide corruption cases and related offences and to hold government to account.
- Establishment of a free web-based library/resource centre for all stakeholders and users of the justice system.
- Supporting the police and Judiciary to combat corruption amongst their ranks.

4. The Programme identified five direct stakeholders (CHRAJ, NCCE, Ghana Police Service (GPS), Office of the Attorney General (OAG) and Judicial Service (JS), and three initial indirect stakeholders (Public Interest Accountability Committee (PIAC), Environmental Protection Agency (EPA) and the Economic and Organised Crime Office (EOCO), which could participate in activities (training, public education, etc), organised and led by the direct stakeholders.

## 2.2 Background

5. The European Union Delegation to Ghana (EUD) and the International and Ibero-American Foundation for Administration and Public Policies (FIIAPP) signed a Delegation Agreement on 6 May 2016 to implement the Accountability, Rule of Law, and Anti-Corruption Programme (ARAP) (other than those activities conducted by STAR-Ghana and those implemented by NCCE under a direct grant). After a five-month inception phase, a work plan was developed, and activities started in November 2016.

6. Following the first year of activity implementation, the beginning of the second year saw the development of long-term work plans based on stakeholders' priorities in line with ARAP objectives, clearly planned in a result-oriented manner.
7. With the finalisation of the three-year ARAP Work Plan (2018-2020) in February 2018, ARAP stakeholders effectively evolved into their roles and their activities have progressed from isolated interventions into activities connected to broader results areas. The 2018-2020 workplan also drew on broader linkages to the entire Programme, and increasing collaboration between stakeholders sharing identified common focus areas.
8. After two years of implementation, substantial progress has been achieved. In 2018, 68 activities were implemented, the majority of which fall under three main lines of action. These include:
  - > **Capacity Development** to strengthen the capacities of the institutions to deal with corruption cases.
  - > **Information Management Systems** to support stakeholders to improve service delivery to the public with the help of technology. The institutions deploying technology to improve their work with the support of ARAP include the Judiciary and the JS, the OAG, the GPS, and the EPA.
  - > **Public Education and Communication** support to the stakeholders with a view to strengthening their capacity to engage impactfully with the public and communicate appropriately in the delivery of public goods. The GPS, CHRAJ and EOCO are receiving support in this regard. The JS, the Judiciary and the Legal Aid Commission (LAC) are expected to receive support to implement activities in this line of action during 2019-2020.

## 3. Programme progress to date

### 3.0. Country Context Developments

9. Over the reporting period, corruption remained a frequently discussed topic in the media. Public institutions such as CHRAJ, the Office of the Special Prosecutor and the NCCE, as well as high level politicians and religious leaders, have continuously brought the current efforts and opportunities for enhancing anti-corruption into perspective. 2018 saw a number of high-profile cases relating to corruption, ranging from the collapse of the banking sector in Ghana, to the Anas Aremeyaw Anas<sup>1</sup> exposé of the deep-rooted corruption in Ghana football. In addition, the President of Ghana dismissed three High Court Judges on grounds of corruption based on investigations from a 2015 judicial corruption expose by Anas Aremeyaw Anas.
10. A major development in 2018 was the establishment of the Office of the Special Prosecutor (OSP) and the Appointment of the Special Prosecutor, Mr. Martin Amidu, by the President of Ghana. This was hailed as a great effort towards advancing the anti-corruption agenda of the Government but did not come without numerous challenges for the office in the execution of the Special Prosecutor's duties. The requirements to enable it to function effectively, including the Legislative Instruments (LIs)/Regulations to guide the operation of the office and a budget, were not provided for some time after its establishment. However, Government continues to promise support for the OSP and, in November 2018, an allocation of 180 million Ghana Cedis and two Legal Instruments were presented to Parliament. But by end of 2018, there had still been no progress on the latter.
11. The failure of Parliament to pass the Right to Information Bill, despite several assurances by Government that it would be expedited, was also a significant low point in the anti-corruption discourse of 2018. This led to efforts by several advocacy groups to push for the passage of the Bill, including demonstrations by various civil society groups. On the other hand, the passage of the Witness Protection Act in 2018 is critical for the fight against corruption. This crucial law will provide citizens with protection and encourage the reporting of corruption cases that are otherwise not reported because of witnesses' fear for their lives or families.
12. A major development that will influence the functioning of the entire criminal justice system is the **Supreme Court judgment** in R. V. Baffoe Bonnie and 4 others in June 2018 **regarding pre-trial**

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<sup>1</sup> Anas Aremeyaw Anas (better-known as 'Anas') is a Ghanaian investigative journalist who maintains a high level of anonymity and regularly conducts undercover exposés of corruption, capturing those involved on video and sharing the videos with the media.

**disclosure of evidence in criminal matters.** In this case, the Supreme Court ruled and ordered all prosecutors to provide accused persons, irrespective of the charges levelled against them, with prosecution documents. This decision constituted a major breakthrough that affects the daily professional operability of the criminal justice system which led the Judiciary to issue a Practice Direction on the issue. This in turn led the OAG to begin the process to develop a guideline for the implementation of the judgment. ARAP has played a critical role in moving the discussion forward and supported the OAG and other justice sector actors in this regard during 2018.

13. In 2018, the **Auditor General**, Mr. Daniel Yao Domelevo was instrumental in ensuring the **recovery** of a significant amount of 67.32 million GHS from public officers, individuals and institutions who had committed financial infractions in the course of performing their duties. This triggered special audits to be conducted in public institutions.
14. According to the international **2018 Corruption Perception Index** published in early 2019, Ghana improved by one point compared to its 2017 score (increasing from 40 to 41 out of 100) - just below the global average of 43. Ghana also rose in the rankings – from 81 out of 180 countries in 2017 to 78 in 2018), performing better than 37 Sub-Saharan African countries such as Benin (40), Swaziland (38), Gambia (37) and Tanzania (36). However, Ghana remained below Botswana (61), Rwanda (56), Namibia (53), Senegal (45) and South Africa (43) amongst other African countries.
15. According to the Ghana Integrity Initiative, the enhanced performance of the Audit Service and Auditor General, the establishment of the OSP, and the reforms in the Judicial Service are among key institutional processes that could have impacted on Ghana's improved 2018 score and ranking on the Corruption Perception Index.
16. Corruption nonetheless remains a critical issue in Ghana and now, perhaps more than ever, there has been heightened attention on the need for Government to take the lead role in instituting anti-corruption measures to enhance its successes in the fight against corruption.

### **3.1. Programme Implementation Summary**

17. 2018 began with a stakeholders' planning retreat to develop the 2018-2020 workplan, which set the tone for planning and streamlining programme activities towards stakeholder focus areas and results. This process further deepened the lines of work for each stakeholder and guided the implementation of programme activities throughout the year. All stakeholders implemented activities within their identified lines of work with the exception of EOCO, which will begin to receive support in 2019.
18. As illustrated in Chapter 3.2 of this report, which provides a detailed analysis of all the activities implemented in 2018, all stakeholders were more active compared to previous years. The **EPA** was the most active stakeholder, implementing the highest number of activities in 2018. The **environmental governance** aspect of the programmes has progressed significantly with the establishment of four pilot programmes running under the **compliance monitoring** area, as well as significant

advances made in the area of environmental complaints management. The EPA's **public education** area is under development, with activity implementation to begin in during 2019. Two additional lines of work are also being considered: support for 'e-permitting' (digitalisation of permit applications) and for regional prosecutions of environmental breaches.

19. During the period under review, there were a series of reshuffles of key management positions affecting the Programme's engagement with **GPS'** Police Professional and Standards Bureau (PPSB) and Legal and Prosecutions Department. The frequent changes in leadership of the Police during 2018 made it difficult for the Programme to maintain interlocutors who could follow up on priorities for the Programme within the GPS. This delayed the implementation of some planned activities, especially the development of a gender strategy and a complaint management system in the PPSB. Nonetheless, substantial effort was put into building new relationships and alliances with the new management in order to make progress. With departments where there were no significant changes, for example, the Public Affairs Directorate, the ARAP partnership and collaboration was strengthened. Significant gains were also made in the communications and public education area, with a communication strategy finalised for the GPS. The support to the revision on the Police Service Instructions was also finalised in 2018, marking the first revised version of the Instruction since the 1960s. Support to the Police in the area of prosecutions began in the year under review, culminating in the development of the Police Prosecutions Guidelines (*Points to Prove*).
20. Activities of the OAG's **Directorate of Public Prosecutions (DPP)** were focused on enhancing the monitoring of prosecutions by other agencies, including the police. The Supreme Court ruling on disclosures also informed the focus on developing disclosure guidelines for prosecutors.
21. Support to the **Judicial Service** in 2018 focused predominantly on the Public Relations and Complaints Units (PRCUs), with support to equipping PRCUs across the country as well as training of staff and Judges responsible for the PRCUs on the use of a newly developed complaint management software. The Web-Based Legal Library tool was also finalised and informed several discussions with key stakeholders including the **Judiciary** and **Council for Law Reporting** on the best approach to hosting such a library.
22. **CHRAJ** activities focused on its role in the implementation and coordination of the NACAP. Under its NACAP implementation mandate, the **National Anti-Corruption Reporting Dashboard (NACoRD)** was finalised and launched, while selected CHRAJ investigators were trained to begin systemic investigations of public/state institutions. There was also deeper engagement with CHRAJ's Public Education Department to begin support for public education activities.
23. Support to the **Legal Aid Commission (LAC)** – previously the Legal Aid Scheme – focused on capacity development and training of legal aid lawyers and staff on their anti-corruption mandate. With the passing of the Legal Aid Commission Act of 2018, which establishes the Legal Aid Scheme as a Commission, the LAC's workplan was adjusted to reflect the new priorities of the Commission.
24. In the year under review, direct support to the NCCE was limited to the provision of technical expertise since the direct grant to NCCE under ARAP had been received.

25. Table 1 below outlines in a schematic way the Programme's stakeholders and the main Lines of Work and Lines of Action with each of them.

Table 1. Stakeholder lines of work and lines of action

Stakeholder	Line of Work	Line of Action
<b>FIIAPP</b>	Coordination and Management	<ul style="list-style-type: none"> <li>• Coordination</li> <li>• Communication &amp; Visibility</li> <li>• Monitoring &amp; Evaluation</li> </ul>
	Cross – cutting issues	<ul style="list-style-type: none"> <li>• Environmental Governance</li> <li>• Mainstreaming Gender in ARAP</li> <li>• Other cross-cutting areas</li> </ul>
<b>CHRAJ</b>	NACAP Coordination	<ul style="list-style-type: none"> <li>• NACAP Planning &amp; Monitoring</li> <li>• Public Education and Communication Strategy for NACAP Coordination</li> <li>• NACAP Reporting</li> <li>• Information Management System (IMS)</li> </ul>
	Implementing NACAP Mandates	<ul style="list-style-type: none"> <li>• Public Education for implementing direct NACAP mandates</li> <li>• Capacity development for systemic investigation on corruption</li> <li>• Transparency &amp; Integrity in Public Sector</li> <li>• Strategic Plan Development</li> </ul>
<b>NCCE</b>	Complementary Technical Support to NCCE	<ul style="list-style-type: none"> <li>• Capacity Development</li> <li>• Awareness raising and campaigning</li> <li>• Research</li> </ul>
<b>EPA</b>	Compliance: Monitoring and Enforcement	<ul style="list-style-type: none"> <li>• Information Management System for Compliance Monitoring</li> <li>• Public Education on Compliance</li> </ul>
	Complaints management	<ul style="list-style-type: none"> <li>• Information Management System for Complaints</li> <li>• Management Management and resolution of complaints</li> <li>• Public Education to enhance complaints</li> </ul>
<b>LAC</b>	Strengthen LAC Anti-Corruption Role	<ul style="list-style-type: none"> <li>• Capacity development &amp; Training</li> <li>• Public Education Legal Aid Law &amp; Policy</li> </ul>
<b>JS</b>	Hear and Adjudicate Cases of Corruption	<ul style="list-style-type: none"> <li>• Capacity development to deal with corruption cases</li> <li>• Capacity development on Case Management</li> </ul>
	Web – Based Legal Library	<ul style="list-style-type: none"> <li>• Information Management System (Web – Based Legal Library)</li> </ul>
	Internal Control & Accountability / PRCU	<ul style="list-style-type: none"> <li>• Capacity Development for Public Relations and Complaint Units</li> <li>• Information Management System Accountability &amp; Ethics</li> <li>• PRCU Public Education &amp; Communication</li> </ul>

Stakeholder	Line of Work	Line of Action
GPS	Prevent Internal Corruption	<ul style="list-style-type: none"> <li>• Internal Control Mechanisms</li> <li>• Ethics &amp; Professionalism (Service Instructions)</li> <li>• Enhance Police Accountability &amp; Public Education</li> <li>• Gender mainstreaming</li> <li>• IMS</li> </ul>
	Capacity Development to Prosecute Corruption Cases	<ul style="list-style-type: none"> <li>• Capacity Development</li> </ul>
OAG	Capacity to Prosecute Corruption Cases	<ul style="list-style-type: none"> <li>• Capacity Development</li> </ul>
	Prosecution Case Management	<ul style="list-style-type: none"> <li>• Information Management System (Docket Management Platform)</li> </ul>
	Inter- Anti – Corruption Agencies Coordination	<ul style="list-style-type: none"> <li>• Cooperation among agencies</li> </ul>
EOCO	Strengthening communication and outreach	<ul style="list-style-type: none"> <li>• Capacity Development in Communication and Public Affairs</li> </ul>

## **3.2. Programme Management**

### **Local office**

26. The Programme is managed by the International and Ibero-American Foundation for Administration and Public Policies (FIIAPP). This is the delegated body which implements the tasks described in the Description of the Action on behalf of the European Commission, contractually linked by a Delegation Agreement.
27. A permanent Coordination Unit (CU) to implement the Programme has been established, located at Secant Tower Building, Plot No. 398, Papa Monrovia Street (formerly 7th Lane), Osu, Accra.
28. The leased premises have four office spaces, a meeting room and open space for administrative staff and training. A training room, located on the second floor and used as a conference and meeting room by the CU, was also offered to all Programme stakeholders to use for training courses. However, after a cost effectiveness analysis of the use of the training room, and to maximise the Programme's resources, the CU decided not to keep renting the space. An amendment to the tenancy and maintenance office contract was signed on 15 March 2018 to remove the tenancy of the 2nd Floor - East Wing from the contract, which reduced the monthly basic rental by 1.411€ and the overall costs for service charges proportionally.

## Programme Staff

29. After an evaluation of the Programme's needs, and to increase knowledge management of the Programme, technical assistance was engaged from April 2018 to manage an Activities Information System (AIS) developed by FIIAPP.
30. The Programme also continues with the support of long-term advisors to follow up lines of action directly with each stakeholder.

## Structure

<b>FIIAPP Office in Accra (ARAP Coordination Unit)</b>	
Team Leader	Ms. Inma Zamora (till October 2018)
Key Expert in Rule of Law	Mr. Tuinese Amuzu (from December 2018)
Key Expert in Civic Education	Mr. Riccardo D'Emidio
Programme Officer	Ms. Seyram Agbemenya
Finance Officer	Mr. Juan de Marañón
Knowledge Management	Ms. Elisa Marraco Anda
Administrative Assistant	Ms. Christiana Antwi
<b>FIIAPP HQ in Madrid</b>	
Project Manager	Ms. Olga García-Pozuelo
Administrator	Ms. Sonsoles de Juan
Logistics/Project Officer	Mr. Giovanni Quitadamo
<b>ARAP Long Term Advisors</b>	
Environmental Governance	Michael Nest
General advice	Gregory Moran
Prosecution	Daniel Suter
Monitoring	Enton Dimni

## Expertise supporting the Programme during 2018

<b>Action /Activities</b>	<b>Experts involved</b>
FIIAPP ARAP Three-Year Planning and Facilitators	Samuel Cudjoe (GH) Greg Moran (SA)
CHRAJ NACAP Communication Strategy	Charles Mawusi (GH)
CHRAJ NACoRD (NACAP IT monitoring tool)	Nathanael Tombs (CN)
NCCE Information sharing	Vitus Azeem (GH), Charles Mawusi (GH), Dr. Bin Yahya (GH), Dr. Hayford Benjamin Kwashie (GH)
EPA monitoring compliance	Michael Nest (CN), Myra Quarm (GH), Samuel Bekoe (GH),

Action /Activities	Experts involved
EPA legal department & JTI (environmental Courts)	David Asumda (GH)
LAS Training Manual	Tuinese Amuzu (GH)
Police Persecution Analysis	Daniel Sutter (UK), Steve Smith (UK)
AGD Registry Database	Christopher Munga (GH)
AGD Prosecution	Daniel Sutter (UK)
JS web-based library/EPA	Christopher Munga (GH)

### **Recruitment of the Key Expert Rule of Law (KE2) Position of ARAP**

31. Following a rigorous recruitment process, the Key Expert- Rule of Law position has been filled since December 2018 by Mr Tuinese Amuzu, a legal expert from Ghana who previously supported ARAP as an Advisor to the Legal Aid Scheme (LAS) (as it then was), undertaking a capacity needs assessment and the development of a training manual for LAS staff. Mr. Amuzu has extensive experience in the legal aspects of development work, cooperation, human rights and anti-corruption.

### **Team Leader replacement**

32. At the end of October 2018, the former Team Leader, Mrs. Inmaculada Zamora was appointed as FIIAPP Secretary General. Since then, FIIAPP worked closely with the Spanish Ministry of Justice to select the best profile to replace Ms Zamora. At the time of reporting, FIIAPP had officially communicated to the EUD the designation of the new team leader, Mrs. Ana Esther Sánchez, Registrar of the Spanish National High Court.

33. Pending final confirmation of the Spanish Ministry of Justice of the candidate to be appointed as ARAP Team Leader, Mr. Amuzu was acting team leader.

### **Administrative and Managerial Developments**

34. FIIAPP has been following the road map towards the Contracting deadline (6 May 2019) by recruiting and contracting expertise, services and supplies needed to support the implementation of activities and provide necessary equipment for stakeholders. To this end, three main tenders were launched and contracts signed during 2018 for the following services and supplies:

Table 2. Main contracts awarded during 2018

Description	Awarded	Amount (€)	Starting Date	Ending Date	Status
Support in Policing and Prosecution	Francis Norga Baah	18.000 €	4/1/18	End of the project	Ongoing
Facilitator	Samuel Osei Bekoe	18.000 €	16/1/18	End of the project	Ongoing
Web content writer and copy editor	Sian Jones	45.000 €	7/2/18	End of the project	Ongoing
Facilitator	Samuel Cudjoe	42.000 €	23/2/18	End of the project	Ongoing
IT hardware support (1/2 experts)	Alphatrade Enterprise	28.000 €	10/4/18	31/12/20	Ongoing
Police HR (1/2 experts)	David Cater	72.000 €	23/4/18	End of the project	Ongoing
IT hardware support (2/2 experts)	Wiss Pri Technologies Limited	28.000 €	25/4/18	31/12/20	Ongoing
AT knowledge management support	Elisa Marraco Anda	19.600 €	27/4/18	1/8/19	Ongoing
Furniture and office supplies	Office Furniture	200.000 €	4/5/18	End of the project	Ongoing
IT software development (1/5 experts)	Chris Munga	108.000 €	7/5/18	End of the project	Ongoing
IT software development (2/5 experts)	Daniel Marfo	72.000 €	7/5/18	End of the project	Ongoing
IT software development (3/5 experts)	Benjamin Ayken	72.000 €	7/5/18	End of the project	Ongoing
IT software development (4/5 experts)	Benjamin Afful	72.000 €	7/5/18	End of the project	Ongoing
Ghana Police Watch	Creative Storm Network	50.000 €	21/5/18	End of the project	Ongoing
Prosecutors (2/2 experts)	Elisabeth B. Jones	90.000 €	28/5/18	End of the project	Ongoing
Gender Policy GPS	KAIPTC	50.000 €	25/6/18	End of the project	Ongoing
Support Ghanaian institutions and impart anti-corruption trainings	Shamima Muslim	18.000 €	16/7/18	End of the project	Ongoing

Description	Awarded	Amount (€)	Starting Date	Ending Date	Status
Facilitator	Benedictus Treveh	30.000 €	27/7/18	End of the project	Ongoing
Facilitator	Suzan Yemidi	30.000 €	3/9/18	End of the project	Ongoing
IT software development (5/5 experts)	Nathanael Fournier-Tombs	72.000 €	5/9/18	End of the project	Ongoing
Training on systemic investigation for CHRAJ	KPMG	19.500 €	18/9/18	End of the training	Ongoing
Strategic advise to ARAP partners	LADA	275.000 €	26/11/18	End of the project	Ongoing
Media Management Services	Stratcomm Africa	290.000 €	1/3/19	End of the project	Ongoing

35. The global service contracts signed by FIIAPP allows the Programme to benefit from several services, covering the following areas:

Table 3. Global contracts

Contract	Description	Awarded	Starting Date	Ending Date	Status
FIIAPP Global Tender	Travel Agency and logistics provider (out-plant)	Viajes El Corte Inglés	04/10/2017	2 years, renewable for equal and successive periods	Ongoing
FIIAPP Global Tender	Audit services	Ernst&Young	09/01/2017	2 years, renewable for equal and successive periods	Ongoing

36. The following tenders and contracts will be launched and are expected to be awarded in early 2019, before the contracting deadline:

- > Contracting of research services in areas relevant to the programme.
- > Contracting of monitoring services in areas relevant to the programme.
- > Short-term experts for Police Training.
- > Short-term experts for Public Education.
- > Short-term experts to support the EPA in the development, planning and management of a set of public education campaigns relating to compliance monitoring, complaints management and e-permitting.
- > Vehicle cinema caravan (NCCE).

37. According to the 2018-2020 workplan agreed with stakeholders during the 2nd planning retreat (Ada, 20-22 February 2018), FIIAPP will follow the roadmap for contracting and procurement towards guaranteeing the proper implementation of the activities. The draft work plan for 2019 and 2020 developed at this workshop (Annex 3), should be costed to allocate the resources needed for the implementation.

### Procurement and Equipment

38. During the first quarter of 2018, stakeholders were requested to define the actual needs of equipment for their institutions, linked to an activity and to a concrete result due to the limited resources available.

39. Following agreements by all stakeholders on procurement needs, the following tables show items that have been delivered with respect to related stakeholder institution.

Table 4. Equipment delivered to the stakeholders

STK	ITEM	TYPE	UNITS
AG	Complete sets of desktop computers including Antivirus, Microsoft Office and Microsoft Licence;	IT	13
AG	Medium capacity printers	IT	12
AG	Professional and high quality printer	IT	1
AG	Routers WIFI	IT	13
AG	Uninterruptible Power Supply (UPS)	IT	13
EPA	Cisco Switch Specifications at a Glance	IT	1
EPA	Tablet	IT	3
EPA	Server	IT	2
EPA	i5 Desktop Specs	IT	2
EPA	Printer/A3 Scanner/Photocopier	IT	1
EPA	HP DesignJet T1700 Postscript® Printer	IT	1
EPA	Drone	IT	2
EPA	Scan Internet Security Suite	IT	4
EPA	Backup Drive	IT	1
EPA	Wireless Router	IT	1
EPA	i5 Desktop Specs	IT	3
EPA	Printer/ Scanner/Photocopier	IT	3

<b>STK</b>	<b>ITEM</b>	<b>TYPE</b>	<b>UNITS</b>
<b>EPA</b>	Wireless Router	IT	3
<b>EPA</b>	Tablet	IT	6
<b>JS</b>	Desktop computers	IT	10
<b>JS</b>	Microsoft Licence	IT	10
<b>JS</b>	Microsoft Office	IT	10
<b>JS</b>	Monitor, keyboard, mouse	IT	10
<b>JS</b>	Antivirus Kaspersky	IT	10
<b>JS</b>	Big Printer/Scanner	IT	1
<b>JS</b>	Small printers	IT	10
<b>JS</b>	UPS (power backup system)	IT	10
<b>JS</b>	Wireless Router	IT	9
<b>JS</b>	Executive Table	Furniture	7
<b>JS</b>	Stdd. Office Table	Furniture	7
<b>JS</b>	Exec. Swivel Chair	Furniture	7
<b>JS</b>	Office Swivel chair	Furniture	21
<b>JS</b>	STdd Office chairs	Furniture	21
<b>JS</b>	Visitor's chairs	Furniture	26
<b>LAS</b>	Desktop computers	IT	10
<b>LAS</b>	Microsoft Licence	IT	10
<b>LAS</b>	Microsoft Office	IT	10
<b>LAS</b>	Monitor, Keyboard, Mouse	IT	10
<b>LAS</b>	Antivirus Kaspersky	IT	10
<b>LAS</b>	Big Printer/Scanner	IT	1
<b>LAS</b>	Small printers	IT	9
<b>LAS</b>	UPS (power backup system)	IT	10
<b>LAS</b>	Tablet	IT	6
<b>CHRAJ</b>	Desktop computers	IT	10
<b>CHRAJ</b>	Monitor 24'', keyboard, mouse	IT	10
<b>CHRAJ</b>	UPS (power backup system)	IT	10
<b>CHRAJ</b>	Microsoft Office	IT	10
<b>CHRAJ</b>	Windows	IT	10

STK	ITEM	TYPE	UNITS
CHRAJ	Antivirus	IT	10
CHRAJ	Small printers	IT	10
CHRAJ	Multifunctional printer	IT	1
CHRAJ	Server Software	IT	1
CHRAJ	Server	IT	1
CHRAJ	Server Monitor	IT	1
CHRAJ	Server UPS	IT	1
CHRAJ	KVM Switch	IT	1
CHRAJ	Wi Fi Routers	IT	5
CHRAJ	"Desktop Phone Recorders "	IT	5
CHRAJ	8 Port Manageable Switch Gigabit	IT	5
CHRAJ	Digital voice recorders	IT	5

## Contractors

### Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) International Services

40. During the reporting period, the KE2 provided by GIZ has left the Programme and returned to his home country. As mentioned in paragraph 31 above, the KE2 position has now been filled by a former non-key expert who was providing a technical assistance to the Legal Aid Scheme.
41. In order to strengthen the accountability towards the financing authority and to stakeholders, GIZ has increasingly aligned its reporting with the AIS established by FIIAPP.
42. GIZ has maintained its back-office management structure with a senior and a junior project manager based in Addis Ababa as well as a procurements and contracts expert in Addis, Accra and at HQ level in Germany. Although few in number, the process of identification, selection and contracting of non-key experts (NKE) has run smoothly during the reporting period.
43. The regular application of a formalised confirmation of NKE assignments, categories, working days and tasks before mobilisation has been an improvement during the reporting period.
44. Along with the replacement of KE2, the contract was also amended to redefine the expert's categories according to the budget. The overall agreement with GIZ ensures that the Programme can deliver services and supplies during the implementation, and beyond the contracting deadline.
45. A total of 544 experts' work-days have been provided from 1 January to 31 December 2018, as follows:

Table 5. Expert work-days provided by GIZ

Expert category	Working days
Key expert 2- Heikki Wendorf	23
Key expert 2 -Edward Tuinese Amuzu	15
Senior mobilised	10
Senior home based (home-based)	121
Senior advisory services	375
Junior	0
Administrative support	0
<b>TOTAL</b>	<b>544</b>

#### **Audit and 2018 expenditure**

46. A second expenditure verification conducted by the audit firm Ernst & Young S.L. has been performed successfully, covering the period from 1 January to 31 December 2018.
47. The 2018 annual audit reflects an expenditure verification in the amount of 2.729.930 € considering only direct costs.
48. The expenditure verification to this technical report, certifying the actual expenses of the Programme, is detailed in the Expenditure Verification Report, and can be summarised as follows:

<b>PROJECT NUMBER</b>	<b>GHANA/FED/2016/373-284</b>
<b>TITLE</b>	<b>Accountability, Rule of Law and Anti-corruption Programme-ARAP</b>

	Budget después de Adenda 02/07/18	Execution	% executed	Execution 2016	Execution 2017	Execution 2018
1. Human Resources	2.454.751,75 €	1.388.406,98 €	56,56%	305.187,50 €	549.590,90 €	536.830,86 €
2. Travel	842.332,00 €	315.159,67 €	37,42%	57.156,54 €	146.604,31 €	111.398,83 €
3. Equipment and supplies	1.080.900,50 €	269.509,11 €	24,93%	42.679,08 €	23.982,59 €	202.847,44 €
4. Local office	440.600,00 €	259.159,96 €	58,82%	52.223,85 €	111.450,18 €	95.485,93 €
5. Contracts	3.200.000,00 €	947.240,78 €	29,60%	0,00 €	0,00 €	947.240,78 €
6. Other costs, services	3.715.101,09 €	1.521.097,17 €	40,94%	55.409,08 €	629.561,73 €	836.126,36 €
7. Other	30.856,44 €	30.856,44 €	100,00%	21.058,03 €	9.798,41 €	0,00 €
Provision for contingency reserve	384.991,00 €	0,00 €	0,00%	0,00 €	0,00 €	0,00 €
<b>TOTAL DIRECT COST</b>	<b>BUDGET</b>	<b>TOTAL EXECUTED</b>	<b>% EXECUTION</b>	<b>Execution 2016</b>	<b>Execution 2017</b>	<b>Execution 2018</b>
	12.149.532,78 €	4.731.430,11 €	38,94%	533.714,08 €	1.470.988,12 €	2.729.930,19 €

	1 <sup>st</sup> Report	2 <sup>nd</sup> Report	3 <sup>er</sup> Report	TOTAL EJECUTADO
ACUMULATED DIRECT COST	533.714,08 €	1.470.988,12 €	2.729.930,19 €	4.734.632,39 €
PROFIT(7%)	37.359,99 €	102.969,17 €	191.095,11 €	331.424,27 €
ACUMULATED TOTAL COST	571.074,07 €	1.573.957,28 €	2.921.025,31 €	5.066.056,66 €

TOTAL EXECUTED (B)	5.066.056,66 €
LEGAL COMMITMENTS paid (C)	820.000,00 €
LEGAL COMMITMENTS YEAR 2	469.500,00 €

49. As communicated by the EUD representatives, the Programme will include an external audit during 2019, to be contracted by the European Union (EU). Both FIIAPP HQ and the CU in Accra will coordinate closely in terms of resources dedication and availability of information to be delivered to the auditors.

## Knowledge Management

50. Considering the progress made during the two years of ARAP implementation and the data generated, there was a need to record all information regarding the activities in a consistent manner so that all team members - current and future if any, and stakeholders can easily access information. As a result, a new position was created to manage the Programme's knowledge in April 2018.
51. Each activity entails a list of documents - concept note, agenda, participants list, and activity and mission reports - that enables its implementation. Prior to the finalisation of programme documents, and as part of the Programme's knowledge management, all draft documents are saved in Dropbox prior to their update on the AIS tool. The system is used to record the final programme information relating to specific activities of stakeholders in relation to their respective workplans. Stakeholders can log in to the system through the Website (<http://www.arapghana.eu/sia/web/>) and check the information with a generic username (arap.stakeholders) and password (arap.ghana). The Dropbox serves as a backup for all programme documents and knowledge management materials.
52. To reinforce the communication and visibility of the Programme, the ARAP website (<http://arapghana.eu/>) was designed and launched during the second quarter of 2018. There has been close communication between the knowledge management support person and the content manager of the website, as the former has been progressively providing the latest updates of the AIS to aid in the update of the website and the ARAP social media pages.
53. Flickr has been used to collate and manage pictures of various ARAP activities and events as a way of supporting the knowledge management of the Programme. Pictures are uploaded in the ARAP [Flickr](#) account. Each activity has a unique link where its pictures can be accessed and offers an opportunity for stakeholders to access and download pictures from various activities.

## 3.3. Activities Description. ARAP in Figures

54. A total of 68 activities were supported by ARAP during 2018. Detailed descriptions, including participants and other specifics, can be viewed in the AIS while the main features are reflected in Annex 1. This chapter presents a snapshot in figures of what, with whom, and for whom activities have been implemented.

## Activities by Stakeholder

55. Aggregated by stakeholder, the following tables show the activities implemented in each line of work, the typology (workshop, analysis, etc) and the number of participants.

Table 6: Types of activities

Types of activities		FIIAPP	GPS	AG	JS	CHRAJ	NCCE	LAS	EOCO	EPA	TOTAL
C	Specialized Consultancy	1	1	1	1	2	-	-	-	1	7
E	Exchange visit	-	-	-	-	-	-	-	-	-	-
G	Management	1	-	-	-	-	-	-	-	-	1
I	System & equipment implementation	-	-	1	2	1	1	1	-	-	6
M	Missions	2	1	-	-	1	-	-	-	3	7
O	Other/neutral	1	1	1	2	-	-	-	-	2	7
R	Research, study, diagnostic	-	2	-	1	-	-	-	-	1	4
S	Seminar, conference	-	-	-	1	2	-	-	-	-	3
T	Trainings	-	-	1	2	4	-	1	-	-	8
W	Workshops, meetings	6	5	4	1	3	1	1	-	4	25
	Total Activities	11	10	8	10	13	2	3	-	11	68

## Participants

56. A total of 1.849 people have taken part in ARAP activities this year. Many of them, around 1,500 could be considered “indirect participants” as they are not stakeholders or direct beneficiaries of ARAP but rather have benefited from ARAP activities because they attended seminars or conferences, particularly during the anti-corruption week (NCCE research launch and dialogue, and CHRAJ Anti-corruption week’s opening and closing).

Table 7. Participants by Stakeholder and Line of Work

Code	Lines of Work	N° of Activities	Participants		
			M	F	Tot
<b>FIIAPP</b>		11	99	67	166
LW1	Coordination and Management	10	96	64	160
LW2	Cross-Cutting Issues	1	3	3	6
LW2	Cross-Cutting Issues	1	3	3	6
<b>GPS</b>		10	307	72	379
LW10	Capacity to Prosecute Corruption Cases	4	26	7	33
LW9	Prevent Internal Corruption	6	281	65	346
<b>AG</b>		<b>8</b>	<b>102</b>	<b>76</b>	<b>178</b>
LW11	Capacity to Prosecute Corruption Cases	1	-	1	1
LW12	Prosecution Case Management	4	20	14	34
LW13	Inter-Anti-Corruption Agencies Coordination	3	82	61	143
<b>JS</b>		10	98	61	159
LW6	Hear and Adjudicate Cases of Corruption	2	14	19	33
LW7	Web-Based Legal Library	1	2	1	3
LW8	Internal Control and Accountability / PRCU	7	82	41	123
<b>CHRAJ</b>		<b>13</b>	<b>427</b>	<b>224</b>	<b>651</b>
LW4	NACAP Coordination	11	377	195	572
LW5	Implementing Direct NACAP Mandates	2	50	29	79
<b>NCCE</b>		<b>2</b>	<b>4</b>	<b>2</b>	<b>6</b>
LW16	Complementary Technical Support to NCCE Grant	2	4	2	6
<b>LAS</b>		<b>3</b>	<b>46</b>	<b>18</b>	<b>64</b>
LW3	Strengthen LAS Anti-Corruption Role	3	46	18	64
<b>EOCO</b>		-	-	-	-
LW17	Strengthening communication and outreach	-	-	-	-
<b>EPA</b>		<b>11</b>	<b>176</b>	<b>70</b>	<b>246</b>
LW14	Compliance: Monitoring and Enforcement	8	134	46	180
LW15	Complaints Management	3	42	24	66
<b>Total</b>		<b>68</b>	<b>1259</b>	<b>590</b>	<b>1849</b>

## Participating Institutions

57. A total of 127 institutions participated in ARAP activities during 2018. The complete list and number of activities in which the institutions participated is provided in Annex 1 and in the AIS.

## Experts engaged

58. A total of 25 experts from different nationalities, mostly Ghanaian, have been engaged.

Table 8. Experts engaged during 2018 by country

Country	Activities	Experts
<b>FIIAPP</b>	<b>6</b>	<b>8</b>
Albania	1	1
Australia	3	1
Ghana	6	4
Italy	2	1
Spain	3	3
<b>GPS</b>	<b>9</b>	<b>6</b>
Ghana	6	4
United Kingdom	2	1
<b>AG</b>	<b>7</b>	<b>4</b>
Ghana	6	4
United Kingdom	2	1
<b>JS</b>	<b>9</b>	<b>6</b>
Ghana	6	4
Italy	2	1
Spain	3	3
<b>CHRAJ</b>	<b>7</b>	<b>4</b>
Canada	3	1
Ghana	6	4
United Kingdom	2	1
<b>NCCE</b>	<b>1</b>	<b>4</b>
Ghana	6	4
<b>LAS</b>	<b>2</b>	<b>1</b>
Ghana	6	4
<b>EOCO</b>	<b>-</b>	<b>-</b>
<b>EPA</b>	<b>9</b>	<b>5</b>
Australia	3	1
Ghana	6	4

59. The detail of the experts, number of activities undertaken and with which stakeholder, and the number of working days per activity, is provided in the following tables.

Table 9: Number of activities by expert during 2018

Experts	Country	Num. Activities in which experts have been engaged									
		FIIAPP	GPS	AG	JS	CHRAJ	NCCE	LAS	EOCO	EPA	Total
Benjamin Kwashie Hayford	GH	-	-	-	-	-	1	-	-	-	1
Charles Mawusi	GH	-	-	-	-	1	1	-	-	-	2
Christopher Munga	GH	1	-	3	3	-	-	-	-	2	9
Daniel Benjamin Suter	GB	-	4	2	-	-	-	-	-	-	6
Daniel Marfo Ata	GH	1	-	-	-	-	-	-	-	-	1
Diana Asonaba Dapaah	GH	-	-	-	1	-	-	-	-	-	1
Ibn Yahaya	GH	-	-	-	-	-	1	-	-	-	1
Edward Tuinese Amuzu	GH	-	1	-	-	1	-	2	-	-	4
Elisabeth Barbara Jones	GB	-	-	1	-	-	-	-	-	-	1
Enton Dimni	AL	1	-	-	-	-	-	-	-	-	1
Greg Moran	GH	-	1	1	-	-	-	-	-	-	2
Jose de la Mata	ES	-	-	-	1	-	-	-	-	-	1
Michael Nest	AU	1	-	-	-	-	-	-	-	3	4
Myra Nyamekeye Darko Quarm	GH	-	-	-	-	-	-	-	-	3	3
Nathanael Tombs	CA	-	-	-	-	3	-	-	-	-	3
Owusu Kwesi Koranteng	GH	-	1	-	-	-	-	-	-	-	1
Pedro Laguna	ES	1	-	-	2	-	-	-	-	-	3
Pelayo Alvarez	ES	1	-	-	2	-	-	-	-	-	3
Riccardo D'Emidio	IT	1	-	-	2	-	-	-	-	-	3
Samuel Cudjoe	GH	1	-	-	-	-	-	-	-	1	2
Samuel Osei Bekoe	GH	-	-	-	-	-	-	-	-	1	1
Sian Jones	GB	-	-	-	-	2	-	-	-	-	2
Steve Smith	GB	-	2	-	-	-	-	-	-	-	2
Victor Adusah Poku	GH	-	1	-	-	-	-	-	-	-	1
Vitus Adaboo Azeem	GH	-	-	-	-	-	1	-	-	-	1
<b>Total Activities</b>		<b>8</b>	<b>10</b>	<b>7</b>	<b>11</b>	<b>7</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>10</b>	<b>59</b>

## Geographical Coverage – Areas of Intervention

60. Although ARAP supports key stakeholders within the central government of Ghana, its interventions go beyond the capital, with activities implemented across all regions of the country. Significant of these has been the PRCU Compliant Management System and the Docket Registration System. These have extended ARAP support to all 10 regional offices of the Judiciary and the Officer of Attorney General. Other stakeholder related activities (e.g; workshops, trainings) have also been implemented in other regions and districts across the country. In the area of Environmental Compliance Monitoring, 4 pilot programmes have been designated in 4 district and 4 regions across the country. The table below shows the number of activities implemented in the various regions.

Table 10. Number of activities by geographical area

Region	FIIAPP	GPS	AG	JS	CHRAJ	NCCE	LAS	EOCO	EPA	Total
Across all Regions	1	3	1	5	1	1	1	-	2	15
Ashanti	2	1	-	-	1	1	1	-	2	8
Brong Ahafo	-	-	-	-	-	-	-	-	-	-
Central	1	-	-	-	-	-	-	-	4	5
Eastern	2	1	-	-	6	1	1	-	3	14
Greater Accra	9	5	6	5	7	-	-	-	2	34
Northern	-	2	1	-	1	-	-	-	-	4
Outside of Ghana	-	-	-	-	-	-	-	-	-	-
Upper East	-	1	-	-	-	-	-	-	-	1
Upper West	-	-	-	-	-	-	-	-	-	-
Volta	-	-	-	-	-	-	-	-	-	-
Western	-	1	-	-	-	-	-	-	1	2

## Activities Expenditure

61. There is currently no system in place to recover the exact cost (direct and indirect) for each activity. An approximate analysis summarising the direct costs by stakeholder is presented in Table 12. However, costs are most likely underestimated, and the table refers only to direct costs that are easily identifiable, incurred on the activities, costs of experts, logistics (hotels, daily subsistence allowances, travel and transportation), direct visibility materials, and equipment delivered.

62. FIIAPP expenses cover coordination and cross cutting issues (gender and environment) that have not been allocated to stakeholders. In addition, the following are not included as they are not directly related with activities: human resources; local office; and some costs for contracts (GIZ).

Table 11. Activity costs by stakeholder

Institution	2018
FIIAPP	102.541
AG	190.482
CHRAJ	413.917
EPA	137.504
GPS	179.233
JS	288.450
LAS	279.575
NCCE	8.775
<b>TOTAL</b>	<b>1.600.477</b>

Graph 1. Actual 2018 expenses



### **3.4. Activities Analysis: Main Results and Future Perspective, per Stakeholder**

#### **National Commission for Civic Education (NCCE)**

63. Public education and campaigns delivered under ARAP are key components for the success of the Programme. Effective public and civic education helps build citizens' confidence to detect and report corrupt practices and to feel empowered to demand accountable governance. The NCCE is a critical actor within the programme in developing and delivering public and civic education across the country, including in hard to reach districts.
64. Under the agreement with the EU delegation, NCCE is responsible for delivering civic education activities with the technical assistance of the Coordination Unit (CU). In light of this, the ARAP CU's support has focused on providing technical assistance in relevant thematic areas, as well as brokering partnerships with other stakeholders to develop joint actions and share knowledge.

#### *Interventions*

65. In 2018, the ARAP CU provided support to two main activities of the NCCE: providing technical assistance to the NCCE Staff Information Sharing workshop (NCCE13/01); and support to the printing and dissemination of the Research Report on Public Perceptions of Corruption (NCCE17/01).

#### *Findings*

66. The information sharing sessions (NCCE13/01) engaged over 400 staff members, ensuring that at least one member of staff for each of the 216 administrative districts, regional office and head office attended the event. The training covered a range of key concepts, legal tools and regulatory frameworks relating to anti-corruption. Moreover, this activity included the collaboration of several ARAP stakeholders (CHRAJ, EPA, EOCO, GPS, LAC), tightening the working relationship among them.

#### *Outlook*

67. The CU will continue, whenever requested by NCCE, to provide technical assistance in the relevant areas of the Programme. Similarly, the CU will continue brokering partnerships with NCCE and other Programme's stakeholders to encourage joint actions and initiatives through the organisation of the Public Education Working Group. In this regard, many stakeholders have expressed their desire for NCCE to act as a vehicle for their public education and outreach.

#### **Commission on Human Rights and Administrative Justice (CHRAJ)**

68. CHRAJ remains ARAP's key anti-corruption institutional stakeholder. Its role in leading the implementation and coordination of the NACAP is key to ensuring the realisation of the NACAP objective by all stakeholders. As the NACAP approaches its midterm, it has become more important for

CHRAJ to enhance its coordination role. During 2018, ARAP support to CHRAJ focused on supporting the enhancement of its coordination role, especially its monitoring of NACAP implementation across all implementing partners.

### *Interventions*

69. As ARAP supports the NACAP Coordination role of CHRAJ, a significant number of activities were implemented within this area. Most of the activities focused around the finalization on the [National Anti-Corruption Reporting Dashboard \(NACoRD\)](#) which aims to digitise reporting on the implementation of the NACAP. NACoRD activities focused around engagement with stakeholders to inform the development of the tool. In this regard, the NACoRD Stakeholders Sensitisation Workshop (CHRAJ02/02) and the NACoRD Stakeholders Validation Workshop (CHRAJ02/03) were implemented to expose stakeholders to the use of the tool, as well as to gather stakeholder inputs for enhancing the tool. Training for the staff of CHRAJ on managing the NACoRD (CHRAJ02/04) was also implemented to support the local management of the tool when it is handed over to CHRAJ. These activities were supported with the provision of equipment necessary to support the management of the NACoRD (CHRAJ02/05).
70. Further technical assistance was provided to support CHRAJ in the development of a [Communication Strategy for NACAP](#) (CHRAJ05/01). The strategy was developed through a series of consultations and engagements with the Monitoring Committee (MONICOM), High Level Implementation Committee (HiLIC) and National Implementation Support Unit (NISU) and is awaiting final approval by CHRAJ.
71. As an annual requirement under the NACAP, and in line with its NACAP mandates, ARAP supported an activity for the preparation of the [NACAP 2017 Annual Progress Report](#) (CHRAJ04/03). The MONICOM was supported to analyse the various reports presented by the NACAP implementing partners on the anti-corruption activities undertaken over the year. The report provides a detailed overview of the situation of anti-corruption interventions in Ghana and the roles that stakeholders play in line with their respective NACAP mandates. The reports were disseminated in the 2018 National Anti-Corruption day event (CHRAJ03/05) held on 10 December 2018.
72. The CU supported CHRAJ in the development and roll out of the events in Anti-Corruption Week, gaining significant traction in print, digital and social media. Overall, the Programme invested in the development and dissemination of dedicated material, celebrating international anti-corruption day and highlighting key activities from ARAP and its stakeholders during the week. The communication efforts undertaken resulted in over 17,700 impressions in Twitter, over 900 interactions on Facebook, and occupied the front page of all leading national newspapers. These results highlight the positive and inclusive public debate that is taking place in Ghana on corruption and the relevant institutional measures in place to curb corruption and enhance accountability.
73. Additional activities in line with CHRAJ'S NACAP mandate were also implemented during 2018. The training of CHRAJ investigators on systemic investigations (CHRAJ10/01) was carried out in the last quarter of the year by KPMG and trained 20 CHRAJ investigators to carry out systemic

investigation in public institutions. Following the training, a plan will be developed during 2019 to carry out systemic investigation in selected institutions over the next two years. Training for Ethics Officers of Ministries, Departments and Agencies (CHRAJ13/01) was also implemented with participants from selected institutions participating. The activity was a continuation to the first training organised by CHRAJ in 2016.

### *Findings*

74. During the year under review, a new Director to head CHRAJ's Public Education Department was appointed. This led to an increased dialogue in the area of public education, which had previously been a low priority for CHRAJ, and consequently to a revived dialogue with the Commission.
75. The ARAP CU re-strategised its mode of engagement with CHRAJ in 2018, which has led to improved engagement overall. For example, CHRAJ has shown increased willingness to receive input from the ARAP CU in the conceptualisation of certain key activities such as the training for Metropolitan, Municipal and District Assemblies on NACoRD. Although the training was held in February 2019, it was preceded by a joint planning meeting between CHRAJ and ARAP during 2018. As a result of the dialogue, CHRAJ decided to collaborate with the Regional Coordinating Councils to build local ownership of the training in addition to making the training cost effective.
76. The senior leadership of CHRAJ also participated in ARAP funded activities during 2018 despite their busy schedules. For example, the Commissioner of CHRAJ was personally present to receive equipment's donated to CHRAJ by ARAP.
77. There is an improved level of willingness of CHRAJ to ensure ARAP and the EUD receive visibility for the support being provided under the Programme. For example, tweets from CHRAJ acknowledging support of ARAP in the training on NACoRD held in Akosombo Hotel proved useful in ensuring visibility for the EU.
78. Nonetheless, some challenges remain, particularly with regards to CHRAJ's perception of ARAP as a funding Mechanism for NACAP, as opposed to the Programme's technical assistance and capacity development design and objectives. Although some major activities have been implemented under ARAP, CHRAJ has not taken full advantage of the range of support that a programme like ARAP could offer.

### *Outlook*

79. CHRAJ remains one of the most critical institutions in the Ghanaian anti-corruption architecture. Despite the challenging relationship with the institution, the CU will continue supporting CHRAJ both as the coordinating body of the NACAP and as a direct NACAP implementer. The Programme will continue to engage CHRAJ support in its focus areas, most importantly in the area of public education, taking advantage of its renewed interest in the area and the strengthened relationship with the Public Education Department.

80. Preparations are underway to roll out a capacity needs assessment and a capacity development plan for CHRAJ's Public Education Department to strengthen capacities of department staff in a range of areas, including both relevant areas of thematic expertise (such as anti-corruption, accountability and integrity) as well as methodological know-how. It is expected that this area of work will not only deepen the collaboration between the CU and CHRAJ, but also generate a systematic work stream in public education in line with CHRAJ's direct NACAP mandates.
81. As a critical stakeholder in the anti-corruption space in Ghana, the CU will continue to engage with CHRAJ to focus more activities towards the implementation of its direct mandate under the NACAP. In addition to its coordination role for the implementation of NACAP, CHRAJ (as the national anti-corruption agency) must implement activities that can have direct results for the reduction of corruption and strengthening of systems against corruption.
82. During the remainder of the Programme, there will be a focus on enhancing the capacity of CHRAJ to perform its constitutional anti-corruption mandate and to continue to be a lead player in the fight against corruption, including through public education and awareness raising among citizens and Metropolitan, Municipal and District Assemblies (MMDAs) of NACAP as the main tool for the fight against corruption.

### **Environmental Protection Agency (EPA)**

83. Although the EPA was seen as an indirect stakeholder in the initial design of the Programme, it has evolved to become a major stakeholder. The leadership of EPA has collaborated well with the CU over the last year, and the EPA has been the stakeholder with the most activities implemented during 2018. The EPA has been receptive to receiving all forms of technical support that could enhance its work, which has resulted in the EPA receiving focused support for major operational reforms, particularly when it comes to compliance monitoring. A new digital system for monitoring permit-holders has been developed and piloted in small scale mining, which offered lessons necessary for the extension of the system to all of the EPA's portfolio such as business, industry, oil and gas (the system is designed to be eventually expanded to other areas). Further support to the EPA is being considered to enhancing its complaints management system, to develop a new digitalised 'e-permitting' system, and possible support for prosecution for environmental breaches at a regional level.

### *Interventions*

84. The type of environmental governance interventions required under ARAP is not described in the Action Plan, as environmental governance was deliberately left more open than other sectors. Dialogue between the EPA and ARAP has focused on three key areas for support: (1) improving compliance monitoring; (2) improving reporting and complaints management; and (3) public education on environmental governance. Under the area of compliance monitoring, ARAP supported the EPA to organise a stakeholder workshop in January 2018 (EPA04/01) to serve as a basis to start activities and support the testing of a pilot model – all undertaken during 2018. This was followed by the development of tools to inform the new compliance monitoring system to be developed (EPA 04/02; EPA04/09). Following this, the first pilot of the compliance monitoring system began (EPA04/05) and subsequent trainings for the expansion of the piloting to three other districts were implemented (EPA04/08).

85. These areas of intervention were identified following research and consultation from June to December 2017, which focused on identifying key challenges and opportunities for support. Three missions (FI-IAPP05/0, FI-IAPP04/02) resulted in two reports, one focussing on [illegal small-scale mining](#) and one on [broader environmental problems](#). The reports recommended a list of activities for potential support that were subsequently further refined to the three key areas noted in the Findings section below.
86. Small-scale mining was designed to be the *initial* focus of these interventions (with the exception of public education, which will be in two parts, one with a broader environmental governance focus from the outset). Internationally, problem-based responses to corruption and rule of law problems in environmental governance have produced better results than activities with a broad sectoral environmental governance focus without a specific problem to address.

### Findings

87. ARAP's research into links between environmental governance and the anti-corruption chain identified that weak compliance monitoring by the EPA of licence- and permit-holders with rights to exploit natural resources is a major challenge for environmental governance. Problems include inadequate resources (funds and staff), lack of inter-agency coordination, and corruption concerns. The EPA's responsibilities are broad and cover many areas. An NCCE survey (supported by ARAP) in 2017 identified the following problems: pollution (air and water), deforestation, illegal logging and sand-mining, land degradation, noise, oil spills, poor sanitation, and, in particular, non-compliant and illegal small-scale mining, which is a major a policy priority for government.
88. Improving compliance monitoring is a priority for strengthening environmental governance. However, limited resources are available to undertake compliance monitoring. Innovation was therefore required to optimise monitoring in the absence of new staff or funds. The EPA agreed that this innovation should be in the form of a revised and standardised compliance monitoring procedure that is also digitalised using specialised software and tablets or mobile phones. This new system was pilot-tested initially in a single district and then upscaled for re-testing in four districts. Almost 100 individual items of feedback on revising the system were received during the two pilot tests, and these were revised in the software.

### Outlook

89. Support to compliance monitoring is close to completion, pending any additional ARAP support to expand the new system to other areas of the EPA's portfolio. Public education activities around improving the quality and management of complaints will also be supported once the system goes 'live' in 2019. Additional ARAP support will focus on the priority area of complaints management, and then e-permitting and prosecutions for environmental breaches.
90. A multi-agency workshop to identify how to resolve jurisdictional disagreements over complaints management is planned for 2019. The complaints management system and related public education will then be planned around protocols agreed at this workshop.

91. Negotiation is continuing with the EPA about full ARAP support for two additional lines of work: support for 'e-permitting' and support for prosecutions for environmental breaches by regional EPA officers. Both lines of work are connected to the original ARAP Work Plan in that they will achieve some of the goals and implement some of the activities originally identified in the 2018 document. 2019 will see preliminary planning for support to e-permitting and prosecutions for environmental breaches at the regional level. E-permitting is a potentially large activity requiring the design of a new database to facilitate the allocation of permits. Careful planning will be required to obtain value for money, as well as to build effective public education to ensure an e-permitting system can be smoothly implemented and introduced to the public.

### **Legal Aid Commission (LAC)**

92. The provision of legal aid is required by the 1992 Constitution to ensure justice for all. A legal system cannot provide justice without legal aid to assist economically disadvantaged individuals assert and defend their rights to obtain a remedy. The citizenry may also need legal aid in discharging obligations imposed on them by Article 41 the 1992 Constitution (such as the obligation on citizens to take action against corruption). A justice system must also be impartial and accessible in delivering results to all regardless of their wealth.

93. The 1992 Constitution protects fundamental civil liberties, political and human rights including the right to legal defence. It also makes access to justice a key element of Ghana's democracy and justice system. Ghana's justice system comprises the Ministry of Justice and Attorney Generals Department, the Judiciary and Judicial Service, Ghana Police Service, Ghana Prisons Service, the Legal Aid Commission, and CHRAJ.

94. Ghana's justice system continues to reform to reduce inefficiencies and has made significant progress, including the use of alternative dispute resolution (ADR), setting up of specialised and fast track courts, and court automation. But inadequate legal aid, combined with the prohibitive cost of legal services, significantly impairs access to justice for the socially and financially disadvantaged. These issues have been identified in Ghana's medium-term National Development Policy framework, the Ghana Shared Growth and Development Agenda (GSGDA II), 2014-2017. The GSGDA prioritises increasing the capacity of the legal sector to enhance speedy and affordable justice and to support the quick disposal off of cases.

95. The GGSDA identified strategies including a review the Legal Aid Scheme Act, 1997 (Act 542); creating a Directorate of Public Defenders (DPD) under the Legal Aid Scheme (analogous to the Directorate of Public Prosecutions at the Office of the Attorney General); a Citizens' Advisory Bureau to give free legal advice to citizens; broadening access of the poor to legal aid; and strengthening the legal aid system to include making some services free through the support of ADR to avoid costly and delayed litigation.

96. Government recognises the importance of the legal aid and accepted the recommendation of the Constitution Review Commission to set up the Legal Aid Scheme as an Independent Constitutional Body. As a result, the Legal Aid Commission was established under the Legal Aid Commission

Act, 2018 (Act 977) and in accordance with article 294 (2) of the 1992 Constitution to replace the Legal Aid Scheme established by the Legal Aid Scheme Act, 1997.

97. ARAP's support to the Legal Aid Commission (LAC) has aimed to strengthen the capacity of the LAC to support members of the public who may need its services in the fight against corruption in Ghana, particularly in the performance of their obligations under Article 41(f) of the Constitution that exhorts every citizen of Ghana to take action to combat corruption in its various forms and to prevent waste and abuse of public resources. In addition, capacity development for the LAC will ensure that respect for the rule of law is enhanced as envisaged in Key result Area 2. The chances of the indigent receiving meaningful legal support through the various strata of the justice administration system will improve, thereby contributing to respect for the rule of law.
98. Therefore, from a conceptual perspective within the context of the overall ARAP anti-corruption approach and from the rule of law perspective, the LAC is a critical support mechanism for citizens who want to fight corruption through the justice system.

### *Interventions*

99. The support to the LAC during 2018 focused on enhancing the capacity of the lawyers and staff of legal aid in exercising its anti-corruption mandate, which for a long time has not been the focus of legal aid cases. Thus, and on the basis of the capacity needs assessment that was conducted in 2017, a [Training Manual on Basic Law and Anti-Corruption](#) was developed and validated to form the basis for future training on anti-corruption advocacy in the LAC (LAS02/01). Following the finalisation of the manual, selected staff of the LAC were trained as trainers (LAS02/01) to support the internal training within the commission across the country.
100. As the LAC has for a long time faced challenges of resources leading to obsolete or no equipment to support the provision of legal aid services nationally, ARAP CU provided the LAC with electronic equipment to aid its work across the country during 2018 (LAC02/05). To date, the LAC is the only stakeholder institution under the Programme to receive equipment support not related to the needs of specific activities.

### *Findings*

101. From 30 July to 10 August, 2018, ARAP provided the LAC with training of trainers on anti-corruption legislation and litigation, human rights litigation and basic laws for paralegals in Ghana. The training focused on the soft skills needed by the trainers in order to effectively deliver trainings on anti-corruption in future. The substantive content of the training dealt with the mandate of the LAC regarding the fight against corruption, and the legal and institutional frameworks for the fight against corruption in Ghana. Other focus areas of the training were basic criminal law (substantive and procedural) and basic civil law for paralegals in Ghana, and international law in relation to anti-corruption and legal aid. It is expected that the participants will use the knowledge gained to improve the fight against corruption as well as provide training for other members of staff and LAC partners.

102. ARAP engaged Law and Development Associates (LADA) to provide support to the LAC to develop a comprehensive legal aid policy, as required under the Legal Aid Commission Act, 2018. This Policy will be the over-arching framework within which legal aid will be provided in Ghana and may take account of features that are not necessarily part of legal aid at the moment, such as a system of paralegal practice.
103. Despite lacking sufficient resources, LAC has the support of its current staff as well as private attorneys. Although working in difficult circumstances, staff and attorneys remain motivated and willing to perform for their clients. ARAP is seeking to facilitate talks between the LAC, Ministry of Finance, EU and other donors to ensure progress for LAC to be able to use its most valuable resource – its experienced staff.

### *Outlook.*

104. Following the passage of the Legal Aid Commission Act, 2018, the Legal Aid Scheme has been formally designated as the Legal Aid Commission. The Act gives the LAC greater autonomy, although it still remains an agency under the Ministry of Justice. Although the preferred option would have been to move it out from under the Ministry, this would require an amendment of the Constitution.
105. In view of the new legislation setting up the LAC, ARAP has discussed an enhanced form of support to the LAC towards enhancing respect for the rule of law. Taking this into consideration, ARAP will support LAC to implement some of the requirements under the Act, such as the development of a Legal Aid Policy, the development of a Scheme of Service for the Commission, and the development of a system of paralegal practice.
106. Taking into account the requirements of the Supreme Court decision in the Rep v. Baffoe Bonnie and 4 others regarding pre-trial disclosures, LAC lawyers will require training so that they are able to make the necessary demands for pre-trial disclosures. A Practice Direction issued by the Chief Justice regarding pre-trial disclosures and case management will be the focus of the training, which will include discussions on Supreme Court practice and procedure for LAC lawyers in preparation for impact litigation in enhancing the rule of law and fight against corruption in Ghana.

### **Ghana Police Service (GPS)**

107. The GPS has continued to collaborate well with the ARAP CU during 2018. But despite the positive engagement with the GPS, 2018 saw several leadership reshuffles within the Service, with the head of the PPSB changing twice during 2018 (in May and September). These changes disrupted the plans and relations and the support to the PPSB and the Police Legal and Prosecutions Department which did not receive as much support as was initially envisioned. On the other hand, and partly due to the stability of the Public Affairs Department, which has maintained its Director for the past two years, the collaboration with the GPS through the Public Affairs Department received enhanced support from the Programme.

### Interventions

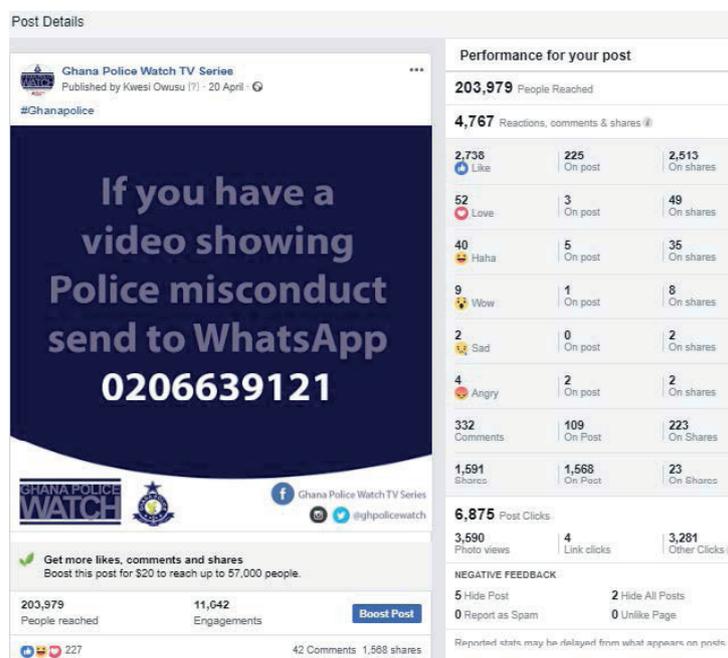
108. Activities within the GPS began with the concluding sessions of the Front Line Supervisors (GPS11/04). In the area of police prosecution, activities started with an assessment of Police prosecution functions and capacities (GPS10/03). The assessment report was validated (GPS10/04) by the GPS and informed a first activity in support of police prosecutions - the development and validation of the Points to Prove Handbook for Police Prosecutors (GPS16/05, GPS16/06). The Office of the Director-General of the GPS Legal and Prosecutions Department forwarded the draft Points to Prove to the Office of the DPP for the eventual approval during 2019 of the Attorney General and Minister of Justice.
109. Over the reporting period, ARAP support to GPS' public education and communication area has been significantly deepened. The GPS communication strategy was developed (GPS13/09) and validated (GPS10/04) in June 2018 by officers from a range of departments and units to ensure ownership across the Service. Participating departments included: Public Affairs Department, the Research and Planning Department, Human Resources Department, the Criminal Investigations Department, the Command and Staff College, the Police Academy, National Police Training School, the Detective Training School and the Public Safety Training School.
110. As part of the its Public Education and Communication Strategy, ARAP supported the GPS in developing and rolling out the [Ghana Police Watch Series](#) (GPS14/01). Specifically within this intervention, two dedicated episodes on anti-corruption were developed focusing on bribery on the road and in the bailing process. The Programme received high views on social media and provided a platform for citizens to engage and start discussions around police corruption and what role citizens could play.
111. The renewed communication and public education efforts of the GPS were the focus for the second ARAP Public Education Working Group Workshop (GPS13/11), led by the GPS with participation of all ARAP stakeholder intuitions. The focus on anti-corruption and law enforcement agencies is one of the five focus areas for public education in the ARAP Programme. This working group thus provided the space and opportunity for the GPS to identify synergies and joint work with other public and civic education providers.
112. During 2018, the CU advanced discussions to provide training on the pre-trial disclosure requirements as a result of the decision of the Supreme Court in the Rep. v. Baffoe Bonnie and 4 others. This training will be explored further in 2019 and there may be the need to consider the participation of police investigators as they play a critical role in gathering key information to aid in prosecution.
113. The Kofi Annan International Peacekeeping Training Centre has been engaged as Gender Consultants to develop a Gender Policy for the GPS. The Policy is under development and is expected to be finalised in June 2019.

### Findings

114. The GPS Legal and Prosecutions Department is eager to have the final draft of the Points to Prove approved by the Attorney General for the use of Police Prosecutors. The Guidelines will be

extremely helpful to Police Prosecutors regarding which elements of specific common offences they are required to prove in Court.

115. In the area of complaint management, ARAP has been waiting on the development of an electronic platform for the Police Professional and Standards Bureau (PPSB) in order to support it with the requisite capacity through training, the development of a Standard Complaints Procedure, and the provision of relevant equipment. However, Vas Intel, the IT firm developing the electronic platform for the PPSB on the understanding that this was on a pro bono basis, presented a bill which ARAP is unable to assume in the absence of a subsisting contract prior to their undertaking of the task.
116. In terms of public education, 2018 saw the development and initial roll out of the GPS Public Education and Communication Strategy. This strategy has been a critical tool to outline and structure the GPS' efforts to engage with citizens and civil society effectively, to contribute to enhanced accountability loops. Critical linkages were also established with other relevant public bodies working in the criminal justice sector. In this regard the Public Education Working Group remains a critical space for stakeholders to come together and identify synergies and joint work.
117. It is important to highlight the impact of the TV show "Ghana Police Watch" and its social media component. Over the year, the programme was broadcast on 23 leading TV channels, with major TV channels (Joy News, Etv Ghana, GTV and GHONE) reaching a viewership of two million people each. Minor channels (Family TV, Crystal TV Extra, GTV Govern and GBC 24) reach an additional viewership of 500,000 people. Ghana Police Watch has also been active on social media, primarily through the dedicated Facebook [Page](#) that has more than 26,000 subscribers and 27,000 followers. Some posts reach over 200,000 citizens across Ghana, providing information and effective channels on how to report Police misconduct (see figure below).



118. In terms of coordination, it is worth highlighting the uniting role that the Public Education Working Group holds for stakeholders in the Programme. Since the beginning of the Programme, the Working Group has been able to articulate five distinct areas to focus on in public education:
- > Awareness on corruption, public accountability and environmental governance (led by NCCE).
  - > The role of NACAP and its implementation (led by CHRAJ).
  - > Public service delivery and anti-corruption (led by STAR-Ghana).
  - > Environmental Governance and anti-corruption, (led by EPA).
  - > Law Enforcement and anti-corruption, (led by the Ghana Police Service).

In the period under review, the Public Education Working Group was co-chaired by the GPS and was instrumental for the GPS to collect critical input from relevant stakeholders and identify possible partnerships and shared strategies.

### *Outlook*

119. Approval of the Points to Prove document must be pursued more vigorously in order to get feedback from the OAG. The CU has continually engaged the DPP to ensure that the OAG endorses the document to be rolled out as a tool to guide police prosecutions. Also, it is critical to provide training on pre-trial disclosure as a result of the demands of the *Rep v. Baffoe Bonnie and 4 others*, which will need to be provided to the police prosecutors and investigators.
120. ARAP is considering the use of its IT service providers to develop the PPSB electronic platform, considering the fact that ARAP is unable to influence the tool developed by Vas Intel as there was no contract between ARAP and Vas Intel at the commencement of the tool development.
121. In terms of public education, there is a clear commitment and engagement on behalf of the Public Affairs Directorate (PAD) to collaborate with ARAP to enhance accountability and improve public confidence in the GPS. This will take place through capacity development for the PAD, Police Training School and Police Academy. This work stream foresees the hardwiring of communications, ethics and anti-corruption within the very core of the GPS, ensuring new cadets and existing officers throughout the different ranks understand key communication principles and procedures.
122. Building on the successful Ghana Police Watch television show, ARAP will be supporting the GPS to develop a radio spin-off of the programme. The radio adaptation foresees a shorter version to the TV programme, in local languages, to be aired by local radio stations, and engaging local police stations with an exclusive focus on professionalism, ethics and anti-corruption. This is a unique opportunity for both ARAP and the GPS to generate a public debate on police ethics and professionalism, transcending the big cities and driving it to the reality of districts in harder to reach areas.

## Office of the Attorney General (OAG)

123. Article 88 of the 1992 Constitution of Ghana creates the Office of the Attorney General (OAG) as the principal legal advisor to Government. The OAG exists to oversee an efficient and transparent legal system, and helps ensure that all citizens have equality of access to justice. This position of duty means that any proceedings against the State can be brought against the Attorney General as the Defendant.
124. ARAP supports the OAG by providing technical assistance and capacity development, equipping it with key tools to effectively conduct prosecutions throughout the country. Dialogue with the Department of Public Prosecutions (DPP) in particular has resulted in three main areas of ARAP collaboration: information management (particularly case registry); prosecution capacity development (particularly corruption cases); and inter-agency coordination with other prosecution and investigation agencies. The recent Supreme Court decision in the Republic v. Baffoe Bonnie and 4 others on the obligation of the prosecution to engage in pre-trial disclosures has necessitated support of ARAP to train Attorneys of the OAG to fully appreciate their obligations to disclose evidence to accused persons.

## Interventions

125. Following the decision of the Supreme Court in the Rep. v. Baffoe Bonnie and 4 other, the Office of the Chief Justice issued Practice Directions on Disclosures in criminal trials. In September 2018, ARAP supported OAG to develop Guidelines on Disclosure. The Guidelines on Disclosure have been approved by the Attorney General and are available for the use of State Attorneys and Police Prosecutors as well as other prosecution agencies and the LAC.
126. ARAP supported the OAG to develop an electronic case management system to improve record keeping and work flow between staff of the DPP (AG06/06). Following the completion of the Docket Registry System, all registry staff of the OAG were provided with training (AG06/03) and with the necessary equipment provided to all 10 regional offices of the OAG for running the system (AG06/04). Development of the Case Management System is thus complete and operational, which has informed a request from the OAG for ARAP for possible further support to the Civil Division of the OAG during 2019.
127. A draft Manual for Environmental Offence prosecutions has been developed and is pending finalisation (AG05/05). The Manual will be useful for the Office of the DPP, the EPA and Police Prosecutors.

## Findings

128. As the Office with the constitutional mandate to prosecute all criminal offences, the burden to disclose evidence to accused persons falls on the prosecutors from the Office of the Attorney General and Police Prosecutors. The Office of the Attorney General, particularly the Office of the DPP will support the prosecutors (State Attorneys and Police Prosecutors) as the DPP works with ARAP to build capacity of the prosecutors to respond adequately to their disclosure obligations.

129. The Guidelines for Prosecutors and Investigators (Points to Prove) has been with the Office of the Attorney General for approval so the Police Prosecutors can understand the various points to prove in prosecutions. It is important to this process to be expedited. The target should be to complete this by the end of the first quarter of 2019.

### *Outlook*

130. The decision of the Supreme Court in the Rep. Baffoe Bonnie and 4 others (pre-trial disclosures) has far reaching implications for practices in criminal administration in Ghana. Having developed Guidelines with the support of ARAP to streamline the discharge of its disclosure obligations, support will be provided to the OAG to train its prosecutors during 2019. OAG are also anticipated to play a lead role in coordinating the provision of training on disclosures to all other prosecuting agencies (including GPS, EOCO, EPA, and potentially the Office of the Special Prosecutor), Police and EOCO investigators, the Judiciary and Judicial Service, and the LAC. This role will be further elaborated in consultation with the OAG during early 2019.

131. As the main constitutional body with the authority to prosecute criminal cases including corruption, capacity building of the State Attorneys regarding the prosecution of corruption cases will be an area of strong focus for the rest of the ARAP period. This training will also cover the recovery of proceeds of crime (assets recovery and forfeiture).

132. ARAP will provide support to the OAG to finalise the Manual on the Prosecution of Environmental Crimes. After the finalisation of the Manual, training will be provided to State Attorneys responsible for prosecuting environmental crimes. Avenues for coordination and experience sharing between the State Attorneys and Legal Officers of the EPA, who also have the mandate to prosecute environmental crimes, will be created.

133. The electronic platforms for the management of cases of the DPP will be updated to ensure its optimum use. An update will allow the use of the platform for the effective management of cases and monitoring of attorneys. The platform will also be expanded to cover the OAG's Civil Division.

### **Judiciary and Judicial Service**

134. The activities of the Judiciary and Judicial Service during 2018 focused mainly on support to the expansion of the Public Relations and Complaints Units (PRCUs) across the country. ARAP's approach has been to address both internal and external corruption and support to the PRCUs was a major line of work for the Judiciary and Judicial Service, with Judges and staff receiving capacity building in this area.

### *Interventions*

135. A major line of work for the Judiciary, the Web-Based Legal Library (JS04/02) which began in 2017 was continued and concluded in 2018. A pilot phase for the Web based Library will commence early 2019.

136. The validation workshop for the Judicial Capacity Needs Assessment on Adjudication of corruption cases (JS01/05) was also implemented in 2018. The recommendations from the validation workshop will inform further support to the judiciary in responding to the gaps identified. However, further progress was not made in this area of work as the Judiciary has not prioritised this area for support under the Programme.
137. Most of the activities in 2018 focused on the internal complaint management area of the Judicial Service's workplan. In line with this, the final PRCU Guidelines were printed and served as a basis for training newly assigned staff of the 10 regional office of the PRCUs nationwide (JS07/06). Following the training, a digital complaints management tool and PRCU public complaint online application was developed and handed over to the Judicial Service (JS/06/03). To support the work of the 10 offices, ARAP also provided equipment to all PRCU offices (JS06/02).
138. In an effort to contribute to the Anti-corruption and Transparency Week held in December 2018, the Judicial Service was supported to launch the online [Public Relation and Complaint Unit Application](#) (JS11/07). This was accompanied by a panel discussion with civil society and the GPS, deep diving in the current opportunities and challenges presented by digital tools in enhancing accountability and effectively bringing state institutions closer to citizens. To celebrate the launch of this digital service, a georeferenced map was developed as well as a short animated video explaining how to lodge complaints in [English](#), [Twi](#), [Housa](#), [Ewe](#) and [Ga](#).

### Findings

139. A key finding from the capacity needs assessment on corruption adjudication is that Judges require training on the adjudication of corruption related cases, although the Chief Justice expressed reservations as to whether Judges needed training in relation to the procedural rules in adjudicating corruption cases since these are unlikely to be different from those for the adjudication of other cases.
140. Training for Judges in the area of disclosure and the associated Practice Direction, witness statements and case management appear to be the areas of interest to the Judges. ARAP will provide further support to the Judiciary in this area in 2019.
141. The Judicial Service invited the Council for Law Reporting to participate in the development of the Web-Based Legal Library as the Council for Law Reporting possess some of the critical material the Judicial Service needs for the Library. An official invitation has been extended to the Council for Law Reporting and, following the signing of a memorandum of understanding between the two organisations, equipment and related support will be rolled out in 2019 to support the Library.
142. While the digitalisation of the services provided by the PRCUs was a well-received innovation, it remains a relatively new area of the Judicial Service's operations. Positive strides have been taken to train judges and staff to ensure ownership of the tool and effective functioning of the back end. Initial communication and public education support has also been provided with the development of the animated videos, posters and flyers.

## Outlook

143. The decision of the Supreme Court in the Rep. Baffoe Bonnie and 4 others regarding obligations of the prosecution to make pre-trial disclosures has far reaching implications for the criminal justice administration in Ghana. In November 2018, the Chief Justice issued a Practice Direction to Judges on how to handle the process of disclosure and associated case management issues. ARAP will continue to provide support to the Judicial Service and the Judicial Training Institute to train Judges on the disclosure requirements and the Practice Direction.
144. The manual for the adjudication of environmental crimes will be finalised in the first quarter of 2019. Thereafter, training will be provided to Judges to better adjudicate environmental related offences.
145. ARAP will provide further support to establish the Web-Based Legal Library. The software development for the Library has been finalised and pending deployment. A key activity for the Library is the training of focal persons for the Library (Registrars of courts in Accra and the Supreme Court Librarian or their appointee). The launch of the pilot phase of the Web-based Library will be undertaken in the first quarter of 2019. There will be sensitisation of all Judges in Accra on the Library and training will also be provided to the Regional Administrative Officers and ICT officers during the roll-out phase to be able to provide user support to Judges and other users of the Library in their regions.
146. With regards to the further support to PRCUs, public education is needed to raise their profile. ARAP will provide communication, public education and outreach support to ensure that citizens are aware of and understand the role and functions of PRCUs. To support the PRCUs in developing and delivering targeted communication and public education interventions, ARAP has commissioned research to document the knowledge, attitudes and perceptions of citizens with regards to the Judiciary and identify structural bottlenecks hindering citizen access to courts and PRCUs. The insights emerging from this research will constitute a useful baseline to measure the impact of targeted public education.

## Economic and Organised Crime Office (EOCO)

147. As a key stakeholder of the ARAP programme, the CU has maintained a close collaboration with EOCO over the last year. EOCO has been receiving direct support from the DfID Programme Strengthening Transparency, Accountability and Anti-Corruption Programme (STAAC). In an effort to ensure harmonization between Development Partner's efforts, and avoid duplication, ARAP did not implement any major activities with EOCO in 2018. Nonetheless, with STAAC phasing out in 2019, the CU started exploring the possibility of extending support to EOCO.

## Interventions

148. Although there were no specific activities implemented in the period under review, EOCO participated in two activities in the year. These included the Public Education Working Group Workshop focusing on coordinating public education around law enforcement, and the disclosure guidelines workshop led by the Office of the Attorney General.

### *Findings*

149. As the public education workshop was led by the Ghana Police Service, it was relevant for all stakeholders especially those in the area of anti-corruption enforcement such as EOCO to coordinate around issues of public education. A platform was created to support regular exchanges between stakeholders on public education and this is a useful resource for the public education department of EOCO as it is keen to re-vamp its communication and public education.
150. On the area of public education, the CU engaged closely with the Public Affairs Department of EOCO to explore possible areas to open up a line of work in the area of public education, with activities scheduled for the first quarter of 2019.

### *Outlook*

151. The Coordination Unit will continue working with EOCO and its Public Affairs Department (formerly called Public Education Department) to continue strengthening its digital communication and outreach, while also enhancing EOCO's coordination and public education efforts with other public and civic education providers.

### **Coordination Unit**

152. As the Programme evolved over the past two years, the coordination role of the ARAP Coordination Unit (CU) has been strengthened and moved beyond the organisation of Steering Committee and joint stakeholder meetings to encouraging a deeper engagement with stakeholders and coordinating activities.
153. As the Programme has expanded across the country with beneficiaries in the district and regional levels, the engagement of the CU with stakeholders has deepened to include district offices and local programmes of ARAP stakeholders. In the past year, two field trips were organised to engage with selected ARAP stakeholders and beneficiaries. This has offered more opportunities for EU visibility and a chance for the CU to experience and appreciate challenges first-hand in order to inform its strategies and support to beneficiaries.
154. The first field visit aimed to engage key actors within the small-scale sector mining in the Upper Denkyira East District on the proposed compliance monitoring area of EPA's support. During the field visits, the team visited selected concession sites of small-scale miners, providing the opportunity for the team to appreciate some of the challenges that face EPA in effectively carrying out compliance monitoring activities. This observation greatly influenced the decision to provide the EPA with drones to support its compliance monitoring activities. The field visit also highlighted critical public education needs in line with the permitting conditions of small-scale miners, thus offering Programme staff first-hand information to inform the support to EPA under ARAP.
155. The field visit organised in the last quarter of 2018 (FIIAPP08/02) provided the platform for the CU and EUD team to engage with beneficiaries across the country and to harness linkages and

collaboration with STAR Ghana. This is key to enhancing coordination and results across the Programme. The field trip report highlights some areas of further exploration and engagement, including a deeper focus on rule of law within the LAC. This will include supporting the development of a paralegal system as a stop gap measure to deal with challenges of staffing and access to justice. The need for equipment was also highlighted within various stakeholder institutions. The role of civil society in supporting some interventions of state institutions will also be explored further as the program strengthens its collaboration with STAR Ghana.

### *Outlook*

156. In the final 2 years of the programme, it is foreseen that the CU will continue strengthening its coordination and policy role. In this regards, it will continue bringing stakeholders together to share challenges, lessons learned and best practices in their implementation on diverse interventions in the area of anti-corruption, accountability and rule of law. As the ARAP supported interventions are being firmed up, the programme will deepen its engagement with institutional actors beyond its direct and indirect stakeholders (e.g.; Parliament, Ministry of Interior, MMDAs, National Media Commission, etc.). This is key to ensuring that the innovations and linkages are strengthened and outlive the programme.

## **3.5. Planned Activities that could not be implemented**

157. Most of the planned activities of stakeholders were implemented during 2018, with the exception of some activities from the GPS, CHRAJ and JS. The reasons for this range from shifting priorities to the low response of some stakeholders, and in some cases, changes in the leadership of stakeholder institutions. Fewer activities were left outstanding compared to the situation last year and there has thus been comparatively better progress in activity implementation during the year under review.
158. Until 2018, the engagement with CHRAJ's Public Education Department had been limited, primarily due to the retirement of the former Director. This resulted in the activities relating to public education not being further defined to inform implementation. Nonetheless, in the last quarter of 2018, a new Director was appointed and dialogue has resumed leading to the agreement of a set of activities and capacity development of the Department to be rolled out in 2019.
159. In the area of NACAP implementation, there remain four outstanding activities that were not implemented. This was due to low engagement and response on the part of CHRAJ on planned activities. Most of these outstanding activities will be prioritised for implementation in 2019. However, the relationship with CHRAJ remains a challenging one and a significant barrier to the effective collaboration and implementation of activities in a result-oriented manner.
160. Activities related to enhancing the capacity of Judges to deal with corruption cases were not implemented in 2018. Following the validation of the capacity needs assessment of Judges to deal

with corruption, the Judicial Service and Judiciary had not agreed on concrete steps to implement the recommendation of the report. The PRCU digital reporting tool was launched in the fourth quarter of the year, which resulted in a delay of the public education activities promoting PRCUs. Although some progress has been made in collaborating with the head of the PRCUs and using social media to disseminate information on the PRCU's, it is important for the Communications Department to take the lead in public education activities. In this regard, ARAP has taken steps to ensure collaboration and the appointment of a dedicated focal point within the Communications Department.

161. Planned capacity development activities within the OAG were not developed during 2018. Instead, and due to the Supreme Court 'disclosure' ruling in June 2018, the key capacity development for the OAG focused on disclosure and the Practice Direction issued by the Chief Justice. The ARAP CU will engage the OAG further to plan for the implementation of other capacity development activities in 2019.
162. Within the GPS, the two key activities that were not implemented fall in the area of internal control mechanism and those focused on the strengthening of Police Prosecutors. Both areas experienced changes in leadership over the year that made following up activities difficult. In the line of action on enhancing professionalism of Police Prosecutors, there was no action taken on the activity, "*Capacity Development Plan for Prosecutors Prosecuting Corruption Cases*". The "*Formulation of Police Officer's Professional Development Plan*" was also not implemented due to lack of response from the GPS on the activity. After several engagements with the top leadership of the GPS, it appeared that the priorities of the Police had shifted in some areas and, hence, these activities were not pursued further. The activities will be re-assessed in the final Programme planning in 2019.
163. Over the past year and following the receipt of the NCCE Grant, direct ARAP CU support to the NCCE was reassessed, with priority given to providing support - when requested - predominantly in the form of technical assistance to support NCCE activities.
164. The EPA had the highest number of activities implemented in 2018, although some planned activities were not undertaken due to reconsideration of appropriate sequencing of activities and EPA's evolving priorities. Outstanding activities mainly related to complaints management. Because the EPA has adopted a slightly different strategy to implementing activities in this area, some activities needed to be implemented before the digitisation of complaint management systems was possible. For example, resolution of jurisdictional differences by different agencies about who is responsible for complaints, activities relating to public education about what constitutes an environmental complaint, how to complain, and how the EPA should prioritise complaints received are all necessary before a new complaints management system can be adopted.
165. Following the assessment of the activities under the public education area of the EPA workplan, the CU and EPA agreed to re-focus proposed activities to relate directly to the two major lines of action on Complaint Management and Compliance Monitoring. Hence, implementation of activities in the area of public education will begin in 2019 after the two areas are well established.

### 3.6. Monitoring and Evaluation Framework.

166. As foreseen in the ARAP Monitoring and Evaluation (M&E) Manual, ARAP's M&E Consultant conducted the 1st internal evaluation of the Programme during November and December 2018. The core objective of the internal evaluation was to assess the progress made by ARAP by reviewing the current status of performance against the output indicators.
167. The internal evaluation was conducted by comparing the baseline of the indicators with the end of 2018 actual values (for those cases when collecting an actual value for end of 2018 was foreseen in ARAP's M&E Framework) (see Annex 4). The collected data was verified and triangulated with Programme experts and stakeholders. For those indicators where it was not possible to gather 2018 data, or a value was not foreseen until December 2017, the Consultant gathered the 2017 values in order to illustrate the trend.
168. Approximately 45% of the performance targets for the output indicators were met, which indicates a good level of implementation but suggests that more could have been done to perform better in some areas.

### 3.7. Communication and Visibility

169. During the period under review, the CU ensured that communication and visibility was effectively mainstreamed throughout the Programme. All activities undertaken by ARAP were fully equipped with visibility materials in accordance with EU guidelines and in accordance to the Programme's Communication and Visibility plan. In this regard the Programme has produced a broad range of materials including banners, stickers, folders, notebooks, pens, USB drives and calendars.
170. In 2018, the Programme saw a significant increase in its digital presence with the launch of its own website and Facebook page (in addition to the already existing Twitter and Flickr accounts). The Programme produced a range of multimedia materials to raise the visibility of the Programme in the digital space, including an 11-episode web series (three minutes per episode) called "In The Field" and outlining its work on environmental governance; a [short animated video](#) for the "Changing Lives" EU competition; and a range of Graphics Interchange Format 'videos' (commonly known as [GIFs](#)) for social media.
171. The launch of the ARAP website was an important step for ARAP's public communications during 2018, where key information about the Programme is made accessible to the general public. Details about ARAP's lines of work, activities and all stakeholders are now more easily available, including the Programme calendar, news articles and multimedia products showcasing our work. The National Anti-Corruption Week saw a boost in visitors to the website, with four times more users than the previous week, over 86% of whom were new (first time) visitors. There were also more than double the number of page views during the National Anti-Corruption Week, and nearly triple the number of actively engaged website users compared to the previous week.

172. The ARAP Twitter account has played a central role in maintaining ongoing and updated information about the Programme's activities for public audiences. It is an excellent means of ensuring engagement, conversation and support between anti-corruption stakeholders at national, regional and international levels. This platform was used to share ARAP's material, as well as content generated by other anti-corruption stakeholders and partners as part of the #UnitedAgainstCorruption movement. ARAP's Twitter following grew throughout the year, ending 2018 with 253 followers, 4,969 profile visits, and almost 500 interactions.
173. The increased activity generated during the National Anti-Corruption Week was particularly due to the heightened conversation and engagement from the events organised in Accra and throughout the country, and ARAP's new multimedia assets showcasing the Programme's work in a more visual and accessible way. This was a key moment to connect with stakeholders internationally, with there being more focus on the issue around the International Anti-Corruption Day celebrations. For example, during that week, the 69 tweets published generated 17,700 impressions.
174. ARAP's Facebook page was active for nearly half of 2018, increasing the means by which updated information about the Programme's work can be accessed. Just as with Twitter, Facebook allows ARAP to remain engaged online with national, regional and international anti-corruption actors, including wider audiences among the general public. There were over double the number of posts between the third and fourth quarters, which increased the numbers of followers from 125 to 224 and increased the total engagement by Facebook users from approximately 100 in the third quarter to over 5,700 in the fourth quarter. The increase in activity, new content and engagement during National Anti-Corruption Week also earned ARAP more followers and interaction through its Facebook page.

## 4. The way ahead

175. ARAP is made up of three key components: firstly, support to key justice sector institutions to deliver on accountability and anti-corruption from the supply side. This is managed by FIIAPP and includes support to CHRAJ, OAGI, the Judiciary and the Judicial Service, the GPS, LAC, EOCO and the EPA. Secondly, EU support is provided for capacity building for the demand side of accountability within the context of ARAP, managed by STAR Ghana. Taking into account the crucial role of public education as a key factor in engendering systemic and attitudinal change regarding accountability and anti-corruption, the third component of ARAP is focused on public education, managed by the NCCE. To build on the gains of all three components, the CU plans to strengthen the coordination and interconnection between all three components of ARAP with a view to learning lessons from each other and creating synergies.
176. As the program goes forward, support will increasingly be provided to the stakeholders that understand, value and capitalize on ARAP's support taking into consideration the structure of the programme and its implementation design.
177. Gender mainstreaming is a key target for ARAP. Initial assessments of the level of mainstreaming of gender at the national level reveals that a National Gender Policy developed in 2015 is available for institutions to adapt and implement. The CU intends to place greater emphasis on the gender components of all its support to stakeholders with a view to appropriately providing needed support to mainstream gender.
178. Systematic and enduring change in development work is achieved when interventions are targeted at the policy level. In this light, focus on supporting key stakeholders to examine existing policies and propose new ones will receive greater attention during the remainder of the Programme. Possible areas of policy-level work include examination of the regime for asset recovery and restitution in criminal trials; the role of paralegals within the context of the legal aid policy of Ghana; and, for the judiciary, a review of the system of jury trials and possible policy interventions that may foster adherence to the rule of law.
179. After the later start for environmental governance activities – planning commencing in 2017 and implementation in 2018 – there are now lines of work focused on compliance, complaints, digitalisation of the permit system, and support for the prosecution of environmental breaches. All of these areas have activities planned for 2019-2020. Connected to all of the activities will be public education around improving the accountability of government institutions for their management of the environment.

180. The approach adopted by the Programme regarding public education has been to hardwire public education efforts to processes of institutional reform. In this regard, most – if not all – the processes of institutional reform supported so far foresee increased support to public education. This will enable institutions to stimulate demand of new services developed, such as PRCUs, Compliance Monitoring and Complaints Management with EPA, the newly established Legal Aid Commission, and the GPS / PPSB complaints management platform. Coordination, alignment and information sharing across all these different efforts will continue to take place through the Public Education Working Group.
181. Discussions have started with CHRAJ about the possibility of CHRAJ hosting an international anti-corruption conference during 2020. Although initial discussions focused only on anti-corruption, CHRAJ has suggested that the conference be broadened to include all three areas covered by ARAP – anti-corruption, accountability and rule of law. These discussions will continue during early 2019, with the conference expected to take place after mid-2020. It is envisaged that the conference will raise the visibility of ARAP, highlight its achievements, and provide a fitting ‘send-off’ for the Programme.
182. ARAP has identified the possibility of allocating a budget for experience exchange activities. During 2019, the Programme will begin to concretize what visits might be undertaken, prioritizing those that are issue-oriented and involve multi-stakeholders over those that may only benefit one or two people in a particular organization. A plan for what visits to undertake will be developed in the first half of 2019, with visits to be conducted in the second half of 2019 and the first half of 2020.

# Annexes

- I. Account for the year (retrospective)
  - 1. Activities implemented in 2018: Schedule and Activities description.
  - 2. ARAP 2018 in images
- II. Planning for the future (prospective)
  - 3. Draft Work Plan for 2019-2020
  - 4. ARAP Monitoring Framework



**ARAP**  
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Anti-Corruption Programme

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