



**REPUBLIC OF GHANA**

**NATIONAL  
ANTI-CORRUPTION  
ACTION PLAN  
(NACAP)**

**PROGRESS REPORT  
(January-December 2016)**



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**Richard Quayson**

Dep. Commissioner, CHRAJ, and Chair of MONICOM



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### III. LIST OF ACRONYMS

ACA	Anti-Corruption Agency
ADISS	Accountable Democratic Institutions and Systems Strengthening
AdMA	Adentan Municipal Assembly
A-G	Attorney-General
ALAC	Advocacy and Legal Advice Centre
AMA	Accra Metropolitan Assembly
AML	Anti-Money Laundering
AMLROs	Anti-Money Laundering Reporting Officers
APNAC	African Parliamentarians Network Against Corruption
APR	Annual Progress Report
ARIC	Audit Report Implementation Committee
ASDA	Akwapim South District Assembly
ATU	Accra Technical University
AU	African Union
AuG	Auditor-General
AWP	Annual Work Plan
BIF	Business Integrity Forum
BNI	Bureau of National Investigation
BoG	Bank of Ghana
CAGD	Controller and Accountant General's Department
CCTV	Closed-circuit Television
CDD	Centre for Democratic Development
CEO	Chief Executive Officer
CFT	Countering the Financing of Terrorism
CHRAJ	Commission on Human Rights and Administrative Justice
CSOs	Civil Society Organisations
DANIDA	Danish International Development Agency
DFID	Department for International Development
DNFBP	Designated Non-Financial Businesses and Professions
DPP	Director for Public Prosecution
DPs	Development Partners
DVLA	Driver and Vehicle Licensing Authority
EC	Electoral Commission
ECDS	Electronic Case Distribution System
ECOWAS	Economic Community of West African States
EITI	Extractive Industry Transparency Initiative

EnC	Energy Commission
EOCO	Economic and Organised Crime Office
EPA	Environmental Protection Agency
ETC	Entity Tender Committee
FAA	Financial Administration Act
FBOs	Faith-Based Organisations
FIC	Financial Intelligence Centre
FWSC	Fair Wages and Salaries Commission
GACC	Ghana Anti-Corruption Coalition
GAF	Ghana Armed Forces
GARCC	Greater Accra Regional Coordinating Council
GAS	Ghana Audit Service
GES	Ghana Education Service
GGSD	Ghana Geological Survey Department
GHS	Ghana Health Service
GIFEC	Ghana Investment Fund for Electronic Communication
GII	Ghana Integrity Initiative
GIPC	Ghana Investment Promotion Centre
GJA	Ghana Journalists Association
GNPC	Ghana National Petroleum Company
GP	Ghana Police Service
GPS	Ghana Prisons Service
GRA	Ghana Revenue Authority
GTA	Ghana Tourism Authority
GYEEDA	Ghana Youth Employment Entrepreneurial Development Agency
HiLIC	High Level Implementation Committee
IAA	Internal Audit Agency
ICT	Information Communication Technology
IEA	Institute of Economic Affairs
IGP	Inspector-General of Police
IPR	Institute of Public Relations
IPs	Implementing Partners
ISD	Information Services Department
ITC	International Training Course
JS	Judicial Service
JTI	Judicial Training Institute
JUSAG	Judicial Staff Association of Ghana
LANets	Local Accountability Networks
LEKMA	Ledzokuku Krowor Municipal Assembly
M&E	Monitoring & Evaluation
MDAs	Ministries, Departments and Agencies
MELR	Ministry of Labour and Employment Relations
MinPet	Ministry of Petroleum
MLGRD	Ministry of Local Government and Rural Development

MMDA	Metropolitan, Municipal, District Assembly
MoCs	Ministry of Communications
MoD	Ministry of Defence
MoF	Ministry of Finance
MoFRI	Ministry of Foreign Affairs & Regional Integration
MoGCSP	Ministry of Gender, Children and Social Protection
MoI	Ministry of Information
MOJAGD	Ministry of Justice and Attorney-General's Department
MONICOM	Monitoring & Evaluation Committee
MoP	Ministry of Power
MoRH	Ministry of Roads & Highways
MoU	Memorandum of Understanding
MPs	Member of Parliament
NABTEX	National Board for Professional & Technical Examinations
NACAP	National Anti-Corruption Action Plan
NACOB	Narcotics Control Board
NAFTI	National Film & Television Institute
NCA	National Communications Authority
NCCE	National Commission for Civic Education
NDPC	National Development Planning Commission
NEAC	National Ethics Advisory Committee
NEDco	Northern Electricity Distribution Company
NHA	National Health Accounts
NHIA	National Health Insurance Authority
NHIS	National Health Insurance Scheme
NIA	National Identification Authority
NISU	NACAP Implementation Support Unit
NITA	National Information Technology Agency
NLC	National Labour Commission
NMC	National Media Commission
NPRA	National Pensions Regulatory Authority
NSS	National Service Secretariat
NVTI	National Vocational Training Institute
NYEP	National Youth Employment Programme
OHCS	Office of the Head of Civil Service
OOP	Office of the President
PAC	Public Accounts Committee
PEF	Private Enterprise Federation
PESU	Professional Ethics Standards Unit
PFM	Public Financial Management
PIPSB	Police Intelligence and Professional Standards Bureau
PPA	Public Procurement Authority
PRAAD	Public Records and Archives Administration Department
PSC	Public Services Commission

PSIP	Public Service Integrity Programme
PSO	Public Service Organisation
PSRS	Public Sector Reform Secretariat
PURC	Public Utilities Regulatory Commission
RCC	Regional Co-ordinating Council
SADA	Savannah Accelerated Development Authority
SEC	State Enterprises Commission
SEND	Social Enterprise Development Foundation
UN	United Nations
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Programme
VRA	Volta River Authority
WAEC	West African Examination Council

## **IV. EXECUTIVE SUMMARY**

### **Introduction and Background**

One of the major strategies initiated by the Government of Ghana to address corruption is the adoption of the ten-year National Anti-Corruption Action Plan (NACAP). NACAP is an operational document that reflects Ghana's strategic approach towards tackling corruption as a systemic problem rather than a problem of individuals. Thus the NACAP was developed based on well-guarded consultations and consensus building process reached among key stakeholders from the public and private sectors, anti-corruption organisations and civil society organizations (CSOs). The Plan was unanimously adopted by Parliament on 3<sup>rd</sup> July, 2014. This is the second annual report since the implementation of the NACAP in 2015.

This report represents progress of implementation of the NACAP by Implementing Partners (IPs) for the period January – December 2016. It is an account of the responsibility reposed on the Commission on Human Rights and Administrative Justice (CHRAJ), National Development Planning Commission (NDPC) and Monitoring & Evaluation Committee (MONICOM) to monitor and track the progress of implementation of NACAP and present annual reports on same.

### **Structure of the Report**

The report is presented in four sections. The first section is the introduction and background to NACAP, including the vision, mission, scope and its strategic objectives. The second section covers the institutional and implementation arrangements. Section Three presents preparatory activities undertaken to facilitate implementation and reporting, as well as the status of implementation of the four strategic objectives by Implementing Partners (IPs). Section Four discusses challenges encountered during the implementation, draws conclusions and makes recommendations for effective implementation of the NACAP.

### **Institutional and Implementation Arrangements**

To ensure effective and efficient implementation of the NACAP, institutional and implementation arrangements were established. These include the following:

- (a) The High-Level Implementation Committee (HiLIC) - the highest policy body, which is chaired by the Chief of Staff;
- (b) The Monitoring and Evaluation Committee (MONICOM) - performs the Monitoring and Evaluation (M&E) functions of NACAP. It is chaired by CHRAJ, and drawn from CHRAJ, NDPC, Public Services Commission (PSC), State Enterprises Commission (SEC), Private Enterprise Federation (PEF), and Ghana Anti-Corruption Coalition (GACC);
- (c) CHRAJ is the coordinating institution for the implementation of NACAP. To assist with its coordinating role, CHRAJ has established the NACAP Implementation Support Unit (NISU) to serve as the NACAP secretariat, and provide administrative support to HiLIC, MONICOM and the IPs; and
- (d) The IPs are all the identified key public, private bodies and CSOs as well as individuals whose involvement is critical for the effective implementation of NACAP.

### **Implementation of 2016 NACAP Work Plan**

Several preparatory activities were undertaken to provide the requisite foundation to start the implementation of the 2016 Annual Work Plan (AWP). The 2015 reporting tool was revised to include additional features as indicated below:

- (a) “Broad Activity” and “Specific Activity” to facilitate the collection of comprehensive data for more holistic reporting by IPs.
- (b) Development and adoption of general guidelines, including the identification of general and specific roles relating to performance reporting by IPs.

The NACAP has 143 broad activities for the 10-year period. The 2016 AWP was built around 86 broad activities, which are further divided into 122 specific activities, and grouped under “General Roles” and “Specific Objectives” respectively, with 132 performance indicators. This was a significant improvement over the 2015 AWP, which had 57 broad activities and 57 performance indicators.

The time-frame for implementation of activities under NACAP are grouped into Short-Term, Medium-Term and Long-Term activities. It is worth noting that the last batch of all the short-term activities for the ten-year period has been captured for implementation in the 2017 data collection Tool.

One hundred and eight (108) MDAs were directly served with hard copies of the 2016 AWP and M&E reporting tool, while eleven (11) others were presented with the electronic copies. Electronic copies were also sent to the Regional Coordinating Councils (RCCs) for transmission to the 216 Metropolitan, Municipal, District Assemblies (MMDAs) in the respective regions. In all, for the 2016 reporting year, 325 IPs were served with the reporting tool. This represents a much higher coverage compared to forty-three IPs who were involved in the implementation of



the activities of the 2015 Work Plan. The 2016 tool was hosted on CHRAJ's website, and a notice of the availability of the reporting tool was published in both the Daily Graphic and Ghanaian Times newspapers on 30th May 2016.

For the year 2016, CHRAJ received reports from 56 IPs compared to 19 in 2015. It is worthy to note that, all 56 IPs who submitted reports on the implementation of NACAP for 2016 also reported on the general roles.

### **Implementation of Strategic Objectives<sup>1</sup>**

Under the General Roles:

- (a) Thirteen (13) IPs specifically reported budgeting for the implementation of NACAP compared to one in the previous year;
- (b) Thirty-four (34) IPs reported having designated officers as focal persons to handle specific roles assigned them by NACAP in their respective organisations;
- (c) Thirty-six (36) IPs reported having organised various sensitization programmes on NACAP for about 2,749 staff members across the country on NACAP compared to four (4) IPs who organised for 1,705 in 2015;
- (d) Ten thousand, two hundred and fifty-nine (10,259) public education/awareness creation and campaign programmes were organised in total, compared to the 767 programmes in 2015;
- (e) Fifteen (15) IPs reported having organised training for ninety-eight (98) audit committee members in various public sector institutions compared to five (5) in 2015;
- (f) Thirty-four (34) IPs reported having complied with procurement processes;
- (g) Four (4) IPs reported receiving approximately 604 complaints of misconduct of which 506 investigations or actions were taken and 285 culprits were sanctioned;
- (h) Twenty-one (21) IPs reported having developed and published sexual harassment policies in their work places, and
- (i) Thirty (30) IPs reported taking pragmatic measures to control absenteeism, lateness and moonlighting.

### **Summary of Findings**

- i. Series of innovative measures were undertaken in awareness creation on NACAP, including the use of audio-visuals on social media platforms, public education centres, and production of radio jingles, etc.  
A targeted audience numbering over 40,306 from 2<sup>nd</sup> Cycle institutions, the public sector, FBOs, NGOs, media houses, electoral constituencies, the

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<sup>1</sup> Comparison could not be made on some activities because they are new roles introduced in 2016 Tool.

informal sector, and a listening audience of 4 radio stations benefited from public education/awareness creation and campaign programmes on NACAP and corruption in general.

- ii. Two Significant achievements were made in the anti-corruption legal framework, are the enactment of the Companies (Amendment) Act, 2016 (Act 920) and Public Financial Management Act, 2016 (Act 921) which provide for transparency of beneficial ownership information for the purposes of dealing with illicit money transfers, money-laundering and related crimes as well as public financial management.

## **Challenges**

Despite the achievement made in the period, challenges still exist. The number of IPs reporting on the implementation of NACAP was below expectation. Only four (4) MMDAs – LEKMA, AMA, AdMA and ASDA out of 216 reported. No private sector IP reported. Similarly, except the GII, GACC and CDD, no other civil society or faith-based organization reported in the period despite the intense preparatory activities undertaken to enhance implementation and reporting.

It was also observed that many IPs were reluctant or failed to provide numbers and figures required by the specific indicators. Some IPs only partially completed the reporting tool, and failed to provide reasons for not complying fully with the instructions in the reporting tool.

The absence of baseline data on the high-level key performance indicators for NACAP continues to pose challenges for tracking progress made from implementing NACAP.

## **Recommendations**

- i. Although the full reasons are not yet available for the low patronage by IPs, it is necessary to step up engagement with CSOs, FBOs, media and the Private Sector to play their respective roles in the implementation arrangement.
- ii. The development of a Communication Strategy has become more urgent than ever. CHRAJ must expedite action on same to serve as the mechanism for sensitising the public on the activities of NACAP and dissemination of the achievements and lessons learnt.
- iii. CHRAJ must be strengthened to respond effectively to the challenges faced by IPs in reporting appropriately.
- iv. Government should adequately resource CHRAJ to enable it support all IPs to implement NACAP.
- v. It is also recommended that MDAs and MMDAs budget adequately for the implementation of activities under the NACAP.

- vi. It is recommended that the baseline study, which has been outstanding since 2014, be carried out in the coming year.

### **Progress and Conclusions**

In spite of the many challenges that impeded the implementation of the NACAP in the reporting year, significant progress was made. Implementation of the Broad Activities under the NACAP grew from 57 in 2015 to 86 in 2016. IPs who reported increased from 19 to 56. Institutions who specifically made budgetary allocation to implement NACAP and fight corruption increased from 1 to 20.

Although the progress may not be epochal, it nonetheless reflects a growing interest and opportunity that must be properly harnessed by the Government and People of Ghana to bring corruption under control.



# **SECTION ONE: INTRODUCTION AND BACKGROUND**

## **1.1. Introduction**

CHRAJ was established to, investigate complaints of corruption, abuse of office by public officers, instances of alleged or suspected corruption and the misappropriation of public funds by public officials, and breaches of the Code of Conduct for public officers as provided under Chapter 24 of the 1992 Constitution of the Republic of Ghana (the Constitution), among others.

To deal with the canker of corruption, the National Anti-Corruption Action Plan (NACAP) was developed under the coordination of CHRAJ with funding support from the Danish International Development Agency (DANIDA). The 10-year Strategic Framework is an operational document that mirrors Ghana's efforts in mission, vision and strategy towards curbing corruption, and was developed through consultations and consensus reached among key stakeholders from the public and private sectors, anti-corruption organisations, CSOs and individuals. NACAP was finally adopted by the Parliament of Ghana in 2014.

This report represents an account of the responsibility imposed on CHRAJ, NDPC and MONICOM to monitor and track the progress of implementation of NACAP and present periodic and annual reports on same.

The report covers the period of 1<sup>st</sup> January to 31<sup>st</sup> December 2016. It comprises information provided by the IPs using a recommended monitoring and evaluation M&E framework (reporting Tool) for the period.

The report highlights progress made by Implementing Partners (IPs) towards the achievement of the strategic objectives of NACAP. It also presents the challenges encountered during the reporting period and proposes interventions in the form of recommendations to deal with the challenges.

## **1.2. Background**

In July 2009, the government entrusted CHRAJ with the responsibility of coordinating the development of a non-partisan strategy and plan for combating corruption in the

country. The CHRAJ, through a twenty-five (25) Member Multi-Stakeholder Working Group, developed a ten-year national strategy and plan to combat corruption called National Anti-Corruption Action Plan (NACAP), which was validated by implementing partners and other stakeholders at the Second National Integrity Conference in October 2011. NACAP was adopted unanimously by the Parliament of Ghana on 3<sup>rd</sup> July, 2014 as a non-partisan strategy and plan for implementation to fight corruption over the next ten years ending in December, 2024.

NACAP presents a holistic and comprehensive approach to combating corruption, building on lessons drawn from previous anti-corruption measures and integrating new perspectives, methods and tools in counter corruption programmes.

The CHRAJ in close collaboration with the NDPC are assigned the responsibility of coordinating and monitoring the implementation of NACAP through a MONICOM comprising ten (10) representatives. The institutions and organisations represented on MONICOM are CHRAJ, NDPC, PSC, SEC, PEF and GACC.

Corruption is generally understood as the misuse of entrusted power for private gain. It erodes the moral fabric of society and violates the social and economic rights of the citizens (especially the poor and the vulnerable), undermines democracy and the rule of law and erodes the quality of life of citizens. Corruption leads to violations of human rights, promotes political instability, undermines economic development and the ability of government to deal effectively with poverty, organised crime, terrorism and other threats to human security. Furthermore, corruption results in the loss of legitimacy and public confidence in systems and institutions and diminished respect for constituted authority.

Corruption is caused by many factors, direct and indirect in nature. Direct factors relate to the activities of the state while the indirect factors relate to the quality of the bureaucracies, level of public sector wages; the penal systems and institutional controls; level of transparency of the rules, laws and processes.

The main purpose of NACAP is to contextualise and mobilise efforts and resources of stakeholders, including government, public sector institutions, individuals, civil society, private sector and the media, to prevent and fight corruption through the promotion of high ethics and integrity and the vigorous enforcement of applicable laws.

**Vision:** The vision of NACAP is to create a sustainable democratic society founded on good governance and imbued with high ethics and integrity.

**Mission:** NACAP is adopted to contextualise and mobilise efforts and resources of stakeholders, including Government, individuals, civil society, private sector and the media, to prevent and fight corruption through the promotion of high ethics and integrity and the vigorous enforcement of applicable laws.

The strategic objectives of NACAP include the following:

1. Build public capacity to condemn and fight corruption and make its practice a high-risk, low-gain activity;
2. Institutionalise efficiency, accountability and transparency in the public, private and not-for profit sectors;
3. Engage individuals, media and CSOs in the report and combat of corruption, and
4. Conduct effective investigations and prosecution of corrupt conduct.

The scope of the NACAP goes beyond fighting corruption in the public sector. It targets the private sector and embraces the activities of state and non-state actors regardless of gender, age, local or international status. The NACAP adopts a long-term strategic perspective and utilises a three-prong approach to the fight against corruption, namely: (a) prevention (b) education and (c) investigation and enforcement.

Under NACAP, each stakeholder has been assigned roles under each of the strategic objectives, either as “lead” or “collaborating” implementer. The stakeholders are:

- The Executive;
- Public Sector institutions;
- Parliament;
- Judiciary;
- Anti-corruption and law enforcement agencies;
- Independent governance institutions;
- National Development Planning Commission;
- Media/Civil Society Organisations;
- Private sector;
- Traditional authorities/religious bodies;
- Political parties;
- Citizenry, and
- Development Partners.

The roles are to be implemented in a three category time-frame; the short term (2 years), medium term (5 years) and long term (10 years). The effective implementation of the NACAP should result in enhanced levels of integrity, reduced corruption, improved economic performance, and accelerated development of Ghana.





## **SECTION TWO: INSTITUTIONAL AND IMPLEMENTATION ARRANGEMENT**

To ensure effective and efficient implementation of the NACAP, institutional and implementation arrangements were established.

### **2.1. The High-Level Implementation Committee (HiLIC)**

The HiLIC is the highest Policy Body, chaired by the Chief of Staff, and consists of no more than twenty (25) members<sup>2</sup>, including CHRAJ as the Vice Chair, and Member/Secretary. Other members include representatives from:

- Office of the President (OoP);
- Parliament of Ghana;
- Ghana Audit Service (GAS);
- Public Services Commission (PSC);
- Internal Audit Agency (IAA);
- Economic and Organised Crime Office (EOCO);
- Ministry of Justice and Attorney-General's Department (MOJAGD);
- State Enterprises Commission (SEC);
- Ministry of Finance (MoF);
- Controller and Accountant General's Department (CAGD);
- Ghana Health Service (GHS);
- Ghana Education Service (GES);
- National Development Planning Commission (NDPC);
- Judicial Service;
- Ministry of Local Government and Rural Development (MLGRD);
- Ghana Police Service (GPS);
- Office of the Head of Civil Service (OHCS);
- Ministry of Information (Moi);
- Local Government Service;
- National Commission for Civic Education (NCCE);

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<sup>2</sup> The representatives are supposed to either be Heads of the institutions or personnel of the institutions at the senior management level.

- Private Enterprises Federation (PEF)<sup>3</sup> and
- Ghana Anti-Corruption Coalition (GACC)<sup>4</sup>.

The HiLIC is required to meet at least four times in a year to discharge the following responsibilities:

- ensure inclusiveness, local ownership and effective implementation of NACAP;
- provide policy and strategic direction and advice to implementing agencies/bodies for NACAP implementation;
- facilitate the integration of NACAP's programmes in agencies and organisations' annual programme of work;
- organise an annual forum to provide a platform for the public to engage stakeholders on anti-corruption efforts;
- facilitate continuous dialogue between Government and Stakeholders for the systematic and effective implementation of NACAP;
- facilitate mobilisation and timely release of financial resources for the implementation of NACAP, and
- review quarterly and annual reports on the achievements of the implementation of NACAP and ensure effective dissemination among implementing partners, and key stakeholders including Parliament, the Office of the President and the public.

## 2.2. Monitoring and Evaluation Committee

Monitoring and evaluation (M&E) of the NACAP forms the basis for systematic measurement of progress made in its implementation. The M&E activities would provide the requisite data/information to guide and inform decision-making regarding resource needs and allocation for the implementation of NACAP; for identification of challenges for review of implementation strategies and activities to ensure achievement of set targets, objectives, and ultimately the goals of NACAP; and sharing of lessons learnt.

The monitoring and evaluation function of the NACAP falls within the remit of the MONICOM, which consists of ten (10) members drawn from CHRAJ (3), NDPC (2), PSC (1), SEC (1), PEF (1), and GACC (2). The main responsibilities of MONICOM include the following:

- Facilitating the preparation of an M&E plan for NACAP's implementation;
- Assisting to develop, review and administer M&E instruments for the collection of data on the implementation of NACAP;

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<sup>3</sup> Representing the private sector.

<sup>4</sup> Representing CSOs

- Conducting periodic M&E on capacity building needs of implementing partners to enhance their knowledge and skills;
- Assisting in conducting action research to address emerging issues during the implementation of NACAP; and
- Preparing and disseminating performance results of the implementation of NACAP to key stakeholders and the public.

### **2.3. CHRAJ and NACAP Implementation Support Unit [NISU]**

CHRAJ is the Coordinating Body for the development and implementation of NACAP. However, it has established a NACAP Implementation Support Unit [NISU] that serves as the NACAP secretariat which provides administrative support to HiLIC, MONICOM and the IPs. More specifically, the responsibilities of NISU include the following:

- Preparing minutes of meetings and reports;
- Assisting in developing and administering data collection tools, and processing and analysing data collected from IPs;
- Receiving enquiries from public/implementing agencies on NACAP for processing by appropriate persons;
- Providing information to the public on NACAP; and,
- Organising meetings and other incidental activities.

### **2.4. Implementing Partners**

Another component of the institutional and implementation arrangements consists of the Implementation Partners (IPs). They include all the identified key public, private, CSOs<sup>5</sup> and individuals whose involvement is critical for the effective implementation of NACAP. They are responsible for ensuring that NACAP activities are incorporated and mainstreamed into their respective medium term development plans, annual work plans and activities for implementation. They are also to ensure that periodic monitoring is conducted to collect data/information in line with the data collection tools developed by MONICOM for use. The implementation partners are also required to organise capacity building activities for their staff to enable them to deliver on the objectives of NACAP as well as sensitise key stakeholders on their service charters.

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<sup>5</sup> Includes media, faith based organisations and civic groups.



## SECTION THREE: IMPLEMENTATION OF 2016 NACAP WORK PLAN

### 3.1. Preparatory Activities

A number of preparatory activities were undertaken to provide the requisite foundation for the commencement of the implementation of the 2016 Work Plan. These included the under-listed.

### 3.2. Revision of the 2015 Reporting Tool Outline

The 2015 Reporting Tool was reviewed to produce the 2016 Reporting Tool. The review included adding features such as “Broad Activity” and “Specific Activity” to facilitate the collection of comprehensive data for more holistic reporting by Implementing Partners. See Table 1.

Table 1: Outline of the 2016 Reporting Tool

Broad Activity	Specific Activity	Indicator for Specific Activity	Data Collection Period	Data Collection Method	Data Disaggregation	Implementing Agency		Result
						Lead	Collab.	

Several efforts were undertaken to facilitate the use of the Reporting Tool:

- The development and adoption of general guidelines, including the identification of general and specific roles relating to performance reporting by implementing partners;<sup>6</sup>
- A completed sample Reporting Tool to aid implementing partners;
- A notice of the availability of the Reporting Tool was published in the Daily Graphic and Ghanaian Times newspapers on 30th May 2016;
- The Reporting Tool was published on CHRAJ’s website ([www.chrajghana.com](http://www.chrajghana.com)) for implementing partners to access;

<sup>6</sup> The general roles are those to be implemented and reported by all implementing partners while the specific roles are to be implemented and reported under the four strategic objectives.

- A sensitisation workshop was organised for selected implementing partners;
- Hard and soft copies of the reporting tool were circulated to IPs through various means, and
- Targeted training of some IPs on NACAP generally and the use of the reporting tool on request.

### 3.3. Development of the 2016 Annual Work Plan

With the revised framework, CHRAJ then developed the 2016 Annual Work Plan (AWP) in collaboration with MONICOM and with the approval of HiLIC. The features of the AWP included the identification of the broad and specific activities under each strategic objective, performance indicators, lead and collaborating agencies, as outlined in the general guidelines. The detailed AWP is attached as Appendix 1.

The 2016 AWP was built around 86 broad activities under NACAP. One hundred and twenty-two specific activities were generated and grouped under “General Roles” and “Specific Objectives” respectively, with 132 performance indicators as captured in Table 2 below.

Table 2: Summary of Broad and Specific Activities and Indicators 2016

No.	NACAP Strategic Objectives	No. of Broad Activities	No. of Specific Activities	No. of Performance Indicators
1	Build capacity to condemn and fight corruption and make it a high risk, low gain activity	17	33	38
2	Institutionalise efficiency, accountability and transparency in public and private service	23	30	31
3	Engage individuals, media, and CSOs in reporting and combating corruption	14	24	23
4	Conduct effective investigations and prosecution for corrupt conduct	32	35	40
<b>Total</b>		<b>86</b>	<b>122</b>	<b>132</b>

### 3.4. Institutional Participation

One hundred and eight (108) IPs were directly served with printed copies of the tool, and eleven (11) other IPs were emailed soft copies. Electronic copies of the reporting tool were sent to the RCCs for transmission to the 216 MMDAs in the respective regions. In all, 325 IPs were served with the reporting tool, compared to 43 IPs who were involved in the implementation of the activities of the 2015 Work Plan. The 2016 tool was also placed on CHRAJ’s website and advertised in both the Daily Graphic and Ghanaian Times newspapers on 30th May 2016.

The Ministry of Local Government and Rural Development (MLGRD) partnered with CHRAJ to provide technical assistance to MMDAs in Central and Western regions in July-August, 2016. CHRAJ organised a sensitisation workshop for Focal Persons of 68 IPs. CHRAJ also provided technical support to other IPs who requested for assistance.

By the end of the reporting period, CHRAJ had received reports from fifty-six (56) implementing partners (see Appendix 2). The consolidated responses from the 56 IPs are attached as Appendix 3.

### 3.5. Coordination Challenges

- (1) Participation of MDAs and MMDAs in the implementation of NACAP was low inspite of an increase in the number of participating institutions in 2016. Out of the 325 IPs served with AWP, CHRAJ received reports from only 56 IPs representing 17% of IPs served. The low outturn, especially within the public sector institutions, is very worrying.

### 3.6. Implementation of Strategic Objectives

#### 3.6.1. General Measures to Implement NACAP Programmes

General roles<sup>7</sup> to be implemented by all IPs were identified in the revision of the 2015 tool to capture contextual indicators that were not included in the activities under the four strategic objectives.

There are two (2) broad activities, nine (9) specific activities and twelve (12) indicators provided under the general role for implementation (See Table 3) below.

Table 3: Broad Activity, Specific Activity and Indicators under General Roles

S/No.	Broad Activity	Specific Activity	Indicator
1	Implement NACAP	Budget for implementation of NACAP	Number of implementing agencies budgeting for implementation of NACAP
		Designate officers as liaisons responsible for NACAP.	Liaison officers designated
		Sensitise staff on NACAP	Number of staff sensitised
		Report on implementation of NACAP.	Number of implementing agencies reporting on the implementation of NACAP

<sup>7</sup> The general roles are those to be implemented and reported by all implementing partners while the specific roles are to be implemented and reported under the four strategic objectives.

S/No.	Broad Activity	Specific Activity	Indicator
2	Take Measures to Prevent Corruption And Abuse of Office Within Public, Private and Not-For-Profit Organisations/ Institutions	Strengthen internal control measures to reduce opportunities for corruption.	Number of ARICs and other audit structures trained.
			Increased compliance with rules and regulations of procurement processes.
		Establish safe reporting systems/ mechanisms at work places.	Number of institutions with safe reporting systems/ mechanisms
		Act expeditiously on reports of corruption and misconduct in the work place.	Number of corruption complaints/ misconduct received.
			Number of investigations / actions undertaken on acts of corruption/ misconduct
			Number of prosecutions / sanctions undertaken
		Develop and publicise sexual harassment policies at the work place.	Sexual harassment policy developed and publicized at the work place.
Introduce measures to control absenteeism, lateness and moonlighting.	Measures to control absenteeism, lateness and moonlighting introduced.		

Over all, fifty-six (56) IPs submitted reports on the implementation of NACAP. This is a significant improvement over 2015, where only 19 IPs reported on the implementation of NACAP. It is noteworthy that all fifty-six (56) IPs who submitted reports on the implementation of NACAP for 2016 reported on all indicators under general roles as in Table 4.

Table 4: Indicators and Number of IPs Who Reported Implementation

S/No.	Indicator	Results
1	Budget for implementation of NACAP	20
2	Designation of liaison Officers	33
3	Number of IPs reporting on sensitization of staff on NACAP	36
4	Number of staff sensitized	2,749
5	Number of IPs reporting on the implementation of NACAP	56
6	Number of IPs reporting on organizing ARICs training	15
7	Number of ARICs trained	98
8	Number of implementing partners reporting on compliance with procurement processes	34
9	Number of implementing partners with safe internal reporting mechanisms	36
10	Number of implementing partners reporting on receiving complaints of corruption or misconduct	5



S/No.	Indicator	Results
11	Number of complaints of corruption or misconduct received	604
12	Number of Investigations/Actions taken on misconduct	506
13	Number of prosecutions/sanctions	285
14	Number of implementing partners reporting on developing and publicizing sexual harassment policies	15
15	Sexual harassment policy developed and publicized	21
16	Measures to control absenteeism, lateness and moonlighting introduced	30

Table 5: Comparative Performance on Selected Indicators under General Roles

No.	Indicator	Results (no. of IPs implementing)		Variance
		2015	2016	
1	Number of IPs reporting on the implementation of NACAP	19	56	37
2	Number of staff sensitized	1,705	2,749	1044
3	Number of ARICs trained	5	98	93

### i) Plan and Budget for Implementation of NACAP

Nineteen (19) IPs reported that they budgeted specifically for implementation of their NACAP activities. They include:

1. Public Sector Reform Secretariat (PSRS)
2. Ministry of Labour and Employment Relations (MELR)
3. Ghana Investment Fund for Electronic Communication (GIFEC)
4. National Vocational Training Institute (NVTI)
5. Centre for Democratic Development (CDD)
6. Economic and Organised Crimes Office (EOCO)
7. Securities Exchange Commission (SEC)
8. National Development Planning Commission (NDPC)
9. Commission on Human Rights and Administrative Justice (CHRAJ)
10. Savannah Accelerated Development Authority (SADA)
11. Public Records and Archives Administration Department (PRAAD)
12. NPRA
13. Ghana Investment Promotion Centre (GIPC)
14. MoGCSP
15. Financial Intelligence Centre (FIC)
16. Ghana Prisons Service
17. Narcotics Control Board (NACOB)

18. National Health Insurance Authority (NHIA), and
19. Ministry of Petroleum (MinPet)

Thirteen (13) out of the 19 IPs provided specific figures, budgeted for their NACAP activities (See Table 6). These activities included sensitisation and staff training on NACAP, the Code of Conduct for Public Officers, Code of Ethics, the Whistleblower Act, 2006 (Act 720), establishment of Service Charters Units or Departments, awareness creation on corruption, organised crime and intelligence gathering, among others as indicated in table 6 below.

Table 6: Number of IPs and amount Budgeted for 2016 NACAP Activities

S/No	IP	AMOUNT (GH¢)
1	MLGRD	80,000.00
2	Ghana Prisons Service	60,000.00
3	EOCO	20,000.00
4	GIFEC	20,000.00
5	PRAAD	50,000.00
6	MinPet.	98,132.00
7	NVTI	22,400.00
8	Parliament	450,000.00
9	CHRAJ	261,000.00
10	GIPC	20,000.00
11	MoGCSP	22,900.00
12	MoCs	55,000.00
13	PSRS	447,000.00
<b>Total Dedicated Budget for NACAP Implementation</b>		<b>1,606,432.00</b>

## ii) Designate Focal Persons for NACAP Implementation

Out of the fifty-six (56) implementing partners who reported on the implementation of NACAP activities for 2016, thirty-four (34) have designated focal persons responsible for NACAP in their organizations.

Table 7: IPs with Designated Focal Persons for NACAP

S/No.	Name of IP	Focal Persons
1	IAA	Mr. Thomas A. Thompson-Aryee, Dep. Director-General (FASS)
2	MLGRD	Principal Development Planning Officer and Head, M & E Unit
3	Ghana Prisons Service	Mr. Francis Amane-Addo, Asst. Director of Prisons

<b>S/No.</b>	<b>Name of IP</b>	<b>Focal Persons</b>
4	MELR	Head of Internal Audit Unit
5	EOCO	SSO Humphrey Nyaunu, Head of Professional and Ethical Standard & DSO Abubakari Issah, Legal and Prosecutions Department
6	SEC	Benjamin Tetteh Ozor, Performance Monitoring and Evaluation
7	GIFEC	Mr. Ben Jones Agbai, Principal HR Manager
8	PRAAD	Mr. Maxwell Ampofo, Prin. Records Officer
9	GNPC	A Principal Audit Officer
10	MinPet.	Mr. Ernest Deladem Kwaykuyi, Deputy Administrator
11	NVTI	Engr. Christian Agordah, Head of M&E
12	NCCE	Mr. Johnson Opoku, Director for programmes
13	DVLA	Mrs. Mabel Sagoe, Dir. Planning, Monitoring & Evaluations
14	JS	Mr. Clemence J. Honyenuga, A Justice of the Court of Appeal
15	MoRH	Ms. Efua Effah, Principal Egnr., Policy and Planning
16	NIA	Mr. Kwadwo Opuni, Asst. Officer, Strategic Planning & Research
17	NDPC	Mr. Jonathan Azasoo & Mrs. Alice Amekudzi
18	CHRAJ	NACAP Implementation Support Unit (NISU)
19	NPRA	Mr. Ronald Avenyo Addico & Mr. Kwame Kessiedu, Planning, Research Monitoring and Evaluation Officers
20	GIPC	Mr. Gideon Ocansey, Snr. Investment Promotion Officer
21	SADA	Ag. Director, Cooperate Affairs & Relationship Coordination
22	MOGCSP	Mrs. Thelma Ohene-Asiamah, Dep. Director & Mr. Abdul Karimu Tossa, Prin. Internal Auditor
23	BNI	Mr. Emmanuel Owusu, SNR. Officer
24	FIC	Mr. William Nutakor & Ms. Efua Gaisie
25	MoP	Mr. Richard Agbotame, legal Counsel at the Legal Unit
26	VRA	Mr. James J. Napur, Dir. Internal Audit
27	MoCs	Mr. Osman Abdul-Somed, ADIIB
28	NHIA	Mr. Aminu Yakubu (AG. Dep. Director, Internal Audit)
29	A-G. Dept.	Mr. K. Asiama-Sampong, CSA
30	PSRS	Mr. Samuel M. Gyepi-Garbrah, Head Internal Audit & Ms. Pearl Adisu, PR Officer
31	AdMA	Mr. Felix Ameyaw-Boachie, Asst. Dir. IIB & Ms. Rebecca Anan, Dev't. Planning Officer
32	AMA	Hon. Thomas Nii Boye Ashong, Presiding Member & Mrs. Dorinda Owusu Acheampong, HR Director
33	CDD	Mr. Samuel Baaye (M&E) Officer
34	Parliament	Mr. Ebenezer Djietror, Clerk of Parliament

### iii) Sensitisation of staff on NACAP

Thirty-six (36) IPs organised various sensitisation programmes for their staff including worker durbars, public fora, and training workshops. Over 2,749 persons benefited from the sensitisation programmes (See Table 8). Some IPs reported that they organised sensitisation programmes for their staff, but did not provide specific figures on the number of persons who participated.

Table 8: Number of Staff Sensitised

S/No.	IP	No. of Staff
2	Attorney-General's Dept.	63
3	Akwapim South District Assembly	44
4	Economic and Organised Crime Office	250
5	Ghana Investment Fund for Electronic Communication	49
6	Ghana National Petroleum Corporation	7
7	National Health Insurance Authority	65
8	Energy Commission	60
9	Ministry of Petroleum	40
10	Ghana Police Service	500
11	NAFTI	8
12	Driver Vehicle License Authority	100
13	Ghana Anti-Corruption Coalition	673
14	CHRAJ	157
15	Public Records Archival A Department	200
16	Ghana Prison Service	500
17	Financial Intelligence Centre	33
<b>Total</b>		<b>2,749</b>

### iv) Report on Implementation of NACAP

All the fifty-six (56) IPs reported on the general roles as well as the strategic objectives under the NACAP. Thirty-three (33) IPs reported on strategic objective 1, thirty-seven (37) on strategic objective 2, twenty-three (23) on strategic objective 3 and twenty-four (24) on strategic objective 4 (See Appendix 2).

### v) Take Measures to Prevent Corruption and Abuse of Office

#### *Strengthen internal controls*

As part of measures to strengthen internal control aimed towards reducing opportunities for corruption, IPs were required to train a number of ARICs and

other audit structures within their organisations as well as ensure compliance with procurement rules and processes. A total number of ninety-eight (98) ARICs and twenty (20) implementing partners were strengthened.

### *Establishing Safe Reporting Systems/Mechanisms at the Work Place*

Out of the fifty-six (56) IPs that reported, thirty-six (36) of them reported on this activity. Four (4) out of the 36 IPs reported that they were yet to establish safe systems reporting mechanisms. Twenty-five (25) reported they have operationalised safe reporting mechanisms at their work place, which include complaint boxes, online reporting platforms and systems, and toll-free call centres (see table 9). Some IPs had more than one mechanism while others only indicated that they have safe reporting mechanisms.

Table 9: IPs with Specific Safe Reporting Mechanisms

S/No.	Type of Safe of Reporting Mechanism	No. of IPs
1	Complaint/Suggestion Boxes	8
2	Online/Web-based Platforms and Systems	7
3	Toll free/Hot lines	2
4	Client Service Office	2
5	Others	6
<b>Total</b>		<b>25</b>

### **vi) Corruption and Misconduct at the at the Workplace**

IPs reported having received 604 complaints in all in relation to various forms of misconduct and acts of corruption. Out of the 604 complaints, 506 were dealt with and 285 persons sanctioned. The sanctions included reprimand, dismissal and refund of moneys.

### **vii) Sexual Harassment Policies at the Workplace**

The NACAP requires implementing partners to develop and publicise sexual harassment policies to effectively deal with sexual harassment at the work place. It was found that during the reporting period, only nineteen (21) out of the fifty-six (56) IPs had policies in place. The 21 IPs also reported that they had disseminated these policies through various means to their staff such as through staff durbars, and circulation of handbooks and manuals. A number of organisations also reported that they were in the process of finalising their policy documents to prevent sexual harassment at the work place as indicated in table 10 below.

Table 10: IPs with Sexual harassment Policies

S/No.	IPs with Sexual harassment Policies	No. Of IP(s)
1	Internal Audit Agency (IAA)	
2	Ministry of Employment and Labour Relations (MELR)	
3	Economic and Organised Crime Office (EOCO)	
4	Ghana Investment Fund for Electronic Communication (GIFEC)	
5	Ghana National Petroleum Company (GNPC)	
7	Ministry of Petroleum	
8	National Film & Television Institute (NAFTI)	
9	National Identification Authority (NIA)	
10	Ministry of Roads & Highways	
11	National Development Planning Commission	
12	Ghana Geological Survey Department	
13	Commission on Human Rights and Administrative Justice	
14	Volta River Authority (VRA)	
15	National Health Insurance Scheme (NHIA)	
16	Ministry of Communication	
17	Ministry of Gender, Children and Social Protection MoGCSP)	
18	Accra Metropolitan Assembly (AMA)	
19	Ghana Health Service (GHS)	
20	Financial Intelligence Centre (FIC)	
21	Energy Commission	
<b>Total</b>		<b>21</b>

### viii) Controlling Abuse of Office Time

Apart from the traditional attendance registers in use at workplaces, thirty (30) out of the fifty-six (56) implementing partners reported that they had introduced additional measures such as an electronic clocking device, an employee absence reporting system and employee movement book to control absenteeism, lateness to work and moonlighting (see table 11).

Table 11: Number of IPs with Control Measures in 2016

S/No.	Measures to control absenteeism, lateness and moonlighting	No. of IP(s)
1	Attendance Register & Movement Book	17
2	Employee Absence Reporting System	1
3	Time & Attendance Management System	1
5	Access Control Project	1

S/No.	Measures to control absenteeism, lateness and moonlighting	No. of IP(s)
6	Electronic Clocking Device	6
7	Circular Issue to all Staff on absenteeism, Lateness & Moonlighting	1
8	Biometric Attendance Register & "Out of Post" form	1
9	Conduct & Disciplinary Procedures in place	1
10	Civil Service Rules on Attendance & Absenteeism enforced	1
<b>Total</b>		<b>30</b>

## ix) Key findings, Conclusions and Recommendations

On the measures to reduce opportunities for corruption in MDAs and within IPs, the report shows that thirty-six (36) IPs had established and operationalised safe reporting mechanisms at the work place, including placement of suggestion boxes, online reporting platforms, and toll free call centres.

Twenty-one (21) IPs had sexual harassment policies, which they disseminated to staff through staff durbars, handbooks and manuals, while others, were in the process of finalising their policies.

Six hundred and four (604) complaints on acts of corruption or misconduct were received, 506 were processed for investigation, and 285 persons either sanctioned, with some dismissed from employment.

### Progress and Conclusions

In conclusion, the reports from IPs on general roles indicate that there has been increased knowledge and awareness on NACAP with thirteen (13) out of twenty IPs budgeting specifically for the implementation of NACAP in 2016. In 2015, only CHRAJ reported budgeting for NACAP implementation.

Despite the progress made in the period, challenges still exist. The number of IPs reporting on the implementation of NACAP fell far below expectation. Only four (4) MMDAs – LEKMA, AMA, AdMA and ASDA out of 216 reported. No private sector IP reported. Similarly, with the exception of GII, GACC and CDD, no other civil society or faith-based organisation reported in the period despite the intense preparatory activities undertaken to enhance implementation and reporting.

### Recommendation

Although the full reasons are not yet available for it, it is imperative we devise more effective ways to engage with CSOs, FBOs and the private sector. It is therefore recommended that CHRAJ, the Chair of HiLIC and MONICOM consider this issue seriously.

## 3.6.2. Strategic Objective 1

### To Build Public Capacity to Condemn and Fight Corruption and to Make Corruption a High-Risk, Low-Gain Activity

Seventeen (17) Broad Activities were selected for implementation compared to nine (9) in 2015. Thirty-three (33) Specific Activities were generated from the Broad Activities in 2016, as compared to twenty-four (24) in 2015. In all, thirty-two (32) out of the fifty-six (56) IPs implemented specific activities aimed towards enhancing capacity of the public to condemn and further make corruption a high-risk and low-gain activity. Table 11 depicts Lead IPs that reported and those that failed to report on specific activities assigned them under the NACAP for 2016. Although the number of implementing partners that submitted reports under this objective increased from 5 in 2015 to 31 in 2016, the number still fell below expectation.

Table 11: List of Lead IPs Reporting and Not Reporting on Strategic Objective 1

S/No.	Lead IPs Reporting		Lead IPs Not Reporting	
	2015	2016	2015	2016
1	CHRAJ	Audit Service	EOCO	GES
2	OOP	NCCE	IAA	OoP
3	GII	NVTI	CAGD	MoD
4	GACC	EOCO	GAS	MLGRD
5	SEND GHANA	SEC	PEF	PSC
6		GNPC	PSC	Akwapim South District Assembly
7		Ministry of Petroleum	OHSC	MELER
8		(GACC)	ML&R	P o G
9		GII	MLGRD	GHS
10		NIA	EC	Ghana Prisons Service
11		Judicial Service	Parliament of Ghana	NAFTI
12		NDPC	AuG	DVLA
13		NCCE	WAEC	FWSC
14		CHRAJ		PPA
15		PRAAD		Ghana Police Service
16		NACOB		Ghana Bar Association
17		NPRA		PEF
18	GIPC		MoJAGD	



S/No.	Lead IPs Reporting		Lead IPs Not Reporting	
	2015	2016	2015	2016
19	SEND GHANA	MOF		AMA
20		SADA		GA Coordinating Council
21		MoGCSP		
22		GIFEC		
23		FIC		
24		IAA		
25		MoRH		
26		Ministry of Communication		
27		MoF		
28		EnC		
29		BNI		
30		NHIS		
31				
<b>Total IPs</b>	<b>5</b>	<b>31</b>	<b>14</b>	<b>20</b>

Some of the activities carried out by IPs included:

- Organisation of public education/ awareness and campaign programmes
- Measures to promote integrity in organizations
- Dissemination of AC materials
- Promoting the Whistleblower Law
- Sensitisation of the private sector on drafting business contracts to reflect AC issues
- Establishment of special awards on integrity and signing integrity pacts and
- Signing integrity pacts

#### **i) Public Education and Awareness Programmes**

A total of 10,252 programmes were organised within the reporting period. These programmes were implemented by CHRAJ, NCCE, Ministry of Petroleum, MoRH PRAAD, NACOB, NPRA, GIFEC and three CSOs, namely CDD, GII and GACC. Some of the public education and awareness programmes took place in the regions and districts targeted students in tertiary institutions and faith-based organisations (FBOs).

The GII reported that it had organised a general sensitisation programme on corruption in two regions for over 2000 members of FBOs. It also held an anti-corruption forum in Accra, which brought together 178 participants. Ghana Integrity Initiative (GII) organised four (4) sensitisation programmes for a total of

144 participants in open governance and transparency in the Upper West, Brong-Ahafo and Volta Regions. Three (3) capacity-building workshops were conducted on corruption on climate financing in Kadin-Assin (Central Region) and Offinso (Ashanti Region). A sensitisation programme, generally on corruption was also organised in the Upper West (Wa) and Northern Regions (Tamale). Participants in both regions consisted of 1,600 Christians and 484 Muslims.

The CDD also reported receiving funding support from its partner, Star-Ghana, to organise sensitization campaigns and capacity building programmes on election-related corruption for over 32,000 electorates across 16 Constituencies, media houses and 20 individual women under the Vote Buying Project for 2016 general elections. CHRAJ also partnered with WANEP and the National Peace Council to monitor the right to vote, and observe the 2016 Presidential and Parliamentary elections. The nationwide exercise formed part of a broader exercise to monitor the impact of election related corruption and Citizens' Right to Vote and Citizens' Right to Choose their leaders. In addition, CHRAJ carried out a number of Public Education through its District Offices on the threat of political and election related corruption to Ghana's democracy. The GACC also organised eight (8) media engagements in eight (8) districts.

NPRA also conducted serialized sensitization targeting the listening audience of Uniq, Hot FM, XYZ and Obonu radio stations. This is in addition to training programmes for representatives of MMDAs, ISD, NCCE and Social Welfare workers, and informal sector workers on NACAP in Ashanti Region. Eighteen staff members also benefitted from a training on anti-money laundering on 18<sup>th</sup>-19<sup>th</sup> May.

PRAAD also organized sensitization workshops for sixty (60) of its public officers. NVTI sensitised 34 staff in the Volta Region on anti-corruption strategies.

The MoRH incorporated awareness creation on NACAP into its quarterly durbar, including sensitisation of its agencies on the PFM Act, 2016 (Act 921).

In the year under review, GIFEC conducted two (2) training sessions on its newly developed code of conduct and guidelines on management of conflict of interest. The Ministry of Petroleum, in collaboration with CHRAJ, organised a sensitisation workshop on NACAP for seven (7) internal audit staff members. CHRAJ also organised the following NACAP related programmes for MDAs:

- A validation/training workshop for implementing institutions on NACAP and the 2016 reporting tool on 29<sup>th</sup> June at La Palm Beach Hotel;
- A HiLIC meeting to update members on 2016 activities slated under NACAP on 21st July at Flagstaff House;
- Sensitisation for staff of the Ministry of Employment and Labour Relations on 17th June at the Ministry's conference room; and

- Sensitisation on NACAP and the reporting tool for GIFEC, NAFTI, NPRA focal persons, NIA focal persons, GNPC, Internal Audit staff, NVTI management and two officials from Bui Dam.
- CHRAJ further organized 1,200 public education programmes in all the districts nationwide.

NACOB also organised 566 public education and capacity-building seminar on corruption. Areas covered included moonlighting, bribery, gift and drunkenness. Others included drug trafficking, absenteeism, drug misuse and sexual abuse.

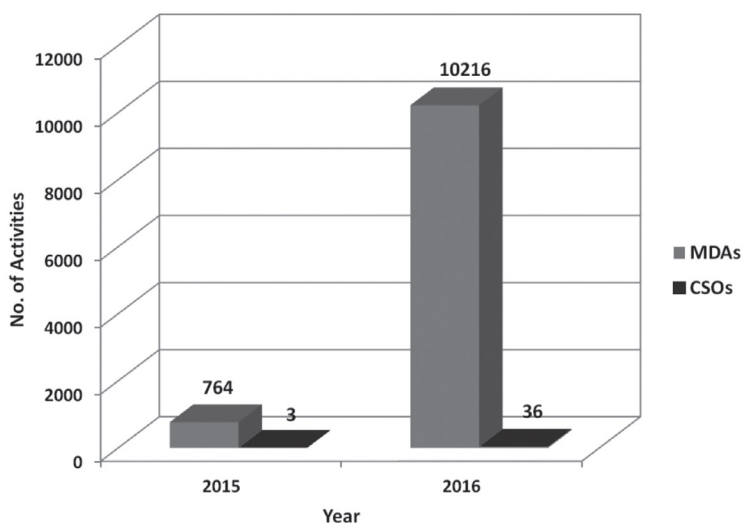
NCE also organised 8,015 public education programmes for basic schools nationwide, while the CHRAJ undertook over 415 public education programmes on the linkage between corruption and the enjoyment of human rights in the regions and districts.

Table 12 and Figure 1 compare several public education and awareness activities conducted by MDAs, CSOs, and the private sector. It indicates an increase in public education and awareness activities between 2015 and 2016, particularly within MDAs. Likewise 2015, the 2016 report did not record activities implemented under the Private Sector.

Table 12: Number of Public Education and Awareness Activities Carried Out

No. Organised	2015	2016
MDAs	764	10,216
CSOs	3	36
Private Sector	–	–
<b>Total</b>	<b>767</b>	<b>10,252</b>

Figure 1: Public Education and Awareness Creation Activities



## **ii) Mainstreaming Anti-Corruption, Ethics and Integrity in Organisations**

Five IPs, namely EOCO, GNPC, NSS, GIPC, and CHRAJ initiated measures to promote integrity in their organisations. These measures included adoption and institution of code of conduct as part of institutional culture and designation of focal persons to handle issues related to ethics.

The NSS revised its payroll to reduce loopholes for ghost names on the national service payroll, including the use of the Ezwich (electronic) platform. In addition, NSS installed Closed-Circuit Television (CCTV) cameras to monitor activities of its personnel operating cash till machines, the Call Centre and the general compound and car park. To ensure that the much-needed revenue received from sales point of national service scheme's restaurants and bars is protected, cash till machines have been installed at various national service canteens and bars.

EOCO has set up an ethics and integrity desk known as the Professional and Ethics Standard Unit (PESU) with a focal person to handle issues relating to ethics.

CHRAJ reported that it took measures to ensure compliance with the assets declaration law, including making the disclosure of assets and liabilities by senior officers as provided for, under Act 550, a condition for holding office. The Commission has developed the integrity compliance tools for MMDAs and MDAs under the Public Service Integrity Programme (PSIP) including the gift policy.

CHRAJ and EOCO reported that anti-corruption, ethics and integrity have been made part of organizational culture in their establishments. GNPC has also developed its draft Code of Conduct, which is expected to be reviewed and approved by Management.

EOCO, NIA, Ministry of Communications, Energy Commission (EnC), Ministry of Foreign Affairs (MoFA) and GIPC have taken steps to institute integrity awards schemes within their organizations.

Ghana Investment Promotion Centre reported that it now has in place Code of Conduct and Avoidance of Conflict of Interest Guidelines.

National Pensions Regulatory Authority received and acted on several calls from workers especially about non-payment of 5% contribution after deduction from workers' salaries.

## **iii) Awareness Raising Programmes on the Money Laundering**

EOCO has afforded 35 officers training opportunities at the West African Training Centre, Accra as well as sent officers abroad for training on money laundering and

terrorism financing. Beneficiaries have shared the knowledge acquired with other members of staff.

The National Pensions Regulatory Authority (NPRA) trained eighteen members of staff from various departments on anti-money laundering and countering the financing of terrorism from 18<sup>th</sup> to 19<sup>th</sup> May, 2016. Twenty-one members of staff are also scheduled to be trained in the first quarter of 2017.

FIC organised anti-money laundering and countering the financing of terrorism (AML/CFT) training sessions for members of the Board of Directors, key management staff, operations managers, anti-money laundering reporting officers (AMLROs)/ compliance officers for 997 officials drawn from the following sectors: Banking: 273 participants; Insurance: 283; Capital Market Operators: 309 and DNFBP: 112.

#### **iv) Unify Remuneration and Board Allowances**

The Ministry of Finance unified remunerations and allowances for boards. Ministry of Foreign Affairs and Regional Integration, Ministry of Communications and GIPC reported that all allowances they paid to Board members were based on the allowances approved by Ministry of Finance.

#### **v) Strengthen Complaints Units at the Police and Judicial Services**

The Judicial Service reported that it has established a Complaints Unit at the new Law Courts Complex to receive complaints at that point. It also reported that it is employing IT and internet facility to facilitate the processing of complaints from the public. The Ministry of Communications also reported that an E-Justice implementation is on going to provide online platforms.

#### **vi) Strengthen Anti-Corruption Capacity at the District and Regional Levels**

EOCO, CHRAJ, IAA, and PRAAD, organised training, workshops, seminars and other programmes to build capacity of members of staff on the Whistleblower Act, 2006 (Act 720). In addition, copies of the Whistleblower Act were distributed to members of staff of the organisations. Other materials on the Whistleblower Act were also disseminated in the regions and districts within the period.

EOCO and CHRAJ sent copies of the Whistleblower Act to the various regions for further sensitisation of members of staff and the public, and through its website, encouraged the public to blow the whistle on any pertinent issues. EOCO also organised sensitisation workshops and conferences for regional directors and unit heads.

The National Development Planning Commission (NDPC) have put in place a toll-free line for subscribers and staff to report abuses of the processes to the head office.

The Ministry of Petroleum had provided suggestion boxes at the Ministry.

The Ministry of Communications had provided confidential complaint and suggestion boxes at vantage points in the ministry.

VRA plans to implement the whistle blower policy and reporting mechanism in 2017 and follow it up with promotional activities. Likewise, the Energy Commission reported it will institute its whistle blowing mechanism in 2017.

The GIPC has put in place suggestion boxes, whereas the NHIS has put in place a toll-free line for subscribers and staff to report abuses of the processes to the head office.

### **vii) Anti-Corruption Provisions in Business Contracts**

The NHIS and the Ministry of Communications indicated that their business contracts are always done in line with the PPA approved procurement processes. PPA has already included anti-corruption clauses in the Standard Conditions of Contracts for all public sector contracts.

CHRAJ and GNPC reported they have standard clauses already incorporated in their contracts. The GNPC reported it has trained its legal department staff who work on contracts on how to include standard anti-corruption provisions in business contracts. CHRAJ also reported that it has trained its procurement unit on the standard anti-corruption clauses.

### **Key Findings, Conclusions and Recommendations**

Thirty-three (33) IPs, as against nineteen (19) in 2015, conducted public education on corruption and related crimes, including awareness creation on whistle blowing, anti-money laundering and countering the financing of terrorism, and the impact of these crimes on the enjoyment of fundamental human rights and freedoms. The IPs also reported implementing measures to enhance integrity and integrate anti-corruption measures in their work programmes.

In all, public education/awareness creation and campaign programmes, numbering 10,259 programmes were organised for a targeted audience of over 40,306 participants, compared to the 765 programmes in 2015. Participants were drawn from 2<sup>nd</sup> Cycle schools, the public sector, FBOs, NGOs, media houses, electoral constituencies, the informal sector, and a listening audience of 4 radio stations.

Other IPs intensified awareness creation using worker durbars, a novelty, on diverse subject areas including the new Public Financial Management Act, 2016 (Act 921),

open governance and transparency, anti-money laundering, drug trafficking, absenteeism, drug misuse and sexual harassment.

Also, measures to promote integrity in organisations were undertaken, including adoption of codes of conduct and designation of focal persons to handle issues related to ethics as well.

### 3.6.3. Strategic Objective 2

#### Institutionalise Efficiency, Accountability and Transparency in Public, Private and Not-for-Profit Sectors

Twenty-three (23) broad activities were selected for implementation under Strategic Objective 2 in 2016, compared to twenty-six (26) in 2015. Thirty (30) specific activities and 31 indicators were generated out of the broad activities to be implemented by IPs. Fourteen (14), out of the 56 IPs who reported on in 2016 reporting period, reported on strategic objective 2, which is aimed at institutionalising efficiency, accountability and transparency in public, private and not-for-profit sectors. (See Table 13 below).

Table 13: List of Lead IPs Reporting and not reporting on Strategic Objective 2

S/No.	Lead IPs Reporting		Lead IPs Not Reporting	
	2015	2016	2015	2016
1	CHRAJ	MoF	PEF	GRA
2	PSC	GNPC	GAS	EC
3	OHSC	MinPet	CAGD	OHSC
4	IAA	GAS	MLGRD	JS
5	Parliament	CHRAJ	EC	PSO
6	GHS	IAA	LEA	Examination Entities
7	PSRS	MLGRD	A-G	MDAs
8	Prison Service	Parliament	OoP	CAGD
9		SEC	AuG	GACC
10		PSC	Educational Institutions	OoP
11		NCCE		Educational Institutions
12		WAEC		MMDAs
13		A-G		
14		PEF		
<b>Total</b>	<b>8</b>	<b>14</b>	<b>10</b>	<b>12</b>

There were 23 Broad Activities, 30 Specific Activities and 31 Indicators under strategic objective 2 to be implemented by IPs. (See Table 14)

Table 14: Indicators and Results under Strategic Objective 2

S/No.	Indicator	Number Reporting	
		2015	2016
1	Number of revenue collection agencies with computerized and net-based systems in place.	0	3
2	General public educated.	0	2
3	Simplified Procedures of Tax Assessment, Collection and Payment Verification Procedures developed.	0	1
4	Simplified Procedures of Tax Assessment, Collection and Payment Verification Procedures published.	0	0
5	EITI principles extended.	0	3
6	Number of Customer Service Charters Developed and Implemented for MDAs.	3	16
7	Number of Customer Service Charters Developed and Implemented for Private Sectors.	0	2
8	Number of MDAs and MMDAs that circular was issued to.	2	5
9	Number of Heads of MDAs and MMDAs sanctioned for not preparing financial statements.	0	0
10	Number of ARICs established in MDAs and MMDAs without ARICs.	1	22
11	Number of ARICs of MDAs trained.	2	17
12	Number of persons and parties that breach the laws regulating political operations pursued.	0	0
13	Code of Ethics for MPs developed.	2	13
14	Conflict of Interest Rules enforced by Agencies.	0	7
15	Number of awareness creation events organized.	1	5
16	Number of training programs organized for Ethics Advisory Committee members.	1	2
17	Number of training tools provided.	0	2
18	Number of ethics desks established.	0	18
19	Public Service Integrity Program implemented.	1	5
20	Review of Asset Declaration Law.	1	2
21	Adverts on vacant positions in state institutions published in the media.	2	7
22	Number of public office holders appointed.	2	6
23	Number of civic awareness programmes undertaken.	1	3
24	Number of schools and institutions accounts audited.	2	2
25	Number of locations CCTV cameras or devices installed.	0	1
26	Number of target organizations identified to conduct system organizations.	0	5
27	User-friendly and efficient tax administration systems implemented.	0	0



S/No.	Indicator	Number Reporting	
		2015	2016
28	Law on Code of Conduct for Public Officers enacted.	1	2
29	Number of Public Officers disclosing personal interest.	0	13
30	Number of Human Rights Organizations included in the membership of GACC.	0	0
31	Number of Town Hall Meetings organized	0	1

### **i) Computerizing Revenue Generation**

The Ministry of Finance reported that its computerisation process was 80% complete. That it had also embarked on public education on this project.

The Ministry also reported that it had developed four (4) manuals, namely; Taxpayer Service Manual, Audit Manual, Compliance, Enforcement and Debt Management Manual, and Self-Assessment Manual for the simplification of procedures of tax assessment.

### **ii) Extend EITI Principles to the Oil and Gas Sector**

The Ministry of Petroleum reported having extended EITI principles to the oil and gas sector. This was done in collaboration with the Ghana National Petroleum Corporation. A multi-stakeholder Steering Committee was set up, and the EITI principles were captured in the Petroleum (Exploration and Production) Bill for consideration by Parliament. The 2014 GHEITI report on oil and gas were also published.

The Ministry of Finance reported that prior to its publication it had carried out public engagements to discuss the findings in the draft GHEITI report and made recommendations for input in the final report.

### **iii) Generic Customer Service Charter**

CHRAJ reported that it had developed a generic Client Service Charter as prototype for use by all public sector institutions. This was done in collaboration with the PSRS. The generic Client Service Charter will be validated and finalised in 2017.

GIFEC reported is working<sup>8</sup> to develop its charter with technical assistance from CHRAJ.

The Ghana Health Services (GHS) reported it had developed a Customer Care Manual with an accompanying video clip, and that it continued to sensitize clients on the Patients Charter.

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<sup>8</sup> MDAs & MMDAs and other Public Service organisations are expected to develop their Client Service Charters using Proto-type templates developed by CHRAJ.

The NHIA also reported it has developed a Client Service Charter and distributed 300,000 subscribers' handbooks.

A number of IPs including IAA, Ministry of Power, Energy Commission, SEC, all reported having developed service charters. Greater Accra Regional Coordinating Council (GARCC) and Ministry of Communication established a Client Service Unit.

Ministry of Foreign Affairs and Regional Integration reported that it has published a client service charter, which has been circulated to all Bureau and Missions abroad. MoRH Service Charters for the Ministry and Agencies are being reviewed and improved.

PEF used its 83<sup>rd</sup> Governing Council meeting to sensitize members drawn from various business associations on Service Charters. It also organised a sensitisation meeting for 14 private institutions without Service Charters.

#### **iv) Timely Preparation of Financial Statements for Audit**

The Audit Service issued circulars to all MDAs and MMDAs to prepare their financial statements. It reported that majority of the MDAs and MMDAs prepared their financial statements for 2016. GNPC, Ministry of Petroleum, Ministry of Power, the Internal Audit Agency complied, GARCC, GIFEC and NPRA reported having prepared their financial statements on time and in accordance with law.

#### **v) Audit Report Implementation Committees**

IAA reported that 343 ARICs have been established as at the end of 2016 out of an expected number of 399 leaving sixty (60) MDAs and MMDAs without ARICs. With the passage of the PFM Act, 2016 (Act 921) and the replacement of ARICs with Audit Committees, the IAA reported developing new guidelines for the formation and operation of the Audit Committees.

During the reporting period IAA trained 104 ARIC members and management staff from institutions including NABTEX, GTA, EPA, FC, ATU, NCA and NMC.

MLGRD reported that ARICs have been established in all MMDAs and trained.

#### **vi) Public Service Integrity Programme**

Activities under the Public Service Integrity Programme undertaken by the relevant IPs covered Conflict of Interest, the National Ethics Advisory Committee, (NEAC) and the Code of Conduct for Public Officers, among others.

CHRAJ organized a number of training programmes and public education on the Code of Conduct and the Conflict of Interests Guideline for Public Officers. CHRAJ organised two training programmes for the National Ethics Advisory Committee (NEAC) members. CHRAJ also worked with NEAC and other stakeholders to develop integrity compliance tools, including Code of Conduct Compliance Questionnaire, Gift Policy and Registration Forms.

CHRAJ's public education and enforcement of conflict of interest rules was continued earnestly in the regions and districts.

Other IPs reported that they had either trained or organised sensitisation programmes for staff and the public on conflict of interest and the Code of Conduct for Public Officers under Chapter 24 of the 1992 Constitution. They include EOCO, NPRA, Ministry of Foreign Affairs and Regional Integration and the Ministry of Communication.

EOCO, NIA, AMA, GIFEC and MoRH all reported having appointed Ethics/ Compliance Officers. BNI, Ministry of Foreign Affairs and Regional Integration reported that they are in the process of establishing Ethics Desk. Energy Commission also reported that it would establish Ethics Desk in 2017. Parliament of Ghana reported that the Code of Ethics for MPs has been drafted for consideration and adoption. It also announced being in the process of reviewing the Asset Declaration Law.

SADA reported that its CEO, Directors and Coordinators declared their assets. Ghana Prisons Service reported that it has developed a manual on ethics and standards for approval by Parliament.

Energy Commission also reported it has included the implementation of the public service integrity programme into its 2017 Work Programme. That it is in the process of developing a personal interest disclosure form for staff and new recruits.

Ministry of Communication introduced a Best Worker Award initiative to improve integrity of service.

IAA reported that they always ensure that staff, management and board disclosed their interest in all transactions that they are involved in directly or indirectly.

EOCO also reported that all officers who have been engaged or appointed are required to disclose their personal assets and interests.

Ministry of Foreign Affairs reported that Officers of A1 Grade are made to complete the Declaration of Assets Forms.

PSC also reported that all the 76 appointees were given the declaration of assets and other interest forms to fill for onward submission to the Auditor-General.

NIA reported it plans to make it mandatory for public officers in NIA to declare their personal interest when they take up any new appointment.

CHRAJ has also made assets declaration a condition for holding office for its entire senior staff.

SADA reported that one (1) CEO, five (5) directors and four (4) coordinators have declared their assets and disclosed personal interests before assuming office.

It is noted that Ghana missed the opportunity again to pass the Conduct of Public Officers Bill.

#### **vii) Appointment of CEOs and Accountability from Public Officials**

As part of corruption prevention measures in the appointment of Chief Executives, 68 vacant positions were advertised during the period under review.

Ministry of Foreign Affairs and Regional Integration and Ministry of Communication advertised vacant positions in the public media. The PSC itself advertised 65 vacant positions. The SEC advertised 3 vacant positions in the State-Owned Media.

PSC reported appointing 67 public officers; MELR appointed 2 chief executive officers (CEOs) for the National Labour Commission (NLC) and NPRA; NVTI appointed head of monitoring and evaluation; and GIPC appointed 6 public officers through transparent means.

#### **viii) Auditing Schools/Institutions**

The Ghana Education Service (GES) collaborated with the Audit Service and audited a total of 198 schools. Internal Audit reported that audit at formal schools are done on annual basis and currently, the audit for 2015 was ongoing.

#### **ix) Creating Civic Awareness for Accountability**

NCCE undertook a series of civic awareness programmes in the regions and districts. NPRA, as part of its mandate to educate and sensitize the public on the 3-tier pensions, undertook activities aimed towards educating and empowering contributors and other key stakeholders to monitor closely the activities of their respective service providers. CHRAJ also embarked on civic education campaigns in the regions and districts to build capacity of the public to hold duty bearers accountable, organizing 415 programmes in the process.

## **x) Security for Examination Materials**

GES reported installing CCTV cameras at several undisclosed locations. They also reported that they are collaborating with West Africa Examination Council (WAEC) and other agencies, such as NVTI and private institutions to install CCTV cameras at locations where preparation and packing of examination papers take place.

## **xi) Conducting System Examination of Institutions**

EOCO examined the activities of the DVLA, The School Feeding Programme, The National Service Scheme and the erstwhile Ghana Youth Employment Entrepreneurial Development Agency (GYEEDA) to plug corruption loopholes in such institutions. NIA is developing administrative procedures to monitor various departments, including procurement, accounts and client services. IAA reported that it identified significant audit findings during the review of the internal audit reports. A list of corruption-prone MDAs & MMDAs is to be developed to assist those organizations respond more effectively to corruption and other risks.

## **Key Findings, Conclusion and Recommendations**

Fourteen (14) out of twenty-four (24) lead IPs submitted reports on how they implemented a total of thirty-one (31) specific activities that should lead to institutionalising efficiency, accountability and transparency in public, private and not-for-profit sectors as provided under Strategic Objective 2.

The activities included development and implementation of Customer Service Charters to improve standards and service delivery, providing adequate Security for examination materials, implementing the PSIP and strengthening internal controls.

Although the participation of IPs under this Strategic Objective is comparatively better than the previous year when nineteen (19) reported, many more IPs are yet to get involved.

Also significant was the enhancement of security for examination materials where CCTV cameras were installed at undisclosed locations by the GES, while efforts were ongoing to have private institutions install CCTV cameras at locations where preparation and packing of examination materials take place.

In a bid to enhance efficiency and accountability, the MoF introduced computerised and net base systems of revenue collection. MoF also had developed four manuals to facilitate tax or revenue assessment and collection, which did not previously exist.

The PSIP was taken to another level with the development of integrity compliance tools for use by MDAs and MMDAs. More IPs are implementing the Assets Disclosure Regime, codes of conduct and conflict of interest rules.

## Recommendations

- More effort should be made to assist IPs who are already reporting to improve their reporting, whilst those yet to report are incentivized and assisted to implement and report.
- IPs should be encouraged to have strong implementation structures in addition to focal persons to build institutional memory for sustaining the gains of NACAP.

### 3.6.4. Strategic Objective 3

#### To Engage Individuals, Media and CSOs in Reporting and Combating Corruption

Fourteen (14) Broad Activities were selected for implementation, compared to three (3) in 2015. By the work plan, at least, 21 lead IPs were expected to carry out activities under this objective. However, the reports show that 11 IPs submitted reports on this strategic objective. (See Table 15 below).

Table 15: List of Lead IPs Reporting and Not Reporting on Strategic Objective 3

S/No.	Lead IPs Reporting		Lead IPs Not Reporting	
	2015	2016	2015	2016
1	CHRAJ	CHRAJ	GRA	MEDIA COMMISSION
2	EOCO	GACC	CEPS	GJA
3	PSC	EOCO	A-G	GHANA POLICE SERVICE
4	IAA	A-G	AS	NACOB
5	PARLIAMENT	PARLIAMENT	NDPC	GRA
6	OoP	MOF	NACOB	CEPS
7	NDPC	GII	BNI	AS
8		NDPC	PEF	GSS
9		IAA		OoP
10		BNI		CSOs
11		MoF		FBOs
12				NGOs
<b>TOTAL</b>	<b>7</b>	<b>11</b>	<b>8</b>	<b>12</b>

In all, 23 IPs [made up of the 11 Lead IPs above and NPRA, NIA, Energy Commission, NVTI, SEC, MELR, GNPC, Ministry of Petroleum, GIPC, NHIA, MGC&SP and CDD]

carried out a number of activities aimed towards realising the goals of Strategic Objective 3. These activities include training and educating media practitioners and CSOs on anti-corruption methods, practices and challenges encountered in fighting corruption, and on election-related corruption, implementation of the whistleblower legislation, and other reporting mechanisms. The activities focused on using audio visuals and multimedia channels in awareness raising programmes, creating safe systems for reporting cases and providing legal advice to victims of corruption.

It is encouraging to note that NPRA, NIA, Energy Commission, NVTI, SEC, MELR, GNPC, Ministry of Petroleum, GIPC, NHIA, MGC&SP and CDD, all implemented activities under this Objective although they did not have lead or collaborating responsibilities.

### **i) Media, NGOs and Anti-Corruption Methods**

Seven (7) IPs developed and organized a number of awareness programmes for the media on corruption, investigative journalism and other related areas. Table 16 provides an overview of the programmes.

Table 16: Programmes with Media Organisation and NGOs

<b>IP</b>	<b>Activities</b>	<b>Beneficiary Organization</b>	<b>Number</b>
Economic & Organized Crime Office (EOCO)	Sensitisation programmes with support from UNDP and DIFID	UNDP and DFID.	2
Ghana Integrity Initiative (GII) as part of a consortium made up of GACC and SEND Ghana	Corruption reporting and investigative journalism	Journalists	10
GACC	Under ADISS, training and educating on abuse of incumbency project on electoral corruption	Investigative journalist; media houses	5
CHRAJ	Sensitization programmes on NACAP and corruption	Media houses in the Upper West region at Wa	25
CDD	Sensitization on election related corruption, and training on checklist for monitoring vote-buying activities under the 'Vote Buying project'.	Media houses	Lack of data
National Pensions Regulatory Authority (NPRA):	Sensitization programmes about prospective pensioners rights under the 3-Tier pension scheme and how to report breaches by employers and service providers.	Lack of data	20



The lead agencies (GJA, & Media Commission) who have the primary responsibility to undertake this specific activity did not submit their mid-term NACAP 2016 report. However, EOCO, CHRAJ, NPRA, CDD, GACC and GII reported implementing programmes under this activity.

EOCO organised two sensitisation programmes with the support of UNDP and DFID. CHRAJ carried out sensitization programmes for 25 media houses in Wa in the Upper West Region.

Ghana Integrity Initiative (GII), as part of a consortium made up of GACC and SEND Ghana, trained 10 journalists on corruption reporting and investigative journalism on 22 April 2016. GACC, and partners under the ADISS project, also trained 5 journalists on corruption reporting and investigative journalism. GACC further organized education on election related corruption including abuse of incumbency for media houses.

CDD and partners under the Vote Buying project also reported sensitizing over 32,000 voters, and trained media houses and 20 individual women on election related corruption especially vote-buying activities in 2016 general elections.

## **ii) Guidelines on Receiving Whistleblowing Disclosure**

The ACAs are the lead agencies expected to develop guidelines, such as complaints and suggestion boxes, and hotlines on receiving and processing of disclosures. Act 720 provides the manner in which individuals may in the public interest disclose information that relates to unlawful, corrupt or other illegal conduct or practices. The Act aims at ensuring that persons who made the disclosures were not subject to victimization.

CHRAJ developed guidelines on receiving and processing whistleblower disclosures and published same on [www.chrajghana.com](http://www.chrajghana.com).

EOCO also undertook the following activities:

- Sensitised all members of staff on whistle blowing;
- Fully participated in workshops on whistle blowing at Ada and Koforidua organized by CHRAJ with support from UNDP;

BNI developed guidelines in line with procedures of the Bureau regarding receiving information from the public and other sources.

Ministry of Employment and Labour Relations reported that it had two (2) complaint boxes positioned at the conference room of the Ministry and Staff were educated and encouraged to report misconduct for investigations.



The NPRA has secured a toll-free number – 00800766000, which has been activated across networks to facilitate and promote whistle blowing.

GIPC had in place suggestion boxes and emails for reports on misconduct or impropriety, and National Health Insurance Authority (NHIA) has in place a toll-free line for subscribers and staff to report abuses of the NHIS processes to the headquarters.

### **iii) Multimedia Channels for Awareness Raising**

One of the NACAP activities was to engage in broad public education to raise awareness about anti-corruption values. CHRAJ worked in collaboration with GACC, CSOs, A-G, and the NCCE on this score. The implementing agencies are expected to develop audio/visuals and test content materials as they used TV and radio discussions to heighten awareness of the public.

In carrying out this activity, the NCCE developed 21,740 posters and 21,710 wristbands for the purposes of public education on ethics and integrity for education at Senior High Schools. CDD reported having led several media discussions on the need for a Special Prosecutor who will operate independently, as provided for in the NACAP. The GII has also produced a series of audio/visual materials and created social media platforms for public education, which includes the following:

- Facebook site with 1,788 likes
- Twitter (@GhanaIntegrity with 50 followers
- Radio jingle in four (4) languages promoting Advocacy and Legal Advice Centres
- One (1) radio jingle in English promoting ipaidadbire.org
- Brochures/flyers promoting corruption reporting
- Radio sensitisation in Wa and on Radio Justice (98.5) in Tamale with a listenership of approximately 562,919 people

CHRAJ and GACC also organized a live TV programme on VIASAT 1 TV

GACC has a social media presence meant to engage and raise public awareness. These are as follows:

- a twitter account (@GACC\_GHANA) with 326 likes
- a Facebook page (Ghana anti-corruption coalition) with 990 likes and
- booklets and brochures promoting the fight against corruption

### **iv) Instituting Confidential Reporting Systems to Protect Reporting Persons**

A conducive environment is essential for the successful implementation of the NACAP. To create that enabling environment, the NACAP gives priority to facilitate

reporting of corruption and protecting victims and whistleblowers. The specific activity required of the implementing agencies was to institute confidential reporting systems for citizens to report cases of corruption and dedicated persons were assigned to manage the confidential reporting system.

EOCO reported that, the following measures were in place to enable citizens to safely report corruption:

- An active confidential website for citizens to report cases of corruption;
- An enabling environment was created by EOCO that allowed citizens to freely walk in to report incidence of corruption;
- Citizens on their own volition to directly send petitions and complaints regarding corruption to the Office for investigation and prosecution, and
- A confidential registry has been established to manage the confidential information of personnel including the reports of corruption.

NACAP envisions that the support of the citizenry must be enlisted to ensure its success. Citizens should serve as anti-corruption watchdogs and be encouraged and supported to report corrupt practices to the appropriate anti-corruption and law enforcement agencies. Citizens must be empowered through education and sensitisation to put the nation first by saying “no” to vote buying, bribe giving, and bribe taking and all forms of corruption.

As part of the roles assigned to CSOs, the GII has developed two reporting mechanisms for corruption reporting. These are ALAC reachable toll-free number 0800 100 125 (Vodafone) and 0800 100 250 (Tigo & Airtel) and [alac@tighana.org](mailto:alac@tighana.org), and [www.ipaidabribre.org.gh](http://www.ipaidabribre.org.gh) reporting platforms to receive complaints and provide legal advice to victims of corruption.

It is worth noting that both reporting systems are accessible nationwide; ALAC is based in Accra with two regional desks set up in SEND Ghana office in Tamale and Wa.

Internal Audit Service reports that complaint centers have been opened in all regional and district offices;

NHIA has put in place a toll-free line for subscribers and staff to report abuses of the processes to the headquarters. Mystery shopping<sup>9</sup> activities are carried out to uncover corrupt practices at the district and provider sites, and

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<sup>9</sup> Refers to methods used by companies to check how its products or services are being sold in the market. In such situations, an employee visits shops where the company’s products are being sold and pretends to be a customer doing shopping when in fact, he/she may not buy any products.

BNI reported having in place credible and protected mechanisms for receiving cases, complaints and other information from the public, contacts, informants, agents etc. CHRAJ and IAA also reported having in place confidential systems for the public to report corruption.

#### **v) Right to Information Law**

Parliament of Ghana and AG are assigned the role under the NACAP to enact the Right to Information Law. By the close of the reporting period the Right to Information Bill, 2013 was still at the consideration stage in Parliament.

#### **vi) Surveys**

GACC, together with GII and SEND Ghana as part of the ADISS project, undertook a National Corruption Perception Survey in 50 districts. In all, 17,831 respondents were covered in the survey. The finding of that survey was yet to be released as at the time of the reporting period.

#### **vii) Auditing of State Institutions**

The Auditor General and the IAA were the lead agencies to ensure that this activity was carried out. The Public Accounts Committee of Parliament is the collaborating agency. The specific activities outlined for this year was to identify and compile audit backlogs, publish the timetable for clearing internal audit backlogs, and assign auditors to undertake audits and report by the end of September.

IAA reported that audit backlogs had been cleared as at June 2016, and the two audit institutions were concentrating on current audits. The Agency identified 1,114 outstanding internal audit recommendations from year 2015, and another 1,171 from 2014 for follow-ups. The agency is pursuing management of MDAs and MMDAs to implement the outstanding recommendations.

#### **viii) Formulation of National Policy on NGOs Programmes**

To ensure effective and efficient coordination, monitoring and evaluation of the ever-increasing number of NGOs in Ghana, NGOs are assigned the role of developing a national NGO policy document with the MoGCSP under the Department for Social Development playing a collaborating role. The MoGCSP reported that a National Policy on NGO programmes is being considered.

#### **Key Findings, Conclusions and Recommendations**

Strategic Objective 3, which seeks the participation of the Ghanaian society in efforts to fight corruption, did not receive adequate attention from the media, CSOs and

the private sector. Although efforts were made through sensitisation programmes on corruption and training on investigative journalism for the media, no media establishment reported implementation of roles assigned under the strategic objective.

In terms of the use of audio visuals and multi-media channels, in awareness creation, a series of innovative measures were undertaken. These include platforms, such as audio, visuals, social media, public education centers, and radio jingles.

In the period under review, an initiative was made to assess public perception of the performance of ACAs. This initiative complemented previous studies commissioned by the UNDP (GaP Polls). In a similar vein, a consortium, comprising GII, GACC and SEND-Ghana commissioned an independent study aimed at assessing the performance of State anti-corruption institutions on their anti-corruption mandate under the Accountable Democratic Institutions and Systems Strengthening (ADISS) project.

The findings of the ADISS study were expected to be released or shared in 2017.

The MoGCSP was in the process of developing a National Policy on NGOs, which will ensure effective and efficient coordination, monitoring and evaluation of the ever-increasing number of NGOs in Ghana.

An improvement was also made in the development of whistleblowing mechanisms. Unlike the previous year, when IPs reported that they were in the process of providing complaint boxes, in 2016 many IPs did not only provide complaint boxes, but provided confidential email platforms, web based mechanisms and toll-free lines.

### 3.6.5. Strategic Objective 4

#### To Conduct Effective Investigations and Prosecutions of Corrupt Conduct

Thirty-two (32) Broad Activities were selected for implementation, compared to nineteen (19) in 2015. Twenty-three (23) IPs submitted reports on this strategic objective, which seeks 'To Conduct Effective Investigations and Prosecutions of Corrupt Conduct'. (See Table 17).

Table 17: List of Lead IPs Reporting and Not Reporting on Strategic Objective 4

S/No.	Lead IPs Reporting		Lead IPs Not Reporting	
	2015	2016	2015	2016
1	Audit Service	CHRAJ	Audit Service	NACOB
2	PPA	NCCE	CSOs	PPA

S/No.	Lead IPs Reporting		Lead IPs Not Reporting	
	2015	2016	2015	2016
3	EOCO	Judicial Service	ACAs	MoI
4	CHRAJ	GNPC	IFA	GIJ
5	BNI	GHANA POLICE	GHANA POLICE	GHANA POLICE
6	FIC	A-G	MoF	NATIONAL SECURITY
7	A-G	MoF	GRA	GACC
8	JUDICIAL SERVICE	PARLIAMENT OF GHANA	JUSAG	EDUCATIONAL INSTITUTIONS
9	GACC	FIC	BoG	
10	GHANA PRISONS	BNI	OHCS	
11		GII	MDAs	
12			PEF	
<b>TOTAL</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>8</b>

The IPs carried out several activities to achieve the goals of the strategic objective during the reporting period. These activities included impartial enforcement of anti-corruption laws, providing furnished office accommodation for anti-corruption Agencies, equipping anti-corruption agencies with communication and information technology for investigations, enforcement of financial management legislation, enacting a Witness Protection Law, and building the capacity of anti-corruption and law enforcement agencies.

### i) Impartial Enforcement of Anti-Corruption Laws

ACAs, LEAs and the Judicial Service are the lead and collaborating agencies to ensure implementation of this activity. Three ACAs/LEAs made up of EOCO, CHRAJ and BNI, who are part of Lead IPs expected to implement this activity, presented their reports on implementation of this activity as indicated below in Table 18.

Table 18: Number of Corruption Cases Processed<sup>10</sup>

No.	IP	Cases Received Initiated		Change %	Cases Investigated/ Concluded		Change %
		2015	2016		2015	2016	
1	CHRAJ	51	59	15.7	26	31	19.2
2	EOCO	NR	15		NR	8	
3	BNI	NR	150		NR	200	
<b>Total</b>		<b>51</b>	<b>224</b>		<b>26</b>	<b>239</b>	

<sup>10</sup> Cases processed include cases carried from the previous year.

EOCO reported receiving fifteen complaints and petitions on allegation of corruption, with most of the suspects arrested and arraigned before the courts. CHRAJ reported 59 cases on corruption, whilst the BNI reported 150 corruption cases. EOCO reported having completed investigation of eight (8) cases, CHRAJ 31, and BNI, 200 (the 200 includes cases carried over from 2015). [NB: EOCO and BNI did Not Report (NR) on this activity in 2015.]

## **ii) Enact Witness Protection Law**

By the end of 2016 when the term of the Sixth Parliament the Fourth Republic ended, the Witness Protection Bill, 2015 was still at the committee stage.

## **iii) Enforce Financial Management Laws<sup>11</sup>**

All MDAs/MMDAs that reported on this activity reported they complied with the financial management laws, the Public Procurement and IAA Act. Prompt sanctioning of persons who violate the Public Financial Management laws is a key activity under NACAP. Unfortunately, not much activity was recorded as only EOCO reported having sanctioned persons who violated the FM law.

## **iv) ICT Equipment in Support of Investigations and Intelligence**

During the period, 4 agencies- CHRAJ, FIC, EOCO and BNI reported receiving over 50 items including computers, cell phones, GOTAs, fax machines; transmitters, recorders and cameras to enhance effective investigations and intelligence gathering on corruption cases nationwide.

CHRAJ received 10 mini notebooks and 10 Desktops from GIFEC in August, and 10 Dell Desktops and Accessories from Ministry of Energy for its work. The BNI procured computers, Gotas, Cell phones, Fax machines, transmitters, recorders and Cameras for its 22 Regional and Divisional Commands. FIC and EOCO also reported securing communication network and IT Infrastructure, including mobile phones, to enhance effective investigations and intelligence gathering.

## **v) Intelligence and Assets Recovery Training**

As part of the NACAP 2016 AWP, two officers from each of the Lead Implementing Agencies were to be trained in basic investigation techniques, basic drug law enforcement, basic intelligence, asset tracing, and money laundering.

- Selected officers from EOCO received training in basic intelligence, investigative skills, Asset Tracing and Recovery, Money laundering, Terrorism

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<sup>11</sup> Financial Administration Act, Internal Audit Agency Act Public Procurement Act.

Financing, Anti-Corruption and Drug Law Enforcement and Prosecutions and Confiscation of Tainted Properties.

- CHRAJ and EOCO also reported having participated in Inter-Governmental Experts Group meetings on Asset Recovery under UNCAC.
- BNI also had over 50 of its officers trained in intelligence related works.
- Members of staff in various functional units of the FIC received training on Techniques in Financial Intelligence Analysis;
- BNI trained 20 officers whereas with FIC eleven (11) staff were trained in Financial Crime Investigation, Asset Tracing and Recovery in Accra.
- FIC organised three training sessions for Senior Officers of Ghana Police Service at the Ghana Police Command and Staff College at Winneba.

#### **vi) Implement Memorandum of Understanding (MOU) on Information Sharing**

Under this broad activity, IPs were to implement an MOU on information sharing and joint investigations. EOCO collaborated effectively with the NACOB, FIC, Ghana Police Service and CHRAJ and other international partners to fight corruption and other forms of organised crimes.

#### **vii) Expand Computerised System of Selecting Judges to Preside Over Cases**

Under the NACAP, the Judiciary is required to extend its computerization programme to all Courts to facilitate expeditious trial of corruption offences prosecuted before them. Under the 2016 AWP, the process of automating the courts was to continue in earnest across the country.

The Judicial Service reported that Electronic Case Distribution System (ECDS) was installed at all levels of law courts in all regions of Ghana. In all, 63 more courts were covered.

#### **viii) Organise ICT Training for Judicial Service Staff**

This indicator was to measure the number of Judicial Service staff trained in the Electronic Case Development System and ICT in general. The Judicial Service reported that it trained 145 Members of Staff including Judges on the use of the ECDS and ICT.

#### **ix) Resource Anti-Corruption Institutions**

EOCO received tremendous support from the Government of Ghana, anti-corruption institutions and other development partners to perform its mandates.



## x) Strengthen the National Coordination Capacity in Combating TOC

Eight (8) Bills were passed by Parliament and another 8 were still pending in the period under review (See Table 19 below).

Table 19: Number of Anti-Corruption Legislations Passed and Pending

S/No.	Anti-Corruption Legislations 2015/2016	Passed	Pending
1	Public Procurement (Amendment) Act, 2016 (Act 914)		
2	Companies (Amendment) Act 2016 (ACT 907)		
3	Petroleum Revenue Management (Amendment) Bill, 2015		
4	Banks and Specialised Deposit Taking Institutions, 2015 (ACT 930)		
5	Ghana Deposit Protection ACT, 2016 (ACT 931)		
6	Revenue Administration ACT, 2016 (ACT 915)		
7	Public Financial Management ACT, 2016 (921)		
8	Bank of Ghana (Amendment) Bill 2016		
9	Local Governance Bill, 2016 (Act 936)		
10	Transfer of Convicted Persons (Amendment) Bill, 2014		
11	Narcotics Control Commission Bill, 2015		
12	Petroleum Revenue Management (Amendment) Bill, 2015		
13	Witness Protection Bill, 2015		
14	Right to Information Bill		
15	Conduct of Public Officer' Bill, and		
16	Whistleblower (Amendment) Bill		

EOCO reported that there is inter and intra agency cooperation and coordination with the other ACAs i.e. Police BNI, NACOB, FIC, CHRAJ, and National Security Council Secretariat.

The US Government through a collaborative programme with AGs department, organised workshops and training programmes for attorneys in the Attorney General's Department. FIC organised a series of workshops in August for accountable institutions and other stakeholders to prepare them for the Anti-Money Laundering Mutual Evaluation on Ghana. In all, 105 persons participated in the workshops.

## xi) Organise Study Sessions about Money Laundering

EOCO and FIC reported they they collaborated with financial institutions to counter money laundering and terrorism financing. FIC trained 155 officers in the fight against Money Laundering and Financial Crime Investigations.



Ministry of Communication, on its part reported that E-Justice and E-Immigration implementation policy was ongoing.

### **Key Findings Conclusions and Recommendations**

Strategic Objective 4 focuses on two main areas, namely strengthening the capacity of anti-corruption institutions to investigate and prosecute corruption offences or complaints and apply sanctions where warranted.

In 2016, activities outlined for that purpose included providing appropriate office environment, tools, equipment and other logistics to ACAs to enhance investigations and strengthening the anti-corruption legal framework. Although some modest progress was made during the year in this regard, the same was not significant given the enormous responsibilities the ACAs/LEAs. CHRAJ, for example, could not carry out some critical coordinating activities because of needed resources.

One significant achievements made in the anti-corruption legal framework is the enactment of the Companies (Amendment) Act, 2016 (Act 920) and Public Financial Management Act; which provides for transparency of beneficial ownership information for the purposes of dealing with illicit money transfers, money – laundering and related crimes.

Fighting corruption requires huge investment. Investment in institutions, laws, in education and prevention, and of course, in investigation and prosecution of corrupt offences. The returns on the investment in the fight against corruption are incalculable.



## **SECTION FOUR: FINDINGS, RECOMMENDATIONS AND CONCLUSION**

### **4.1. Summary of Findings**

- i. Implementation of NACAP is gradually picking up, albeit, at a very slow pace. Although the number of Broad Activities implemented increased from 57 in 2015 to 86 in 2016, the depth/level of implementation was still not satisfactory as only a few IPs reported.
- ii. Although the number of IPs increased from 19 in 2015 to 56, this was still not impressive, given that 325 IPs were served with the 2016 AWP. This represents only 17% return.
- iii. Under Strategic Objective One (1), Seventeen (17) Broad Activities were selected for implementation compared to nine (9) in 2015. About ten thousand, two hundred and fifty-nine (10,259) sensitization programmes were carried out on NACAP and corruption generally, compared to seven hundred and sixty-five (765) in 2015, representing about 1300% increase. A number of initiatives were introduced to prevent and reduce opportunities for corruption, among them, Sexual Harassment Policies, Internal Controls, Ant-Corruption Provisions in Contracts, and Safe Reporting Systems.
- iv. Under Strategic Objective Two (2), Twenty-three (23) broad activities were selected for implementation in 2016 as against 26 in 2015. Key initiatives taken in the year include Computerization of Revenue Sector, Extension of EITI Principles to Oil and Gas Sector, Introduction of Customer Service Charters, Compliance Tools for Codes of Conduct and Conflict of Interest Rules, Enhancing Transparency in appointments of CEOs and Chief Directors in the Public Sector, Improving Security of Examination Materials and Centres, and Risks Assessment and Systems Examination of certain public service institutions.
- v. Under Strategic Objective Three (3), Fourteen (14) broad activities were selected for implementation in 2016, as against 26 in 2015. Among the initiatives to achieve the above Objective were Sensitization Programmes for the Media and Civil Society, Guidelines on Whistleblowing Disclosures, Use of Social Media, Public Surveys and Studies on Corruption, and Formulation of National Policy on CSOs. The Right to Information Bill, which is key to this Objective, was not passed.

- vi. Not much was achieved under Strategic Objective Four (4). Thirty-two (32) broad activities were selected for implementation in 2016 as against 19 in 2015. Once again, poor resourcing of the lead institutions robbed the nation of robust deterrence system to punish and discourage offenders. Among the initiatives taken in the year were Acquisition of some basic Tools and ICT Equipment for Investigations, Training on Intelligence, Assets Recovery, and Money Laundering and Terrorism Financing, and Expansion of the Court Computerization Programme and Electronic Case Distribution System (ECDS). Eight (8) Bills were passed under the Objective, with eight (8), (including the two oldest Bills namely the Right to Information Bill and the Conduct of Public Officers Bill) still outstanding at close of the year.
- vii. In 2016, a new component was also introduced, captioned General Roles, which was considered foundational for all IPs, under which all IPs were required to implement activities that would soar up integrity, transparency and accountability in all sectors of the Society.
- viii. At the end of 2016, the second year of implementation, not all the Activities that were to be implemented within the Short Term (2-year period) had commenced. The remaining Short Term Activities have accordingly been included in the 2017 AWP.

## 4.2. Recommendations

A stakeholder consultation workshop, drawn from key IPs, Civil Society Organizations (CSOs), Media organizations, Faith Based Organizations (FBOs), and private sector organizations should be organized to review, build consensus and develop and adopt strategies to enhance participation of all stakeholders in the implementation of NACAP annual activities.

- i. Investing in the fight against corruption is critical for the success of any anti-corruption strategy and effort. Government must invest extensively in the fight against corruption knowing that any such spending will yield enormous benefits to the nation.
- ii. Government must increase funding support to CHRAJ through its annual budgetary allocation to enable it play its coordinating role effectively.
- iii. CHRAJ must engage more regularly with the IPs and improve communication with IPs to grow responsiveness of IPs, especially with their reporting obligations.
- iv. Helping IPs to appreciate the immense benefits of implementing NACAP at both institutional/individual and national levels, and motivating them to put in efforts and resources is critical to make the NACAP initiatives succeed. The NACAP Communication Strategy may come in handy here, but there should be other Government Policies and Interventions to incentivize IPs (Public, Business and Civil Society) to prioritize implementation of NACAP and the fight against corruption generally.

### 4.3. Conclusion

Implementation of NACAP recorded some modest growth in 2016, the second year of implementation, although not all the Short Term Activities could be implemented by the end of the 2-year period.

Generally, institutional participation in the implementation and reporting on the NACAP increased in 2016, from a total of 19 IPs that reported in 2015 to 56 IPs reporting in 2016, but the level of participation was still disappointing.

The number of Broad Activities implemented increased from 57 in 2015 to 86. Sensitization on NACAP shot up by 1300% over the 2015 performance. This notwithstanding, the level of implementation was below expectation.

Areas that saw significant improvements in terms of programmes and activities implemented by IPs included public education and awareness creation on corruption and related crimes, promoting integrity in organisations, staff capacity development and development of whistleblowing and other reporting mechanisms. Other areas that also saw modest improvement include the use of technology and multimedia channels in awareness creation, and the conduct of national surveys and corruption studies. In short, knowledge and awareness of NACAP and threat of corruption increased during the period.

Political Will is not demonstrated only in words, but more importantly, in putting your money where your mouth; i.e. complementing pronouncements with adequate resource allocation/funding. Funding support from Government for the implementation of NACAP in 2016 was woefully inadequate. This coupled with late releases of approved budgetary allocation, delayed much of CHRAJ's coordination activities, and prevented it altogether from carrying out some of the key planned activities. If this trend is not reversed quickly, NACAP may miss most its targets and key objectives.

In conclusion, the implementation of NACAP is gradually picking up steam, although it is conceded that progress has been slow. Anti-corruption effort has moved away from rhetoric and mere complaining and criticising, to more definite and concrete actions, with anti-corruption now occupying the centre stage of national interest and agenda. In spite of all its shortcomings, NACAP has become the vehicle for mobilising efforts and resources of stakeholders to systematically fight and win the war against corruption. We are on course.

## 4.4. Outlook for 2017

For 2017, the AWP will focus on the following, among others:

- i. Complete implementation of all outstanding Short Term activities in 2017.
- ii. Conduct End of Term evaluation of the Short Term (2-year) Programmes.
- iii. Explore solutions to poor funding for the implementation of NACAP. As noted above, funding for implementation of NACAP is still low.
- iv. Explore Strategic measures to increase the participation of IPs in the implementation of NACAP in the 2017 AWP. In particular, extra effort would be made to grow the interest of more CSOs, media, private sector organisations and faith based organisations to implement and report on NACAP.

## **APPENDICES<sup>12</sup>**

**Appendix 1: 2016 Annual Work Plan**

**Appendix 2: Institutions Reporting by Strategic Objective**

**Appendix 3: Consolidated Data/Responses by IPs**

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<sup>12</sup> Omitted but available

