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PROGRESS REPORT
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NATIONAL ANTI-CORRUPTION ACTION PLAN (NACAP)



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Richard Quayson
Ag. Commissioner, CHRAJ

III. LIST OF ACRONYMS

| | |
|--------|---|
| ACA | Anti-Corruption Agency |
| A-G | Attorney-General |
| APNAC | African Parliamentarians Network Against Corruption |
| APR | Annual Progress Report |
| ARIC | Audit Report Implementation Committee |
| AU | African Union |
| AuG | Auditor-General |
| BNI | Bureau of National Investigation |
| BOG | Bank of Ghana |
| CAGD | Controller and Accountant General's Department |
| CHRAJ | Commission on Human Rights and Administrative Justice |
| CSO | Civil Society Organisation |
| EC | Electoral Commission |
| ECOWAS | Economic Community of West African States |
| EOCO | Economic and Organised Crime Office |
| FIC | Financial Intelligence Centre |
| FWSC | Fair Wages and Salaries Commission |
| GACC | Ghana Anti-Corruption Coalition |
| GAS | Ghana Audit Service |
| GES | Ghana Education Service |
| GHS | Ghana Health Service |
| GII | Ghana Integrity Initiative |
| GJA | Ghana Journalists Association |
| GRA | Ghana Revenue Authority |
| HiLIC | High Level Implementation Committee |
| IAA | Internal Audit Agency |
| IEA | Institute of Economic Affairs |
| JS | Judicial Service |
| JUSAG | Judicial Staff Association of Ghana |

| | |
|---------|--|
| M&E | Monitoring & Evaluation |
| MDAs | Ministries, Departments and Agencies |
| MLGRD | Ministry of Local Government and Rural Development |
| MMDAs | Metropolitan, Municipal and District Assemblies |
| MoE | Ministry of Education |
| MoF | Ministry of Finance |
| MONICOM | Monitoring & Evaluation Committee |
| NACAP | National Anti-Corruption Action Plan |
| NACOB | Narcotics Control Board |
| NCCE | National Commission for Civic Education |
| NDPC | National Development Planning Commission |
| NEAC | National Ethics Advisory Committee |
| NISU | NACAP Implementation Support Unit |
| NVTI | National Vocational Training Institute |
| OHCS | Office of the Head of Civil Service |
| OoP | Office of the President |
| PAC | Public Accounts Committee |
| PEF | Private Enterprises Federation |
| PPA | Public Procurement Authority |
| PSC | Public Services Commission |
| PSO | Public Service Organisation |
| PSRS | Public Sector Reform Secretariat |
| PURC | Public Utilities Regulatory Commission |
| RCC | Regional Co-ordinating Council |
| SEC | State Enterprises Commission |
| SEND | Social Enterprise Development Foundation |
| UN | United Nations |
| UNCAC | United Nations Convention Against Corruption |
| UNDP | United Nations Development Programme |
| WAEC | West African Examination Council |

IV. EXECUTIVE SUMMARY

1. This report represents an account of the responsibility reposed in Commission on Human Rights and Administrative Justice (CHRAJ), the National Development Planning Commission (NDPC) and Monitoring & Evaluation Committee (MONICOM) to monitor and track the progress of implementation of National Anti-Corruption Action Plan (NACAP) and present periodic and annual reports on progress of implementation. The report covers the period January 1–September 30, 2015.
2. One of the major strategies initiated by the Government of Ghana to address corruption, generally understood as the misuse of entrusted power for private gain, is the ten-year NACAP developed and adopted as a non partisan strategy for implementation over the next ten years.
3. The strategic objectives of NACAP are to:
 - Build public capacity to condemn and fight corruption and make its practice a high-risk, low-gain activity;
 - Institutionalize efficiency, accountability and transparency in the public, private and not-for profit sectors;
 - Engage individuals, media and civil society organisations in the report and combat of corruption; and,
 - Conduct effective investigations and prosecution of corrupt conduct.
4. In order to ensure effective and efficient implementation of the NACAP, an institutional and implementation framework was established at the inception of the Plan.
5. The High Level Implementation Committee (HiLIC), chaired by the Chief of Staff, draws its membership from the Public Service, Anti-Corruption Agencies (ACAs) with representation from the Private Enterprise Federation (PEF) and Civil Society Organisations (CSOs).
6. HiLIC is responsible for providing policy and strategic direction and advice to implementing agencies/bodies. It facilitates the integration of NACAP into agencies and organizations' annual programme of work; ensuring inclusiveness, local ownership, and commitment.

7. A key component of the implementation arrangements is the MONICOM which oversees the M&E activities of NACAP.
8. The implementing Agencies including individuals and citizens constitute the backbone for the implementation of NACAP. They are responsible for ensuring that NACAP activities are incorporated and mainstreamed into their respective medium term development plans and annual work plans for implementation. Citizens and the general public have a role to resist and report corruption.
9. In view of the limited resources available for 2015 the Work Plan focused on a total of 57 activities (out of a total of 143 for the ten years), spread across the four (4) strategic objectives of NACAP.
10. The selected activities revolved around self-regulation, policy, decision-making, enactment of legislation, and the use of existing resources/ facilities, which did not require substantial financial outlays to implement.
11. Forty-three (43) implementing agencies including MDAs/ MMDAs, private and civil society organisations were involved in the implementation of the activities of the 2015 Work Plan. The implementing agencies involved, especially the public sector agencies, were expected to work out their respective detailed strategies and secure the resources necessary to carry out the activities and report to MONICOM at the CHRAJ.
12. Nineteen (19) of the forty-three (43) agencies involved in the implementation of the 2015 work plan submitted to MONICOM at CHRAJ, completed data collection tool on the activities they had implemented in the period.
13. **Strategic Objective 1: Building Capacity to Condemn and Fight Corruption and to Make Corruption a High-Risk, Low-gain Activity**
 - i. The main activities carried out under this Strategic Objective, were sensitization workshops, seminars, and dissemination of anti-corruption materials, undertaken mainly by CHRAJ, OoP, GACC, GII and SEND Ghana, in collaboration with other key stakeholders.
 - ii. A total of 180 media practitioners, 780 public officers from RCCs and MMDAs participated. 1705 Males and 1174 females (of which 531 are female PWDs) benefited from the public education programmes.
 - iii. CHRAJ organized 761 public education programmes on corruption and the Whistleblower Act at the District level and distributed over 3,000 materials on anti-corruption. The GACC also distributed 7,451 materials on anti-corruption through various media and fora.

- iv. These activities were intended to enhance the general knowledge and understanding of corruption and NACAP of the target groups, thereby enabling them to resist and report corrupt practices.

14. Strategic Objective 2: Institutionalizing Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors

- i. Eighteen (18) out of the twenty-six (26) activities under Strategic Objective 2 have been implemented with varying degrees of success.
- ii. Three hundred and twenty-two (322) ARICs been formed as against the expected total figure of 394. This represents 81.7% of the expected, which is quite commendable. Training has also been organized as part of the planned activities for members of ARICs from five (5) agencies, namely, PURC, Energy Commission, Korle Bu Teaching Hospital, Ghana Prisons Service and the GHS. Measures are being pursued to have the remaining 18.3% of the organizations to establish ARICs to ensure that adverse audit findings are addressed to enhance efficiency in public financial management.
- iii. CHRAJ collaborated with Parliament of Ghana through the Constitutional, Legal and Parliamentary Affairs Committee to advance work on the Conduct of Public Officers' Bill, 2013, which is at the consideration stage. The draft Code of Conduct for MPs is also under consideration by a Committee of Parliament.
- iv. Open, competitive, merit-based recruitment processes have been used by the PSC and OHCS to recruit CEOs and Chief Directors/Directors during the reporting period. Vacant positions in the public service are advertised in the most widely circulated national dailies and websites of the PSC and OHCS.
- v. In terms of building capacity for investigating breaches of the Code of Conduct for Public Officers, CHRAJ has organized training programmes for 115 regional and district directors, and HQ investigators. CHRAJ, in conjunction with the PSC, also organized a 3-day training programme on ethics and integrity for public officers from 35 institutions.
- vi. The EC has organized awareness creation programmes and events to enforce political parties' law. The EC was able to organized 11 media encounters, 20 events with CSOs, 20 with PWDs, and 10 with the

visually impaired. The commission has had 126 television slots, 49 documentaries and drama and 140 radio jingles. In all the EC organised a total of 376 awareness creation programmes on the need to enforce laws in general and the political party law in particular within the reporting period.

15. Strategic Objective 3: Engaging Individuals, Media And Civil Society Organizations In Reporting And Combating Corruption

- i. CHRAJ has developed Guidelines on receiving and processing of information by whistleblowers to operationalize disclosures under the Whistleblower Act. EOCO was also in the process of developing guidelines for receiving whistleblower complaints.
- ii. With regard to the provision and placement of complaint boxes at vantage points in the MDAs and MMDAs, the Office of the President (OoP) has taken the lead to provide suggestion boxes for handling staff complaints. Other reporting agencies indicated they were in the process of providing complaint boxes.
- iii. The IAA received 425 out of an expected 788 quarterly audit reports for monitoring. Defaulting MDAs and MMDAs have been written to submit their audit reports.

16. Strategic Objective 4: Conducting Effective Investigations and Prosecution of Corrupt Conduct

- i. Nineteen activities were planned under this objective. These revolved around ratification of international conventions on corruption, money laundering and transnational organized crime, sanctioning of persons who violate the public financial management laws, training and capacity building.
- ii. The United Nations Convention against Transnational Organized Crime (Palermo Convention), 2012, was ratified by Ghana in 2014 prior to the adoption of NACAP. A draft Bill on Corruption, Money Laundering and Transnational Organized Crime has been prepared and is being processed for passage into law.
- iii. Only one agency, EOCO, indicated that it had prosecuted persons who had violated the public financial management laws. In addition EOCO had developed timelines for the prosecution of cases. However, there was no data provided on the number of people prosecuted for breach of the laws.

- iv. CHRAJ and EOCO reported of organizing training, locally and internationally, for their investigators. The Judicial Service trained 487 staff in ICT during the reporting period while Public Procurement Authority organized 8 training sessions on public procurement for 500 public officers.
- v. Concerning the use of ICT to reduce opportunities for Corruption, the Judicial Service extended its computerized system of assigning cases to judges to cover all courts, both superior and lower courts throughout the country.

17. CHALLENGES ENCOUNTERED

- i. The participation of MDAs and MMDAs in the implementation of NACAP has been low. Only 19 out of the 43 institutions that were given the reporting tool and trained on how to use it, reported on the usage of the reporting tool during the first reporting period.
- ii. There is lack of adequate knowledge about NACAP, institutional responsibilities, sense of ownership, and commitment on the part of some heads of MDAs and MMDAs.
- iii. Institutional representatives at HiLIC meetings, in some cases, lacked authority to implement decisions taken by HiLIC on return to their organizations. There have been changes of institutional representatives to MONICOM and HiLIC meetings by some institutions, resulting in lost of institutional memory on decisions taken relating to NACAP activities in those institutions.
- iv. MDAs and MMDAs had limited capacity, knowledge and understanding of how to report on the indicators using the monitoring and evaluation tool.
- v. There is lack of baseline data on the high-level key performance indicators for NACAP to provide the basis for determining performance indicators at the institutional level.
- vi. Inadequate budgetary or lack of provision in the 2015 estimates for NACAP at the level of the MDA or MMDA meant that many of the activities planned could not be undertaken. CHRAJ in particular was heavily underfunded, although it had specifically budgeted for its extensive role in the implementation of NACAP. This, to a large extent, undermined its capacity to achieve set targets, including a baseline study on the state of corruption at the commencement of implementation of NACAP.

18. CONCLUSIONS

- i. The progress made in the first year of implementation of NACAP indicates that the country is ready and willing to confront corruption together. Despite that preparatory work continued into the mid year, a good number of implementing agencies were able to implement a significant number of programmes assigned to them under NACAP.
- ii. Public awareness and education programmes targeted at enhancing the capacity of the public to resist and report corruption were undertaken. The general public benefitted including men, women, youth and persons with disability.
- iii. Additionally, measures were initiated on the enforcement political party law and to depoliticise corruption and crime, which are critical components of dealing with corruption in the country.
- iv. Most importantly, law enforcement and anti-corruption agencies have made significant progress on how to coordinate their activities, share information more regularly and undertake joint investigations were warranted.

19. RECOMMENDATIONS

- i. Government should adequately resource CHRAJ to enable the latter develop the capacities of the MDAs and MMDAs to get more understanding of their roles, the completion of the reporting tool, and what possible measures or actions they could implement to support NACAP.
- ii. The capacities of NISU and MONICOM should be strengthened to be able to respond effectively to challenges faced by organizational representatives, with a follow-up regime.
- iii. MONICOM should review the Monitoring and Evaluation Tool with the aim of: simplifying it to enhance understanding and operationalizing it to capture the key performance indicators on the hierarchy of the monitoring and evaluation results chain, namely, outputs, outcomes and impacts, under each of the four strategic

objectives of NACAP at the individual institutional level.

- iv. Heads of Institutions should re-double their efforts at making the Monitoring and Evaluation function in each implementing institution more effective to enable the institution achieve NACAP's objectives.
- v. An effective communication strategy should be developed to serve as the mechanism for sensitising the general public on the activities of NACAP and dissemination of the achievements and lessons learnt.
- vi. Every effort should be made to ensure that the baseline survey is conducted as soon as practicable to set bench marks against which future achievements on NACAP can be evaluated.
- vii. In order to enhance compliance with His Excellency, the President's Directive on NACAP implementation, the Office of the Chief of Staff should write to all the heads of agencies that did not comply with the directive to explain why disciplinary action should not be taken against them.
- viii. Finally, we cannot stress enough the central role CHRAJ plays in the coordination and implementation of the NACAP, and the need to resource it adequately to be able to play that role.

SECTION ONE

1.0. INTRODUCTION AND BACKGROUND

1.1. Introduction

The Commission on Human Rights and Administrative Justice (CHRAJ) was established to, among others; investigate complaints of corruption, abuse of office by public officers, instances of alleged or suspected corruption and the misappropriation of public monies by officials. It is also to investigate 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).

In July 2009, the CHRAJ was entrusted with the responsibility of coordinating the development of a non-partisan strategy and plan for combating corruption in the country. The CHRAJ, through a 25 Member Multi-stakeholder Working Group, developed a ten-year national strategy and plan to combat corruption, the 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 3rd July, 2014.

The CHRAJ was assigned the responsibility of coordinating and monitoring the implementation of NACAP working in close collaboration with the National Development Planning Commission (NDPC) through a Monitoring Committee (MONICOM) comprising ten (10) representatives. The institutions and organisations represented on MONICOM are CHRAJ, National Development Planning Commission, Public Services Commission, State Enterprises Commission, Private Enterprises Federation and the Ghana Anti-Corruption Coalition (GACC).

This report represents an account of the responsibility reposed in CHRAJ, NDPC and MONICOM to monitor and track the progress of implementation of NACAP and present periodic and annual reports on progress of implementation. It covers the period January 1–September 30, 2015.

1.2. Background

Generally understood as the misuse of entrusted power for private gain, corruption erodes the moral fabric of society and violates the social and economic rights of the poor and the vulnerable; undermines democracy and the rule of law

and erodes the quality of life of citizens. It leads to violations of human rights, promotes political instability, undermines economic development and the ability of Governments to deal effectively with poverty, organized crime, terrorism and other threats to human security. Corruption also results in the loss of legitimacy, public confidence in systems and institutions and respect for constituted authority.

To deal with the canker of corruption, the National Anti-Corruption Action Plan (NACAP) was developed under the coordination of the Commission and with funding support from DANIDA. NACAP was finally adopted by the Parliament of Ghana as a non partisan strategy and plan for implementation over the next ten years.

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

One of the major strategies initiated by the Government of Ghana to address corruption is the ten-year NACAP developed based on consultations and consensus reached among key stakeholders from the public and private sectors, anti-corruption organisations and CSOs and adopted by Parliament.

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.

Its main purpose 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 the creation of a sustainable democratic society founded on good governance and imbued with high ethics and integrity.

Mission: 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 are to:

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 civil society organisations in the report and combat of corruption, and
4. Conduct effective investigations and prosecution of corrupt conduct.

The scope of the NACAP goes beyond controlling 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 the programme of work, each stakeholder has been assigned roles under each of the strategic objectives, either as lead or co-implementer.

The roles should be implemented in the short to long-term periods. The stakeholders are:

- 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.

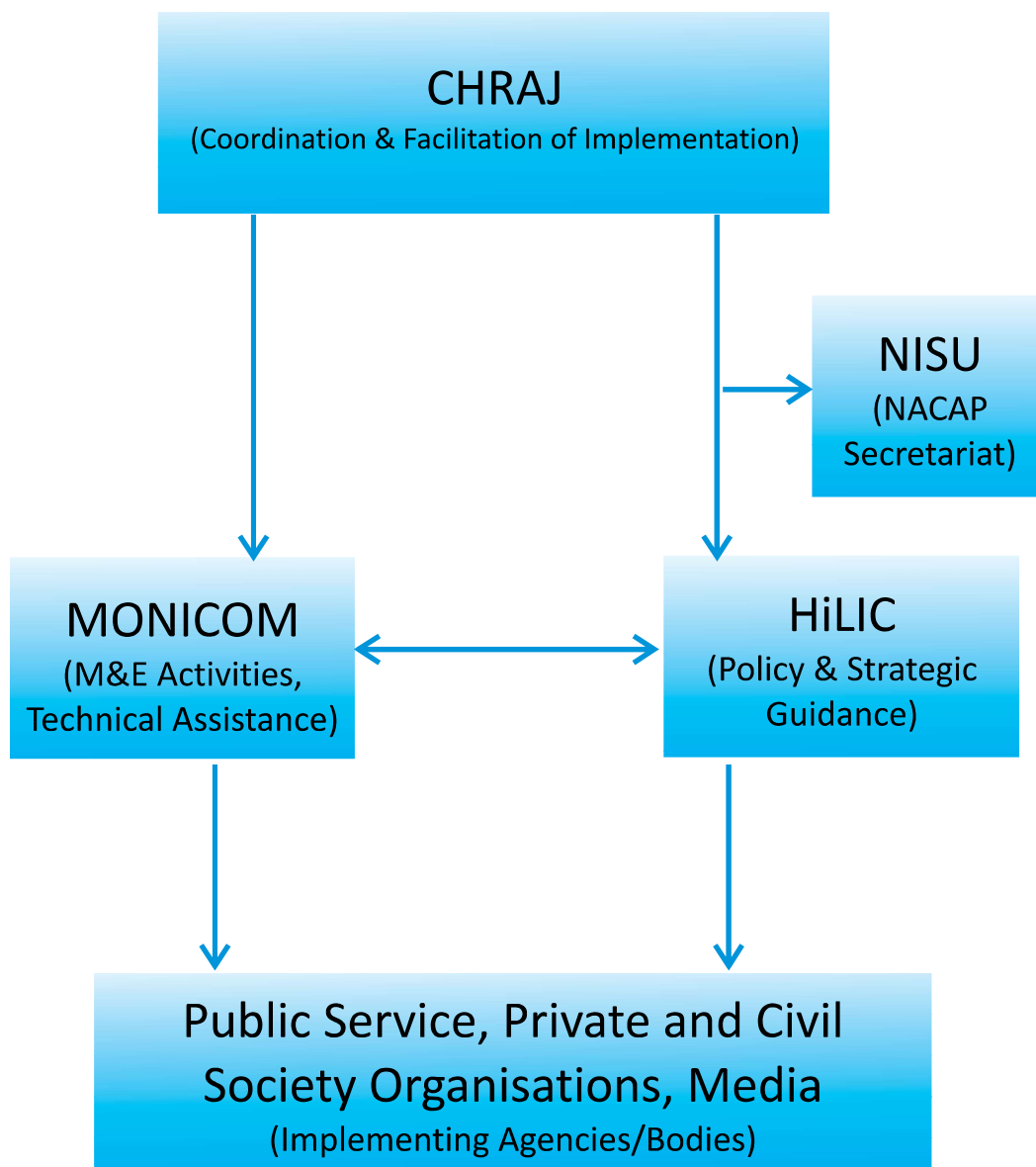
The effective implementation of the NACAP should result in enhanced levels of integrity, reduced corruption, improved economic performance, and accelerated development of Ghana.

SECTION TWO

2.0. INSTITUTIONAL & IMPLEMENTATION ARRANGEMENTS

In order to ensure effective and efficient implementation of the NACAP, the following institutional and implementation arrangements were established at the inception of the Plan 2015 (See Figure 1).

Figure 1: Institutional Arrangement for Implementation



2.1. The High Level Implementation Committee

The High Level Implementation Committee (HiLIC), chaired by the Chief of Staff, consists of not more than twenty (25) members, including the Ag. Commissioner of CHRAJ as the Vice Chair, the Director, Anti-Corruption of CHRAJ, as the Secretary/member and heads/representatives of the following:

- Parliament of Ghana;
- Auditor Service;
- Public Services Commission;
- Internal Audit Agency;
- CHRAJ;
- Economic and Organised Crime Office (EOCO);
- the Ministry of Justice and Attorney-General's Department (MOJAGD);
- State Enterprises Commission (SEC);
- Ministry of Finance (MoF);
- Controller and Accountant General's Department (C&AGD);
- Office of the President (OoP);
- Ghana Health Service (GHS);
- Ghana Education Service (GES);
- National Development Planning Commission (NDPC);
- Judicial Service;
- Ministry of Local Government and Rural Development;
- Ghana Police Service;
- Office of the Head of Civil Service (OHCS);
- Private Enterprises Federation (representing the private sector), and
- Ghana Anti-Corruption Coalition (GACC), representing civil society organisations.

The responsibilities of the HiLIC, which is required to meet, at least, four times a year, are to:

- ensure inclusiveness, local ownership and effective implementation of NACAP;
- provide policy and strategic direction and advise to implementing agencies/bodies for NACAP implementation;
- facilitate the integration of NACAP's programmes in agencies and organizations' annual programme of work;
- review MONICOM reports;
- organize annual forum (a) to provide platform for the public to engage stakeholders on anti-corruption efforts;

¹The representatives are supposed to either be Heads of the institutions or personnel at the senior management level

- facilitate continuous dialogue between Government and Stakeholders for the systematic and effective implementation of NACAP;
- facilitate mobilization and timely release of financial resources for the implementation of NACAP; and
- Review quarterly and annual reports on the achievements of the implementation of the Plan and ensure the effective dissemination of the same to implementing partners, key stakeholders including the Office of the President and the general 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 the implementation of the Plan. The M & E activities would provide the requisite data/ information to guide and inform decision making with regard to resource needs and allocation for the implementation of NACAP; 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 Monitoring and Evaluation Committee (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:

- facilitation of the preparation of a monitoring and evaluation plan for NACAP;
- assisting to develop, review and administer monitoring and evaluation instruments for the collection of data on the implementation of NACAP;
- conducting periodic monitoring and evaluation capacity building needs of implementing agencies for implementation to enhance their knowledge and skills;
- assisting in conducting action research to address emerging issues during the implementation of NACAP;
- preparing and disseminating performance results of the implementation of NACAP to key stakeholders and the general public.

2.3. NACAP Implementation Support Unit

The NACAP Implementation Support Unit (NISU) is located at CHRAJ and serves as the NACAP secretariat, which provides administrative support to HiLIC and MONICOM. More specifically, the responsibilities of NISU include the following:

- preparing minutes of meetings and reports;
- preparing quarterly and annual progress reports for the approval of HiLIC;
- assisting in developing and administering data collection tools, and processing and analyzing of data collected from implementing agencies;
- receiving enquiries from public/implementing agencies on NACAP for processing by appropriate persons;
- providing information to the general public on NACAP, and
- organising meetings and other incidental activities.

The above functions are additional to the functions of CHRAJ officers as either anti-corruption or human rights investigators.

2.4. Public, Private and Civil Society Organizations²

The last component of the institutional and implementation arrangements consists of the implementation agencies. They include all the identified key public, private and civil society organizations whose involvement are 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 and annual work plans 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 submission to the same. The implementation agencies are also required to organize capacity building activities for their staff to enable them deliver on the objectives of NACAP as well as sensitize key stakeholders on their service charters.

2.5. NACAP Annual Work Plan For 2015

The NACAP has a total of 135 broad activities spanning over a 10 year-period, some of which have to be implemented within two (2) years-short term, others in the medium term (up to five years) and the rest within ten years (long term). These activities have been grouped under the four strategic objectives of NACAP.

² Includes media, faith based organisations and civic groups

In view of the limited resources available for 2015 the Work Plan focused on a total of 57 activities, spread across the four (4) strategic objectives of NACAP (see Table 1).

Table 1: Distribution of Selected Activities Among NACAP Strategic Objectives for the 2015 Work Plan

| No. | NACAP Strategic Objectives | Activities for 10 year period | Activities for 2015 |
|-------|--|-------------------------------|---------------------|
| 1 | Build capacity to condemn and fight corruption and make it a high-risk, low gain activity | 28 | 5 |
| 2 | Institutionalize efficiency, accountability and transparency in Public and Private Service, | 45 | 24 |
| 3 | Engage individuals, media, and civil society organizations in Reporting and combating corruption | 16 | 11 |
| 4 | Conduct effective investigations and prosecution for corrupt conduct | 46 | 17 |
| Total | | 135 | 57 |

The selected activities revolved around self-regulation, policy, decision-making, enactment of legislation, and the use of existing resources/ facilities, which did not require substantial financial outlays to implement. Thus, the MDAs/ MMDAs involved were expected to work out their respective detailed strategies and secure the resources necessary to carry out the activities and report to MONICOM at the CHRAJ.

Forty-three (43) implementing agencies including MDAs/ MMDAs, private and civil society organisations were involved in the implementation of the activities of the 2015 Work Plan. The implementing agencies involved, especially the public sector agencies, were expected to work out their respective detailed strategies and secure the resources necessary to carry out the activities and report to MONICOM at the CHRAJ.

Forty-three (43) MDAs/ MMDAs were involved in the implementation of the activities of the 2015 Work Plan (See Table 2 & Appendix 3).

Table 2: Strategic Objectives & Implementing Institutions (2015)

| STRATEGIC OBJECTIVE | IMPLEMENTING AGENCIES |
|--|--|
| STRATEGIC OBJECTIVE 1 <i>(To Build Public Capacity to Condemn and Fight Corruption and to make Corruption a High-Risk, Low-gain Activity)</i> | CHRAJ, PEF, CSOS, GACC, MEDIA COMMISSION, NETWORK OF HUMAN RIGHTS NGOs, NCCE, MMDA, AS, IAA, EOCO, C&AGD |
| STRATEGIC OBJECTIVE 2 <i>(To Institutionalize Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors)</i> | MDA, PEF, PSC, OGC, CHRAJ, AS, C&AGD, MLGRD, IAA, PARLIAMENT, EC, LEA, CSOS, POL. PARTIES, AuG, APNAC, OHCS, OOP, MMDAs, MIN. EMPLOYMENT, BOARDS OF STATE INSTITUTIONS, GES, MOE, NVTI, PEF, WAEC, EDUCATIONAL INSTITUTIONS. |
| STRATEGIC OBJECTIVE 3 <i>(To Engage Individuals, Media and Civil Society Organizations in Reporting and Combating Corruption)</i> | EOCO, CHRAJ, POLICE, NACOB, BNI, GRA, CEPS, AG, PARLIAMENT, STATISTICAL SERVICE, NDPC, GACC, OHCS, MDAs, PEF |
| STRATEGIC OBJECTIVE 4 <i>(To Conduct Effective Investigations & Prosecutions of Corrupt Conduct)</i> | IFA, AS, CSOs, ACAs, AuG, PPA, EOCO, CHRAJ, ETCs, POLICE, BNI, FIC, A-G, MOF, JS, OOP, GRA (Customs Division), JUSAG, BOG, GACC, OHCS, MDAs, PEF. |

2.6. Structure of the Report

The maiden Annual Progress Report is presented in five sections. The first section is the introduction and background to NACAP, its scope and objectives. The second section covers the institutional arrangements for implementation, and the annual work plan. Section three deals with the implementation of the 2015 Work Plan. This section assesses the extent to which the various activities under the NACAP Strategic Objectives were carried out. Section four presents the challenges encountered during the implementation of the activities. The final section (five) covers the conclusions and recommendations.

SECTION THREE

3.0. IMPLEMENTATION OF 2015 NACAP WORK PLAN

3.1. Preparatory Activities

A number of preparatory activities were carried out to provide the requisite foundation for the commencement of the implementation of the 2015 Work Plan. A directive was issued by His Excellency the President of the Republic of Ghana to MDAs/ MMDAs to, among others, incorporate and mainstream activities of NACAP into their Medium Term Development Plans for implementation.

Other preparatory activities included the development of a monitoring and evaluation plan and tool by MONICOM, formation and inauguration of the National Ethics Advisory Committee (NEAC) under NACAP. Also six regional dialogue meetings, involving 780 public officers and about 180 media personnel, were organized to sensitize them on NACAP and the activities planned for 2015.

3.2. Institutional Participation

By the end of the reporting period, nineteen (19) out of the forty three (43) targeted implementing agencies had submitted their reports. (see Appendix 1).

Twelve (12) implementing agencies were to report on strategic objective 1, twenty-seven (27) on objective 2, Fifteen (15) on objective 3 and twenty-three (23) on objective 4.

At the end of the period, four (4) of the 12 implementing institutions reported on strategic objective 1. Ten (10) out of 27 reported on Strategic objective 2, seven (7) of 15 reported on strategic objective 3, whilst ten (10) out of 23 institutions reported on objective 4. (see Table 3)

Table 3: Planned & Reporting Implementing Institutions by Strategic Objectives

| S/Objective | Planned Implementers | No. Implementing |
|-------------|----------------------|------------------|
| 1 | 12 | 4 |
| 2 | 27 | 10 |
| 3 | 15 | 7 |
| 4 | 23 | 10 |

3.3. Activities Carried Out Under Strategic Objective 1

The main activities carried out under Strategic Objective 1: ***Build Public Capacity to Condemn and Fight Corruption and to make Corruption a High-Risk, Low-gain Activity***, were sensitization workshops, seminars, and dissemination of anti-corruption materials, organized mainly by CHRAJ and its collaborating agencies.

A total of 180 media practitioners and 780 public officers from RCCs and MMDAs benefited from the sensitization workshops while 1705 Males, 1174 Females, and 531 PWDs benefited from the GACC, GII, and SEND Ghana, USAID funded, sensitization workshops.

Also CHRAJ, in collaboration with EOCO, IAA, CAGD and Audit Service organized 761 public education programmes on corruption and Whistleblower Act at the District levels.

In addition, CHRAJ organized 20 public education programmes in the regions to educate general public, MDAS and CSOs focusing mainly on the linkage between corruption and fundamental human rights and freedoms.

Finally, GACC distributed 7,451 materials on anti-corruption to the public through various media and fora.

All these activities were intended to raise the target groups' awareness and knowledge of the consequences of corruption and thereby enabling them to resist corruption.

The above results, notwithstanding, it should be noted that a significant number of districts were not covered. Hence there is the need to increase the number of public education and sensitization programmes to cover staff of the remaining districts in order to enable them implement the NACAP.

3.4. Activities Carried Out Under Strategic Objective 2

Twenty-six activities were identified to be carried out in 2015 under Strategic Objective 2 ie. contribute to the ***Institutionalization of Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors***.

Eighteen (18) out of the twenty-six (26) activities under Strategic Objective (2) have been implemented with varying degrees of successes. Also only nineteen (19) of the forty-three (43) agencies completed the data collection tool on the activities relating to Strategic Objective 2, thus indicating a very low response rate.

One of the key activities under this objective was to identify public and private sector institutions that have developed customer service charters, and to assist in developing a generic customer service charter for adaptation by the aforementioned institutions. The GHS reported on the development of a customer service charter while CHRAJ and PSRS have initiated processes to develop a generic customer service charter for adaptation by other agencies to suit their needs.

In terms of the activity to issue circulars to remind MDAs and MMDAs to prepare financial statements on time for audit at the end of the year, only the OHCS and GHS complied.

The establishment of ARICs was another activity under this objective. The reports received from the agencies involved, indicated that 322 ARICs had been established out of the expected total figure of 394. This represents an achievement of 81.7%, which is quite commendable.

Subsequently, training was organized as part of the planned activities for members of the ARICs from five (5) agencies, namely, PURC, Energy Commission, Korle Bu Teaching Hospital, Ghana Prisons Service and the Ghana Health Service.

During the reporting period CHRAJ collaborated with Parliament of Ghana through the Constitutional, Legal and Parliamentary Affairs Committee to propose amendments on the Conduct of Public Officers' Bill, 2013. The Bill is currently at the consideration stage.

The draft Code of Conduct on ethics for MPs has also been prepared and laid before Parliament for consideration. It is expected to be promulgated in early 2016 and made operational.

The NEAC has been established, inaugurated and members trained. Thus, the framework for fighting corruption using the NEAC has been put in place. Another key activity was the review of the Assets Declaration Law, which is ongoing.

The re-printing, launching and distribution of guidelines of conflict of interest of CHRAJ were being considered. In the meantime, soft copies have been made and distributed to participants at various training programmes organized and fora by CHRAJ.

In order to promote openness, competitiveness and transparency in the processes of recruitment of CEOs, out of the 23 appointments during the reporting period, PSC advertised 10 vacancies to be filled, both internally and externally, seven (7) recommended from the Office of the President and six (6) in acting positions were recommended for confirmation. Twenty-seven (27) promotion interviews were also conducted, based on merit. Similarly, vacant positions for chief directors were advertised in both the media and the website of the OHCS.

One other activity was to audit the accounts of schools and institutions annually as required by law. This was said to be ongoing, though there was no readily available data on the number of schools and institutions audited so far.

On the installation of CCTV cameras at locations where the preparation and packaging of examination papers take place, there was no report on the status of implementation of this activity.

This is an important activity in view of the recent wide leakages of papers of the Basic Education Certificate Examination (BECE). There is the need to ascertain the status of implementation of this activity from the West African Examination Council.

In conclusion, more efforts should be made to increase the number of agencies involved in the activities under this Strategic Objective as well as strengthen the data collection strategies.

3.5. Activities Carried Out Under Strategic Objective 3

Twelve activities were planned under this Strategic Objective: ***To Engage Individuals, Media and Civil Society Organizations in Reporting and Combating Corruption.***

They include development of guidelines on receiving and processing of whistleblower disclosures under the Whistleblower Act and clearing of the backlog of internal audit recommendations not implemented. The 12 activities have been organized under six (6) topics as reported below.

3.5.1. Guidelines on Whistleblower Act

The development of safe reporting mechanisms for the public under the Whistleblower Act is key to the effective implementation of the Act. CHRAJ has developed guidelines on receiving and processing of disclosure under the Act. EOCO is in the process of developing similar guidelines. No reports were received from other MDAs and MMDAs on what they had done so far under this activity.

3.5.2. Provision of Complaints Box

Each implementing agency was to provide and place at least 2 complaint boxes at vantage points in the agency. The OoP has taken the lead to provide suggestion boxes for staff complaints. Other reporting agencies indicated they were in the process of setting up complaint boxes.

3.5.3. Reporting Misconduct

CHRAJ organized educational programmes on the NACAP and Code of Conduct for 115 regional and district directors, as well as HQ investigators of CHRAJ. In addition, CHRAJ, in conjunction with the PSC, organized a three-day training programme on ethics and integrity for public officers from 35 institutions.

3.5.4. The Right to Information Bill

The Right to Information Bill, is currently at the consideration stage in Parliament.

3.5.5. Monitoring and Evaluation Data Collection Tool

MONICOM developed and deployed a monitoring and evaluation tool to MDAs and MMDAs for use in collecting data/ information on the implementation of the activities of NACAP.

3.5.6. Internal Audit Backlog

The Internal Audit Agency has received 425 out of an expected 788 quarterly audit reports for monitoring. Defaulting MDAs and MMDAs have been written to submit their audit reports otherwise appropriate actions would be taken against them.

In conclusion, it must be noted that not much progress has been made in implementation of the activities planned under Strategic Objective 3. More effort therefore needs to be put in to get all MDAs and MMDAs to meet their commitments under NACAP.

3.6. Activities Implemented Under Strategic Objective 4

Nineteen activities were planned under Strategic Objective 4, ***To Conduct Effective Investigations and Prosecution of Corrupt Conduct***. These revolved around ratification of the international conventions on corruption, money laundering and transnational organized crime, sanctioning of persons who violate the public financial management laws, provision of training and capacity building.

3.6.1. Ratification of International Conventions

The United Nations Conventions against Transnational Organized Crime (Palermo Convention), 2012, was ratified by Ghana in 2014 prior to the adoption of NACAP. A draft Bill on corruption, money laundering and transnational organized crime has been prepared and currently being processed to become law.

3.6.2. Enforcement of Sanctions

The prompt sanctioning of persons who violate the public financial management laws is a key activity under NACAP. Only one agency, EOCO, indicated that it had sanctioned and/or prosecuted persons who had violated the public financial management laws though the number of persons involved in the breaches has not been indicated. In addition, it had developed timelines for the prosecution of cases.

3.6.3. Training and Development/Capacity Building

A few agencies implemented this activity. CHRAJ and EOCO reported of organizing training, locally and internationally, for their investigators. The Judicial Service trained 487 staff in ICT during the reporting period. PPA also organized eight (8) training sessions on public procurement for 500 public officers.

3.6.4. Information Sharing Amongst ACAs

Information sharing amongst anti-corruption and security agencies such as EOCO, FIC, GRA, NACOB, BNI, Police and CHRAJ is critical for effective implementation of NACAP. In furtherance of strengthening information sharing during the reporting period, CHRAJ organized two information sharing meetings to bring together the aforementioned agencies.

3.6.5. Use of ICT to reduce Opportunities for Corruption

The Judicial Service reported on its computerized system of assigning cases to judges. The system has been extended to cover all courts, both superior and lower courts, throughout the country in order to minimize, if not eliminate tendencies of Lawyers to request that their clients' cases be assigned to specific Judges who they (Lawyers) perceive would influence the outcomes in their clients' favour.

3.6.6. Investigations, Prosecution and Assets Recovery

As a general role for ACAs, the CHRAJ, BNI, EOCO, A-G's Office and the Police made modest progress in investigations, prosecutions and recovery of ill-gotten wealth. The CHRAJ received fifty-one (51) corruption and related cases including five (5) whistleblower disclosures. Of the 51 cases, twenty-three (23), were self-initiated based either on intelligence or reports from the media, while 28 were complaints received from the public. The details are as follows:

Table 4: Cases processed at CHRAJ

| S/N0. | Nature of Case | Received /Initiated | Concluded | Pending |
|---------------|-----------------------------|---------------------|-----------|-----------|
| 1. | Abuse Of Office/Power | 9 | 4 | 5 |
| 2. | Extortion | 9 | 9 | 0 |
| 3. | Corruption/Misappropriation | 27 | 11 | 16 |
| 4. | Fraud | 3 | 1 | 2 |
| 5. | Embezzlement | 3 | 1 | 2 |
| TOTALS | | 51 | 26 | 25 |

The BNI continued investigations into allegations of corruption (padding of salaries or “ghost names”) in relation to the National Service Scheme. In the meantime, 33 officials including the former Executive Director and his Deputy were being prosecuted while preparation for the prosecution of about 130 were far advanced. One hundred and sixty-three (163) personnel of the Scheme were also dismissed and over 18,589,734.74 million cedis recovered to the state.

Four cases were being investigated by the EOCO in the period. In addition, investigations into the GYEEDA allegations involving over 12 persons had concluded and were pending prosecutions.

The EOCO, in collaboration with the A-Gs Department recovered an amount of GHC 20,449,368.44 in relation to the various modules from Asongtaba Cottage Industries, RLG Communications and Craft PRO Ltd under GYEEDA.

The A-G reported that some corruption cases involving six persons including The Republic vrs Alfred Agbesi Woyome case were ongoing. Other dockets were being finalised for prosecution. They include:

- The Republic vrs Ken Kwaku Boadi Asare;
- The Republic vrs William Akuffo and 1 other, and
- The Republic vrs Akpeena Assibit, Dr. Shaibu Gariba and 1 other.

The Ghana Prisons Service reported that 684 persons were convicted for corruption between January 2014 and November 19, 2015. A further 748 were on remand. Of the 684 convicts, 44 were public officers (See Table 5 below)

Table 5: Persons convicted/remanded for Corruption (Jan 2014-Nov. 19, 2015)

| No | Offence | Convicts | Remand | Public Officers out of Convicts |
|----|---------------------------------------|------------|------------|---------------------------------|
| 1. | Fraud | 198 | 190 | 11 |
| 2. | Defrauding | 471 | 555 | 24 |
| 3. | Bribery | 1 | 2 | 0 |
| 4. | Laundering in Proceeds of Crime | 2 | 1 | 0 |
| 5. | Extortion | 3 | 0 | 0 |
| 6. | Corruption of Public Officer | 8 | 0 | 8 |
| 7. | Forgery of Judicial/Official Document | 1 | 0 | 1 |
| | TOTALS | 684 | 748 | 44 |

3.7. Overall Assessment of Performance

NACAP emphasizes the participation of every stakeholder in its implementation, especially public sector institutions. In spite of the President's Directive on the participation of all MDAs and MMDAs in the implementation of NACAP and other preparatory work prior to commencement of implementation, actual participation in the processes has been very low. Of the 43 institutions that were given the reporting tool and trained on how to use it, only 19, representing 44.2%, reported (see Appendix 1).

The participation of the private sector and civil society organisations have not been as encouraging as expected. Apart from the GACC which reported on activities it undertook in collaboration with GII, PEF, no other CSO or private sector organisation submitted reports.

SECTION FOUR

4.0. CHALLENGES

4.1. Institutional

The participation of MDAs and MMDAs in the implementation of NACAP has been low. Only 19 out of the 43 institutions that were given the reporting tool and trained on how to use it, reported on the usage of the reporting tool during the first reporting period.

There is lack of adequate knowledge about NACAP, institutional responsibilities, sense of ownership, and commitment on the part of some heads of MDAs and MMDAs.

Institutional representatives at HiLIC meetings, in some cases, lacked authority to implement decisions taken by HiLIC on return to their organizations. There have been changes of institutional representatives to MONICOM and HiLIC meetings by some institutions, resulting in loss of institutional memory on decisions taken relating to NACAP activities in those institutions.

4.2. Data Collection

MDAs and MMDAs had limited capacity, knowledge and understanding of how to report on the indicators using the monitoring and evaluation tool.

There is lack of baseline data on the high-level key performance indicators for NACAP to provide the basis for determining performance indicators at the institutional level.

4.3. Financial

Inadequate budgetary or lack of provision in the 2015 estimates for NACAP at the level of the MDA or MMDA meant that many of the activities planned could not be undertaken. CHRAJ in particular was heavily underfunded, although it had specifically budgeted for its extensive role in the implementation of NACAP. This, to a large extent, undermined its capacity to achieve set targets, including a baseline study on the state of corruption at the commencement of implementation of NACAP.

5.0. CONCLUSIONS

The progress made in the first year of implementation of NACAP indicates that the country is ready and willing to confront corruption together. Despite that preparatory work continued into the mid year, a good number of implementing agencies were able to implement a significant number of programmes assigned to them under NACAP.

Public awareness and education programmes targeted at enhancing the capacity of the public to resist and report corruption were undertaken. The general public benefitted including men, women, youth and persons with disability.

Additionally, measures were initiated on the enforcement political party law and to depoliticise corruption and crime, which are critical components of dealing with corruption in the country.

Most importantly, law enforcement and anti-corruption agencies have made significant progress on how to coordinate their activities, share information more regularly and undertake joint investigations where necessary.

6.0. RECOMMENDATIONS

Government should adequately resource CHRAJ to enable the latter develop the capacities of the MDAs and MMDAs. Institutions should get more understanding of their roles, the completion of the reporting tool, and what possible measures or actions they could undertake to implement NACAP.

The capacities of NISU and MONICOM should be strengthened to be able to respond effectively to challenges faced by organizational representatives, with a follow-up regime.

MONICOM should review the Monitoring and Evaluation Tool with the aim of simplifying it to enhance understanding and operationalizing it to capture the key performance indicators on the hierarchy of the monitoring and evaluation results chain, namely, outputs, outcomes and impacts, under each of the four strategic objectives of NACAP at the individual institutional level.

Heads of Institutions should redouble their efforts at making the Monitoring and Evaluation function in each implementing institution more effective to enable the institution achieve NACAP's objectives.

An effective communication strategy should be developed to serve as the mechanism for sensitising the general public on the activities of NACAP and dissemination of the achievements and lessons learnt.

Every effort should be made to ensure that the baseline survey is conducted as soon as practicable to set bench marks against which future achievements on NACAP can be evaluated.

In order to enhance compliance with the President's directive on NACAP implementation, the Office of the Chief of Staff should write to all the heads of agencies that did not comply with the directive to explain why disciplinary action should not be taken against them.

APPENDICES

Appendix 1: Institutions which Submitted Reports as of 20th October, 2015

| S/N | Implementing Partner | Submitted | Not Submitted |
|-----|--|-----------|---------------|
| 1. | Office of the President | | |
| 2. | CHRAJ | | |
| 3. | Private Enterprise Federation | | |
| 4. | Economic and Organised Crime Office | | |
| 5. | Office of the Head of Civil Service | | |
| 6. | Ghana Police Service | | |
| 7. | Judicial Service | | |
| 8. | National Development Planning Commission | | |
| 9. | Audit Service | | |
| 10. | Ghana Anti-corruption Coalition | | |
| 11. | Attorney General's Department | | |
| 12. | Public Service Commission | | |
| 13. | Internal Audit Agency | | |
| 14. | Ghana Health Service | | |
| 15. | NACOB | | |
| 16. | Ghana Education Service | | |
| 17. | CAGD | | |
| 18. | M LGRD | | |
| 19. | Parliament of Ghana | | |
| 20. | Public Procurement Authority | | |
| 21. | Electoral Commission | | |
| 22. | National Security, Ghana Armed Forces, Bureau of National Investigations | | |
| 23. | Ghana Statistical Service | | |
| 24. | State Enterprises Commission | | |
| 25. | The Media Commission/ GJA | | |

| S/N | Implementing Partner | Submitted | Not Submitted |
|-----|--|-----------|---------------|
| 26. | NCCE | | |
| 27. | WAEC | | |
| 28. | Ghana Revenue Authority | | |
| 29. | Ministry of Emploment | | |
| 30. | Ministry of Finance | | |
| 31. | Public Sector Reform Secretariat | | |
| 32. | All Political Parties | | |
| 33. | Financial Intelligence Centre (Bank of Ghana) | | |
| 34. | Chieftaincy Affairs and Cilture | | |
| 35. | Religious Bodies | | |
| 36. | Legal Aid Scheme/ Board | | |
| 37. | MOF | | |
| 38. | University of Ghana | | |
| 39. | Vice-Chancellors, Principals and Heads of Higher Institutions | | |
| 40. | National Vocational Training Institute | | |
| 41. | Fair wages Commission | | |
| 42. | Musicians Association of Ghana/ National Film and Television Institute | | |
| 43. | National Accreditation Board | | |
| 44. | Regional Coordinating Councils | | |
| 45. | Extractive Industries Transparency Initiative | | |
| 46. | Min. of Enegy | | |
| 47. | Min. of Foreign Affairs | | |
| 48. | National Health Insurance Scheme | | |
| 49. | Public Record and Archive Department | | |

Appendix 2: Status Of Implementation by Strategic Objectives:

| STRATEGIC OBJECTIVE 1: | | | | | |
|--|---|---|---------------------|-----------------------------|--|
| To Build Public Capacity to Condemn and Fight Corruption and to make Corruption a High-Risk, Low-Gain Activity | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
| | | | Lead | Collaborating | |
| 1 | Organize five (5) seminars and workshops on anti-corruption annually. | Number of seminars and workshops on anti-corruption organized annually. | CHRAJ | PEF, CSOs, GII, GACC | <p>CHRAJ: In collaboration with Oop, CHRAJ organized regional dialogues on NACAP for RCCs, Heads of Department, and MMDCs in six (6) Regions: 30 media practitioners & 780 officers from MMDAs</p> <p>GACC & PEF briefed all members of PEF on NACAP</p> <p>NACOB: 23 officers trained.</p> |
| 2 | Organize one hundred (100) sensitization programs on evils and ethos of corruption for the public through the media annually. | Number of media sensitizations programmes organized annually. | CHRAJ | PEF, CSOs, Media Commission | <p>CHRAJ has organized 46 seminars and workshops on corruption.</p> <p>GACC, GII & SEND with support from USAID, organised 50 District level sensitisation programmes in all the 10 regions for 1,705 participants; 1,174 males; 531 females and 74 of the participants were PWD</p> |

| STRATEGIC OBJECTIVE 1: (Cont'd) | | | | | |
|--|---|--|---------------------------------------|---|---|
| To Build Public Capacity to Condemn and Fight Corruption and to make Corruption a High-Risk, Low-Gain Activity | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
| | | | Lead | Collaborating | |
| 3 | Disseminate anti-corruption materials (leaflets, brochures, etc.) | Anti-corruption materials disseminated | CHRAJ | PEF, CSOs | <p>CHRAJ disseminated a total of 7, 451 materials on anti-corruption as follows:</p> <p>ABC on corruption</p> <p>Brochures on NACAP</p> <p>Brochures on the National Ethics Advisory Committee</p> <p>Conflict of Interest Guidelines</p> <p>Generic Code of Conduct for Public Officers</p> <p>President's Directives on the implementation of NACAP</p> <p>NACAP Document</p> |
| 4 | Organize at least two (2) public education programmes in each region to educate the general public, MIDAs, and CSOs, focusing mainly on the linkage between corruption and fundamental human rights and | Number of public education programmes organized. | CHRAJ | Network of Human Rights NGOs, other GACC Members, NCCE. | CHRAJ organised 2 Public Education programmes in each region. Thus, a total of 20 activities were organised. |
| 5 | Organize programmes at the districts on corruption and the whistleblower Act. | Programmes organized at the districts. | CHRAJ, EOCO, IAA, CAGD, Audit Service | NCCE, RCC, MMDAs, AUG, IAA | CHRAJ conducted 2 workshops for selected staff nationwide on the whistleblower Act. CHRAJ organised 761 Public Education Programmes on Corruption & whistleblower Act at the district level |

STRATEGIC OBJECTIVE 2

To Institutionalize Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors

| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
|-----|---|---|---------------------|-----------------------------------|---|
| | | | Lead | Collaborating | |
| 1 | Identify MDAs, Public and Private Sector Institutions without Customer service Charters. | Number of MDAs, Public and Private Sector Institutions without Customer Service Charters Identified. | PEF | MDAs, Private Sector Institutions | PSRC: The process has been initiated to engage a consultant to identify MDAs and other public sector institutions without Client Service Charters. The contract is expected to be awarded before the end of 2015. |
| 2 | Develop a generic customer service charter for adaptation by the MDAs, Public and Private sector institutions without charters. | A generic customer service charter developed for adaptation by the MDAs, Public and Private Sector institutions without charters. | PEF | MDAs, Private Sector Institutions | GHS: The GHS has developed a Customer Care Manual and an accompanying video clip with financial and technical support from ECOBANK, which is being used to promote client care in the service. The service continues to roll out educational programs on the patients charters to its clients. Moreover, GHS disseminated its Code of Conduct and Disciplinary Procedures to Staff of the Service. PSRS: A consultant has been engaged to conduct a survey to obtain the necessary data and information for the development of the prototype Client Service Charter. The consultant is expected to complete his work by the end of December, 2015. |
| 3 | Assist MDAs, Public and Private sector Institutions to develop Customer Service Charters. | Number of MDAs, Public and Private Sector institutions assisted to develop Client Service Charters. | CHRAJ | MDAs, Private Sector Institutions | CHRAJ: Consultant engaged to undertake a survey on the state of implementation of Clients Service Charter in the MDAs. GHS: The GHS Customer Care Manual is being adapted by private health facilities that collaborate with the service |

STRATEGIC OBJECTIVE 2: (Cont'd)

To Institutionalize Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors

| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
|-----|--|--|---------------------|-------------------------------|--|
| | | | Lead | Collaborating | |
| 4 | Issue circulars at the end of each financial year, reminding MDAs and MMDAs to prepare financial statements on time for audit. | Circulars issued at the end of each financial year. | PSC, OHCS | All MDAs, Public Institutions | Circulars issued |
| 5 | Sanction Heads of MDAs and MMDAs for not preparing financial Statements on time for audit. | Number of Heads of MDAs and MMDAs sanctioned for not preparing financial statements on time for audit. | CAGD, Audit Service | PSC, OHSC | NIL |
| 6 | Identify MDAs and MMDAs with Audit Report Implementation Committees (ARICs). | Number of MDAs and MMDAs with ARICs identified. | IAA | All MDAs, Public Institutions | 322 ARICs established as at December, 2015 |
| 7 | Establish ARICs in MDAs and MMDAs without ARICs | Number of MDAs and MMDAs without ARICs established | MLGRD, CAGD | IAA, Parliament | IAA: A total of 64 made up of 16 MDAs & 48 MMDAs are without ARICs. Steps are being taken to have these institutions establish ARICs. |
| 8 | Train at least fifteen (15) ARICs of MDAs and MMDAs annually. | Number of ARICs of MDAs and MMDAs trained annually. | IAA, MLGRD | All MDAs, MMDAs, Parliament | IAA: ARICs of PURC, Energy Commission, Korle Bu Teaching Hospital and Ghana Prisons Service have been trained. |
| | | | | | GHS: The Director of Internal Audit Division of the Service facilitated the requisite orientation for ARIC members. |

STRATEGIC OBJECTIVE 2 (Cont'd)

| To Institutionalize Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors | | | | | | |
|---|---|---|-----------------------------|-----------------------------------|--|--|
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation | |
| | | | Lead | Collaborating | | |
| 9 | Submit report of relevant Committee of Parliament on the Conduct for Public Officers' Bill to Parliament for its consideration and passage. | Law enacted on Public Officers. | Auditor General; Parliament | CHRAJ | CHRAJ: Engaged the Constitutional, Legal and Parliamentary Affairs on the Code of Conduct for Public Officers' Bill, 2013. Report Submitted to Parliament and Bill was at Consideration Stage. | |
| 10 | Develop a Code of Conduct or Ethics for MPs. | Code of Conduct / Ethics developed. | Parliament | CHRAJ, AG, Auditor General, APNAC | The Code of Conduct for MPs has been developed and the draft document is under consideration by sub-committee of parliament. | |
| 11 | Publish the Code of Conduct or Ethics for MPs. | Code of Conduct / Ethics published. | Parliament | CHRAJ, AG, Auditor General, APNAC | NIL | |
| 12 | Enforce compliance with the Code of Conduct / Ethics for MPs. | Number of MPs introduced to Code of Conduct / Ethics. | Parliament | CHRAJ, AG, Auditor General, APNAC | NIL | |
| 13 | Enforce compliance with the Code of Conduct / Ethics for MPs. | Codes of Conduct / Ethics being enforced. | Parliament | CHRAJ, AG, Auditor General, APNAC | NIL | |

| STRATEGIC OBJECTIVE 2 (Cont'd) | | | | | | |
|---|---|--|---------------------|--|--|--|
| To Institutionalize Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors | | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation | |
| | | | Lead | Collaborating | | |
| 14 | Request relevant institutions for nominations to the National Ethics Advisory Committee established under the Code of Conduct for Public Officers of Ghana. | Number of institutions making nominations on National Ethics Advisory Committee. | CHRAJ | MDAs, PSC, OHSC, Office of the President | CHRAJ: Fourteen (14) institutions nominated representatives on the National Ethics Advisory Committee (NEAC) | |
| 15 | Provide training (orientation) for the members of the National Ethics Advisory Committee. | Number of training programs organized for NEAC. | CHRAJ | MDAs, PSC, OHSC, Office of the President | CHRAJ organized a one-day training and orientation for the National Ethics Advisory Committee. | |
| 16 | Inaugurate NEAC. | Number of institutions with integrity committees / ethics committees. | CHRAJ | PSC, MDAs | NEAC inaugurated on 20 th November, 2015. | |
| 17 | Provide training to members of NEAC of the 15 institutions. | Number of integrity committees trained | | | CHRAJ organized a one-day training on integrity for 45 members of the committee in Ada in August. | |
| 18 | Review the Asset Declaration Law. | Law Reviewed. | AG | AG, CHRAJ, CSOs | GRA: Ongoing | |

| STRATEGIC OBJECTIVE 2 (Cont'd) | | | | | | |
|---|--|---|---------------------|---|--|--|
| To Institutionalize Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors | | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation | |
| | | | Lead | Collaborating | | |
| 19 | Re-print copies of the Guidelines of Conflict of Interest launched in 2006 for distribution to public officers on conflict of interest. | Copies of Guidelines on Conflict of Interest printed. | CHRAJ | PSC, Heads of MDAs & MMMDAs | CHRAJ printed and distributed copies of conflict of interest guidelines at the various training programmes. | |
| 20 | Advertise vacant positions created in the state institutions in widely circulated print media and website for at least two weeks notice. | Adverts on vacant positions in state institutions published in the media. | OoP, PSC, OHSC | Ministry of Employment, Boards and Councils of State Institutions | PSC: 68 vacant positions for recruitment / appointment were filled and 27 promoted exercises were carried out. OHCS: Advertisement of Chief Directors in the media and the agency's website: www.ohcs.gov.gh | |
| 21 | Appoint CEOs of public service institutions through open, competitive and transparent processes. | Number of categories A & B holders appointed. | OoP, PSC, OHSC | Ministry of Employment, Boards and Councils of State Institutions | 23 appointments made, with 10 advertised both internally and externally. 7 were recommendations from the Office of the President. 6 were in Acting positions and were recommended for confirmation. | |
| 22 | Audit School / Institution accounts annually as required by law. | Number of schools and institutions accounts audited. | Auditor General | GES, MoE, IAA | Ongoing | |

STRATEGIC OBJECTIVE 2 (Cont'd)

To Institutionalize Efficiency, Accountability and Transparency in the Public, Private and Not-For-Profit Sectors

| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
|-----|---|---|---|---------------|---|
| | | | Lead | Collaborating | |
| 23 | Install CCTV cameras or devices at locations where the preparation and packaging of exam papers take place. | Number of locations CCTV cameras or devices installed. | WAEC Examination Entities, Educational Institutions | | NIL |
| 24 | Pursue persons and political parties that breach the laws regulating political operations without fear or favour. | Persons and parties that breach the laws regulating political operation pursued without fear or favour. | EC | | NIL: The Commission, however, is currently pursuing failing political parties on exercise conducted in 2014 on breaches of laws regulating political parties. E.g. Inspection of political party. |
| 25 | Meet political parties' representatives on the needs to enforce the legislation regulating the operations of the political parties. | Number of meetings with political parties representatives held. | EC | | EC organized four (4) IPAC, ten (10) RIPAC, and 230 DIPAC meetings. Meetings were largely successful with EC impressing upon political parties to abide by legislations regulating their operations. |
| 26 | Organize awareness creation programs / events on the need to enforce laws in general and the political parties law in particular. | Number of awareness creation programmes and events organized. | EC | | Total of sixty-one (61) awareness programmes and events organized: |
| | | | | | Media Encounter-1 |
| | | | | | CSOs-20 |
| | | | | | PWD / Women Org.-10 |
| | | | | | Visually Impaired-10 |
| | | | | | Media / CSOs-10 |
| | | | | | PWDs-10 |
| | | | | | A total of 315 Advertisement on TV Promotions, Documentary Drama, Radio Jingles. |

| STRATEGIC OBJECTIVE 3: | | | | | |
|---|--|---|--------------------------------------|--|---|
| To Engage Individuals, Media and Civil Society Organizations in Reporting and Combating Corruption. | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
| | | | Lead | Collaborating | |
| 1 | Develop guidelines on receiving and processing of whistleblower disclosures by June 2015. | Guidelines on receiving and processing complaints developed. | CHRAJ, Police, NACOB, BNI, GRA, EOCO | PSC, OHSC, MDAs, PEF, Private Sector Organizations | CHRAJ has developed guidelines for receiving and processing of whistleblower disclosures. EOCO has written submission to the Executive Director for the necessary action. Mechanisms are in place for receiving oral complaints. |
| 2 | Provide at least two Complaint Boxes at vantage points in institutions. | Number of Complaint Boxes provided at vantage points in institutions. | CHRAJ, Police, NACOB, BNI, GRA, EOCO | PSC, OHSC, MDAs, PEF, Private Sector Organizations | CHRAJ: NIL EOCO: NIL GRA: One suggestion Box is available at the Tema Collection Customs Division. Further GRA's website has a module to receive complaints from the general public. OoP provided suggestion/complaint boxes. |
| 3 | Educate and encourage staff and public to report misconduct for investigations by September. | Number of staff and public educated and encouraged to report misconduct for investigations. | CHRAJ, Police, NACOB, BNI, GRA, EOCO | PSC, OHSC, MDAs, PEF, Private Sector Organizations | CHRAJ: Organized three (3) educational programmes to encourage staff to report misconduct for investigation. In all, 115 staff participated. EOCO: Several durbars were held to encourage staff to report misconduct for investigation. The corporate website has also been made available to the general public to report misconduct for investigations. GRA: Organized 20 radio public information campaign on customs integrity initiative, including corruption reporting mechanisms. Also organized training workshops for Officers on ethics and integrity. |
| | | | | | NDPC: NIL |

| STRATEGIC OBJECTIVE 3: (Cont'd) | | | | | |
|---|--|---|----------------------|----------------------------------|---|
| To Engage Individuals, Media and Civil Society Organizations in Reporting and Combating Corruption. | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
| | | | Lead | Collaborating | |
| 4 | Consideration by relevant Committee Report on Right to Information Bill by the end of October. | Report of the relevant Committee on the Right to Information Bill considered. | AG, Parliament | CHRAJ, Statistical Service, NDPC | PARLIAMENT: Bill at Consideration Stage in Parliament. |
| 5 | Debate and pass Right to Information Draft Bill by end of November. | Bill Passed. | AG, Parliament, EOCO | CHRAJ, Statistical Service, NDPC | PARLIAMENT: Bill at Consideration Stage. |
| 6 | Develop MONICOM'S M&E Data Collection Tools by mid-July. | Data Collection Tools developed. | CHRAJ, EOCO | GII, Other Members of GACC | CHRAJ: M&E Data Collection Tool developed, validated and being used by implementing agencies. |
| | | | | | EOCO: M&E Data Collection Tool developed, validated and adopted by implementing agencies and stakeholders. |
| 7 | Collect data and compile M&E MONICOM report by end of November 2015. | Data collected and report compiled. | CHRAJ, EOCO | GII, Other Members of GACC | Data on M&E being received from implementing agencies. |
| 8 | Publish the MONICOM M&E Report by 7 th December for dissemination. | Report ready by 7 th Dec. for publication on International anti-corruption day on the 9 th Dec. | CHRAJ, EOCO | GII, Other Members of GACC | Report compiled for publication |

| STRATEGIC OBJECTIVE 3: (Cont'd) | | | | | | |
|---|---|---|---------------------|---------------|--|--|
| To Engage Individuals, Media and Civil Society Organizations in Reporting and Combating Corruption. | | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation | |
| | | | Lead | Collaborating | | |
| 9 | Identify and Compile internal audit backlogs by end of 2015. | Backlogs identified and compiled. | AG, IAA | PAC | GRA: All backlogs cleared. IAA: As at third quarter of 2015, the Agency had received a total of 425 quarterly reports from an expected number of 788 reports. | |
| 10 | Publish time table for clearing internal audit backlogs by end of April 2016. | Time table for clearing backlogs published. | AG, IAA | PAC | IAA: work in progress | |
| 11 | Assign Auditors to undertake audit and report within specified time frame by end of 2016. | Auditors assigned. | AG, IAA | PAC | IAA: work is in progress | |
| 12 | Conduct field visits to ascertain that backlogs have been cleared. | Backlogs cleared. | AG, IAA | PAC | IAA: field visits to the defaulting MDAs and MMMDAs were initiated in the fourth quarter. Report on the field visits to be issued by end of the year. | |

| STRATEGIC OBJECTIVE 4: | | | | | |
|--|--|---------------------------------------|---------------------|--------------------------------|--|
| To Conduct Effective Investigations and Prosecution of Corrupt Conduct | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
| | | | Lead | Collaborating | |
| 1 | Ratify and domesticate international conventions relating to Corruption, Money Laundering and Transnational Organized Crime. | Palermo Convention ratified | AG, Parliament | CHRAJ, EOCO, FIC | Palermo Convention ratified in 2014 |
| 2 | Finalise and submit bill on Corruption, Money Laundering and Transnational Organized Crime to Parliament. | Comments and memos on bill conducted. | AG, Parliament | Other Anti-Corruption Agencies | There were roundtable discussions on the draft witness Protection Bill and the Whistleblower Act. MOU on strategy for collection and coordination on information sharing is being developed by ACAs. |
| 3 | Refer breaches of Act 654, Act 663 and Act 658 to appropriate Agencies for investigations and prosecutions. | Laws and Regulations enforced. | IFA, Audit Service | CSOs, AG | NIL |

| STRATEGIC OBJECTIVE 4: (Cont'd) | | | | | |
|--|---|--|------------------------------|-------------------------------|--|
| To Conduct Effective Investigations and Prosecution of Corrupt Conduct | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
| | | | Lead | Collaborating | |
| 4 | Sanction persons who violate the Financial Regulations promptly. | Number of institutions complaint with Financial Regulations. | AG, PPA | CSOs, ETC, Entity Heads, EOCO | EOCO has sanctioned and prosecuted persons who have violated the Financial Regulations. |
| 5 | Organise Training of Trainers course for representatives of MDAs on Financial Management Laws and Regulations. | Number of Training of Trainers course for MDAs organized. | PPA, ETC, Entity Heads, EOCO | CSOs, AG | PPA organised 8 training sessions with 500 participants from various entities |
| 6 | Prepare comprehensive career development programme for prosecutors of the AG and investigators. | Career development programme prepared. | AG | Police, EOCO, BNI, FIC | EOCO organised several career comprehensive programmes / training for investigators, both locally and internationally. |
| 7 | Develop a training program on corruption investigation and prosecution as well as the code of conduct for prosecutors of the AG's Department. | Training programme developed. | AG | Police, EOCO, BNI, FIC | |

| STRATEGIC OBJECTIVE 4: (Cont'd) | | | | | |
|--|---|---|---------------------------------|---------------------------------------|---|
| To Conduct Effective Investigations and Prosecution of Corrupt Conduct | | | | | |
| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
| | | | Lead | Collaborating | |
| 8 | Strengthening supervision of prosecutors to improve prosecution of corruption cases. | Supervision strengthened. | AG | Police, EOCO, BNI, FIC | <p>EOCO: Effectively supervised prosecutors to improve prosecution of corruption cases.</p> <p>FIC: The U.S. Treasury Office of Technical Assistance organised training sessions for law enforcement agencies including staff of AG. This resulted in the recent money laundering convictions since 2014. Five have been reported so far.</p> |
| 9 | Incentivise and sanction prosecutors who delay cases without just cause as well as those who generally breach the Code of Conduct for Prosecutors of the AG's Department to facilitate speedy prosecution of corruption cases complementarily | Number of Prosecutors rewarded or sanctioned. | AG | Police, EOCO, BNI, FIC | EOCO has constantly demanded and received case reports, status and update from Prosecutors, and has given timelines and sanctioned Prosecutors who delayed without just cause. |
| 10 | Provide adequate and predictable funding for operations of Anti-Corruption Institutions. | Anti-Corruption Agencies funded on time. | MoF, OoP | CHRAJ, Police, EOCO, Judicial Service | NIL |
| 11 | Strengthen information sharing among Anti-Corruption Agencies. | Anti-Corruption Agencies sharing information. | Key Accountability Institutions | GRA-CEPS | <p>CHRAJ: Two meetings to strengthen information organised. MOU on Strategy for Collaboration and Coordination on information sharing being developed by ACAs.</p> <p>EOCO has been sharing information with ACAs such as the FIC, GRA, NACOB, Police, BNI, and CHRAJ.</p> |

STRATEGIC OBJECTIVE 4: (Cont'd)

To Conduct Effective Investigations and Prosecution of Corrupt Conduct

| S/N | Activity | Indicator | Implementing Agency | | Status of Implementation |
|-----|--|---|---------------------|---------------------|---|
| | | | Lead | Collaborating | |
| 12 | Extend the computerized system of appointing judges to sit on cases to judges in all regions where there are more than one justices of the High court. | Number of judges selected using computerized system. | Judicial service | JUSAG, MoF | Judicial Service: The computerization system of appointing Judges on cases has been extended to cover all Courts, both Superior and the lower Courts throughout the country. |
| 13 | Organize ICT Training in general for Judicial Service Staff. | Number of Judicial Service Staff Trained. | Judicial service | JUSAG | A total number of 487 staff were trained in ICT during the reporting period. |
| 14 | Train FIC on financial intelligence analysis. | Number of FIC staff trained. | FIC | Bank of Ghana, EOCO | FIC: All staff in the various functional units have undergone series of training locally. On the foreign front, about half of the staff also traveled abroad to abreast themselves with techniques in financial intelligence analysis. |
| 15 | Provide tools and equipment for Financial Intelligence Analysis. | Financial Intelligence Analysis tools and equipment provided. | Judicial service | JUSAG, MoF | FIC received tools and equipment from the Inter-Governmental Group against Money Laundering and Terrorist Financing in West Africa (GIABA). But the Tools and equipment are not functional |
| 16 | Prepare training modules on Financial Management Laws and Regulations. | Training modules prepared. | | | |



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