

# IMPLEMENTATION OF GHANA'S NATIONAL ANTI-CORRUPTION ACTION PLAN (NACAP) 2015-2024

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This Report is a product of the Commission on Human Rights and Administrative Justice (CHRAJ) and its partner institutions under the National Anti-Corruption Action Plan (NACAP) [High Level Implementation Committee (HiLIC) and Monitoring and Evaluation Committee (MONICOM)]. The Report has been compiled in line with the reporting obligations under NACAP.

The report shows that implementation of the NACAP continued to improve in 2019, albeit not at the rate expected. It also showed participation by all three main sectors of the Society (Public, Private and Civil Society).

I commend all the stakeholders who implemented activities under the NACAP and submitted reports to CHRAJ. Their efforts have contributed to the national effort to reduce corruption and laying a strong foundation for bringing corruption under control. I would also like to acknowledge the contribution of those who implemented activities under NACAP, but failed or could not submit reports through the NACAP Online Reporting Dashboard (NACORD).

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**Richard Quayson**  
Deputy Commissioner, CHRAJ, and Chair of MONICOM



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### III. ACRONYMS AND ABBREVIATIONS

<b>ACAs</b>	Anti-Corruption Agencies
<b>ACT</b>	Anti-Corruption and Transparency
<b>ADISS</b>	Accountable Democratic Institutions and Systems Strengthening
<b>AG</b>	Attorney-General
<b>AGA</b>	Annual General Assembly
<b>ALAC</b>	Advocacy and Legal Advice Centre
<b>AuG</b>	Auditor General
<b>APR</b>	Annual Progress Report
<b>ARAP</b>	Anti-Corruption, Rule of law and Accountability Programme
<b>AUCPCC</b>	African Union Convention on Preventing and Combating Corruption
<b>BoG</b>	Bank of Ghana
<b>CECs</b>	Civic Education Clubs
<b>CGs</b>	Citizen Groups
<b>CHRAJ</b>	Commission on Human Rights and Administrative Justice
<b>CRA</b>	Corruption Risk Assessment
<b>CSOs</b>	Civil Society Organizations
<b>CoSP</b>	Conference of State Parties
<b>DAs</b>	District Assemblies
<b>DSW</b>	Department of Social Welfare
<b>DVLA</b>	Driver and Vehicle Licensing Authority
<b>EOCO</b>	Economic and Organized Crime Office
<b>FBI</b>	Federal Bureau of Investigations, USA
<b>FIC</b>	Financial Intelligence Centre
<b>FOSDA</b>	Foundation for Security and Development in Africa
<b>GACC</b>	Ghana Anti-Corruption Coalition
<b>GBC</b>	Ghana Broadcasting Corporation
<b>GDI</b>	Government Defence Integrity Index
<b>GHEITI</b>	Ghana Extractive Industry Transparency Initiative
<b>GIABA</b>	Inter-Governmental Action Group against Money Laundering in West Africa
<b>GIFEC</b>	Ghana Investment Fund for Electronic Communications
<b>GIFMIS</b>	Ghana Integrated Financial Management Information System
<b>GII</b>	Ghana Integrity Initiative
<b>GPS</b>	Ghana Police Service
<b>HiLIC</b>	High Level Implementation Committee
<b>IAA</b>	Internal Audit Agency
<b>ICT</b>	Information Communication Technology
<b>IPs</b>	Implementing Partners
<b>IRG</b>	Implementation Review Group
<b>iTaPS</b>	Integrated Tax Application and Preparation Systems
<b>M&amp;E</b>	Monitoring and Evaluation
<b>MDAs</b>	Ministries Departments and Agencies
<b>MMDAs</b>	Metropolitan Municipal District Assemblies

<b>MMDCE</b>	Metropolitan Municipal District Chief Executives
<b>MoA</b>	Ministry of Aviation
<b>MoD</b>	Ministry of Defence
<b>MoE</b>	Ministry of Energy
<b>MoF</b>	Ministry of Finance
<b>MONICOM</b>	Monitoring Committee
<b>NACAP</b>	National Anti-Corruption Action Plan
<b>NACIWA</b>	Network of Anti-Corruption Institutions in West Africa
<b>NACoRD</b>	National Anti-Corruption Reporting Dashboard
<b>NALAG</b>	National Association of Local Authorities of Ghana
<b>NCCE</b>	National Commission for Civic Education
<b>NDPC</b>	National Development Planning Commission
<b>NGOs</b>	Non-Governmental Organisations
<b>NISU</b>	NACAP Implementation Support Unit
<b>NPRA</b>	National Pensions Regulatory Authority
<b>OAG</b>	Office of the Attorney General
<b>OEII</b>	Office of Ethics and Internal Investigation
<b>OHCS</b>	Office of the Head of the Civil Service
<b>OHLGS</b>	Office of the Head of Local Government Service
<b>OHCHR</b>	Office of the United Nations High Commissioner for Human Rights
<b>OoP</b>	Office of the President
<b>OPSI</b>	Other Public Sector Institutions
<b>PESU</b>	Professional and Ethics Unit
<b>PFM</b>	Public Financial Management
<b>PSC</b>	Public Service Commission
<b>PS</b>	Private Sector
<b>RCCs</b>	Regional Coordinating Councils
<b>RGD</b>	Registrar-General's Department
<b>RTI Bill</b>	Right To Information Bill
<b>SACs</b>	Social Accountability Clubs
<b>SDGs</b>	Sustainable Development Goals
<b>SEC</b>	State Enterprise Commission
<b>SSNIT</b>	Social Security and National Insurance Trust
<b>STAAC</b>	Strengthening Action Against Corruption
<b>UNCAC</b>	United Nations Convention Against Corruption
<b>UEW</b>	University of Education, Winneba
<b>UG</b>	University of Ghana
<b>UPS</b>	University of Professional Studies
<b>UNIACD</b>	United Nations International Anti-Corruption Day
<b>UNODC</b>	United Nation Office on Drugs and Crime
<b>VRA</b>	Volta River Authority
<b>WB</b>	Whistle-blowing

## **IV. EXECUTIVE SUMMARY**

### **Introduction and Background**

This is the fifth report on implementation of National Anti-Corruption Action Plan (NACAP) adopted in 2014 to address corruption in Ghana. The report has been compiled from information provided by a total of 91 Implementing Partners (IPs). Of these, 84 IPs used the newly introduced National Anti-Corruption Reporting Dashboard (NACoRD), an online tool whereas seven submitted hard copy reports.

Prior to the implementation of the 2019 NACAP Annual Work Plan (AWP), the Commission on Human Rights and Administrative Justice (CHRAJ), the coordinating institution, undertook a number of activities in order to address challenges associated with reporting by IPs in previous years. Challenges identified included low patronage and demonstration of commitment to implementation of NACAP; inability of some IPs to submit their reports through the NACoRD before the deadline for submission; and some IPs reporting on activities that did not pertain to their institution while others did not comprehend the information required from them.

Thus, preparatory activities to enhance reporting included disaggregating the roles for IPs by cluster, and disseminating the 2019 NACAP AWP via email and direct delivery to IPs, and training IPs on how to use the NACoRD for reporting on 2019 activities. CHRAJ also extended the deadline for reporting two times and also left the system open till July 17, 2020.

The report highlights progress of implementation of the activities prioritised for the period January 1 to December 31, 2019 and a performance analysis of progress over the 5 years of adoption and implementation of the NACAP (2015-2019). It also presents the challenges encountered as well as recommendations to address them.

The report is organised into six sections. In addition to the “Introduction and Background”, and “Preparatory Activities”, which form sections 1 and 2 respectively, “Implementation of 2019 AWP”, “Progress of Implementation” are presented in Sections 3 and 4, respectively. Section 5 deals with “Performance of NACAP from 2015-2019” whilst Section 6 presents the “Conclusions, Challenges, Recommendations and Outlook for 2020”.

### **Implementation of 2019 Annual Work Plan (AWP)**

The Annual Work Plan (AWP) for 2019 is made up of 84 Broad Activities, which are further divided into 132 Specific Activities, and 171 Indicators grouped under General Roles, and the four Strategic Objectives of the NACAP. The AWP is therefore composed as follows:

1. General Roles: Broad Activities 2, Specific Activities 9, and Indicators 14.
2. Strategic Objective 1: Broad Activities 22, Specific Activities 50, and Indicators 58.

3. Strategic Objective 2: Broad Activities 26, Specific Activities 43, and Indicators 47.
4. Strategic Objective 3: Broad Activities 14, Specific Activities 16, and Indicators 18.
5. Strategic Objective 4: Broad Activities 20, Specific Activities 34, and Indicators 34.

At the end of the reporting period, ninety one (91) institutions submitted reports indicating they undertook various measures to either prevent or address corruption. The number of Lead IPs reporting on Strategic Objective 1, 2, 3, and 4 were 11, 72, 11 and 13 respectively.

## 1. General Roles

Eighty five (85) IPs reported on General Roles. These include the Office of the President (OoP), Parliament of Ghana, 33 MDAs, 44 MMDAs, 6 Other Public Sector Institutions (OPSIs), 1 from Private Sector and 3 CSOs.

- a) Fifty five (54) out of 85 IPs that reported on implementation of General Roles indicated having budgeted specifically for implementation of NACAP.
- b) Sixty three (63) IPs reported they organised various sensitisation programmes on NACAP for their staff using varied means including staff durbars, management meetings, induction training, and capacity building workshops.
- c) IAA reported facilitating the establishment and inauguration of additional 61 Audit Committees, bringing the total number of committees to 444, presenting 85% of the expected. It also trained 305 audit committee members within public sector institutions. 56 IPs reported on their Audit Committee trainings.
- d) Out of the 85 IPs that reported on general roles, 63 reported that they had taken steps to establish safe reporting mechanisms at their workplaces.
- e) Twenty five (25) IPs reported having received 146 complaints relating to corruption and various forms of misconduct at the workplace. Of the 146 complaints, 59 were investigated resulting in various actions taken. 23 persons sanctioned, 10 refunded monies, 8 suspended, 7 declined refunds for a year, 7 cautioned, 3 appointments terminated and 1 person imprisoned.
- f) Thirty (30) IPs reported having developed and published sexual harassment policies to their staff through various methods including: staff durbar, corporate websites/intra-nets, circulation of handbooks and Service Regulations/Human Resource Manuals.
- g) Thirty two (32) IPs reported taking pragmatic measures to prevent abuse or misuse of official time including lateness, absenteeism and moonlighting by installing electronic swipes/clock-in devices, employee absence reporting systems, Closed Circuit Television (CCTV) cameras, and analysing monthly salary validation reports generated from electronic swipes.

## 2. Strategic Objective 1

Sixty seven (67) IPs reported on Strategic Objective 1 made up of the OoP, Parliament of Ghana, 25 MDAs, 30 MMDAs, 4 CSOs, 5 OPSIs, and 1 Private Sector.

- a) NCCE and CHRAJ reported having organised 15,152 public education programmes for MDAs, MMDAs, CSOs and the general public across the country. Whilst 14 other IPs reported organising 15,280 public education and awareness programmes. Three CSOs (GACC, GII and Alliance for Integrity) organised anti-corruption related outreach programmes in collaboration with governmental and private sector organisations.

The FIC reported conducting anti-corruption related trainings, orientations and sensitization workshops in collaboration with governance institutions, private sector, CSOs and FBOs for over 2,080 beneficiaries.

- b) Nine (9) IPs developed anti-corruption, ethics and integrity related programmes as part of their organizational culture. CHRAJ collaborated with 10 institutions to develop ethics and integrity tools for adoption and use by Public Sector institutions. Two MDAs revealed that integrity issues were embedded in the Civil Service Code of Conduct for their adaption.
- c) Eleven (11) IPs undertook measures towards developing and disseminating anti-corruption related materials to public schools, universities members of the general public. GACC and EOCO reported disseminating anti-corruption materials to some selected SHS, JHS and primary schools in three regions.  
CHRAJ developed and printed 500 copies of Fact Sheets on NACAP, and reprinted 500 copies each of leaflets for sensitization on NACAP and the “ABC of Corruption” for dissemination to the general public.  
EOCO, CHRAJ, BoG and FIC raised awareness on money laundering and financing of terrorism. EOCO trained selected journalists from two Media establishments, whilst FIC trained, conducted orientations and sensitised Accountable Institutions from governance institutions, private sector, CSOs and FBOs.
- d) MoF collaborated with AG, IAA and Parliament on passage of the Public Financial Management Regulations, 2019, (L.I. 2378) to guide the implementation of the PFM Act, 2016 (Act 921).
- e) Seven (7) IPs reported initiating various processes towards establishing Integrity Awards in the public and private sectors, including civil society. GII, in collaboration with GACC and CHRAJ, held the maiden Ghana Integrity Awards.

### 3. Strategic Objective 2

Seventy eight (78) IPs submitted reports on implementation of Strategic Objective 2.

- a) MoF reported rolling out trainings to all the 67 Domestic Tax Revenue Division offices on the Total Revenue Integrated Processing and also organised 19 sensitisation programmes on the Integrated Tax Application and Preparation Systems (iTAPs) for 2,114 staff members and stakeholders.
- b) Eleven (11) IPs undertook measures to develop a framework for public officers to disclose personal interest upon taking up public appointments. The PSC reported that all 429 category “A” and “B” Office holders appointed/promoted in the reporting year were given copies of the Assets Declaration forms to fill for onward submission to the Auditor General.

NCCE, GACC and GII reported engaging the citizenry in civic awareness to enable the public to demand accountability from public officials.

- c) Parliament of Ghana has initiated process for enactment of a law on Budget.

#### **4. Strategic Objective 3**

Twenty two (22) IPs reported on strategic objective 3.

- a) NCCE, CHRAJ and GII reported having organised radio discussions on whistle blowing across the country. In addition, CHRAJ used GBC's Breakfast Show to sensitize the public on corruption issues generally during the Anti-Corruption and ACT week celebrations organised in December.
- b) Parliament enacted the Right to Information Act, 2019 (Act 989) in the reporting year.

#### **5. Strategic Objective 4**

Sixty two (62) IPs submitted reports on the activities implemented under Strategic Objective 4. In relation to implementation of the United Nations Convention against Corruption (UNCAC) and other international instruments on corruption:

- a) Ghana was reviewed under the second cycle UNCAC Review Mechanism in the area of prevention and asset recovery.
- b) Ghana also reviewed Algeria and Indonesia during the reporting period.
- c) Ghana participated in IRG meetings and Conference of State Parties.
- d) Ghana participated in two international cooperation meetings on Anti-money Laundering, Illicit Financing and Countering the Financing of terrorism.

#### **6. Progress Made**

Ghana, since adoption and implementation (2015-2019) of the NACAP has made modest strides and significant contribution towards implementation and the realisation of the objectives of the UNCAC and the African Union Convention on Preventing and Combating Corruption (AUCPCC). Among others:

- NACAP implementation continues to improve, with 124 broad activities (out of 135) at various stages of implementation.
- Awareness of the evils of corruption and the mechanisms for reporting corruption, including whistleblowing, has increased.
- More institutions have either established or are establishing safe reporting mechanisms at the work place.
- Digitization of key revenue collection agencies.
- Accelerated digitization of banking and financial industry.
- Digitization of port and harbour operations.
- Increasing Digitization of the Ghanaian economy.



- Automation of Superior Law Courts.
- Revision of Code of Conduct for Judges and Magistrates.
- Development of Code of Conduct for MPs.
- Remuneration for Boards/Council Members and Companies of Public Institutions boards and agencies unified.
- Establishment of 433 Audit Committees in State Institutions (83% coverage).
- Establishment of Public Complaints and Court Inspectorate Units of the Judicial Service in all regional capitals.
- Establishment of Public Relations and Complaint Units of the Police Service in all regional capitals.
- Expansion of Ghana Anti-Corruption Coalition (GACC).
- Improvement in financing of Audit Service and Anti-Corruption Agencies.
- Judicial Service developed and launched an Anti-Corruption Action Plan.
- Roll-out of Public Service Integrity Programme (PSIP), including enforcement of the Code of Conduct for Public Officers, Asset Declaration regime, Conflict of Interest rules and Gift Policy in public sector institutions intensified.
- Increase in institutions adopting sexual harassment policies at the work place.
- Introduction of Integrity Awards.
- ACAs have stepped up enforcement of anti-corruption and relevant laws.
- Extension of EITI Principles to the Oil and Gas sector.
- Positive public response to the call to report corruption.
- Investigative journalism and media expos are on the rise
- Office of the Special Prosecutor has been established to add to the legal and institutional architecture for prosecutions of corruption offences.
- Development and enforcement of Code of Ethics for MPs.
- Code of Conduct for Judges and Magistrates reviewed.
- Parliament has initiated the process to enact a Budget/ Fiscal Law.
- Special exercise to remove doubtful financial institutions from the banking and financial industry undertaken.
- More legislations introduced to improve the legal framework for fighting corruption, among them are:

- i. Petroleum Revenue Management (Amendment) Act, 2015 (Act 893).
- ii. The Public Procurement (Amendment) Act, 2016 (Act 914).
- iii. Public Financial Management Act, 2016 (921).
- iv. Ghana Deposit Protection Act, 2016 (Act 931).
- v. Office of the Special Prosecutor Act, 2018 (Act 959).
- vi. The Witness Protection Act, 2018 (Act 975).
- vii. The Right to Information (RTI) Act, 2019 (Act 989).
- viii. The Companies Act, 2019 (Act 992).
- ix. Introduction of Beneficial Ownership in the Companies Act.

- Ghana was reviewed in 2015 and 2019 under the UNCAC 1st and 2nd Cycle Reviews respectively. The first review focused on Criminalisation and Law Enforcement and

International Cooperation, whilst the second review focused on Prevention and Asset Recovery.

- Ghana has established the Financial Stability Council by Executive Instrument to enhance the stability and soundness of the financial system. This makes Ghana, the second country after Mauritius to establish such a Council in sub-Saharan Africa.

## **7. Key Challenges**

Key Challenges to the implementation of the NACAP continue to be resource allocation and low reporting.

## **8. Recommendations**

We recommend the prioritization of implementation ethics education in schools, the national cultural review programme and the enactment of the recommended anti-corruption laws including the Conduct of Public Officers' Bill.

## **9. Outlook for 2020**

For 2020, the AWP will seek to address the following, among others:

- i. Conduct Mid-Term review of the implementation of the NACAP.
- ii. Conduct an Actual Corruption Survey.
- iii. Conduct a Gender and Corruption Survey.
- iv. Introduce and implement ethics and anti-corruption education in schools.
- v. Enactment of recommended anti-corruption laws.

# SECTION ONE: INTRODUCTION AND BACKGROUND

## 1.1. Introduction

This is the fifth report on the implementation of National Anti-Corruption Action Plan (NACAP), adopted to address corruption in Ghana. The preparation of the report is part of the responsibility assigned to CHRAJ under the NACAP which is to coordinate the implementation, and monitor progress of implementation in collaboration with the National Development Planning Commission (NDPC) and MONICOM.

The report was primarily compiled from information provided by a total of 91 IPs who reported on implementation of the NACAP. In addition, it also took into consideration key activities carried out by other institutions in support of the work of NACAP. Of these, 84 IPs used the National Anti-Corruption Reporting Dashboard (NACoRD), an online tool, whereas 7 submitted hard copy reports. The report highlights progress with the implementation of prioritised activities for the period of January 1 to December 31, 2019 as well as a performance analysis of progress over the 5 years of adoption and implementation of the NACAP (2015-2019). It also presents the challenges encountered and recommendations for addressing them.

The report is made up of six sections. The first section deals with Introduction and Background. The second section sets out the 2019 Work Plan and the preparations made to enhance implementation and reporting by stakeholders. The third section presents a discussion on the status of implementation. The fourth section provides progress of Implementation, while the fifth section deals with “Performance of NACAP from 2015-2019”. The final section provides the conclusions challenges, recommendations and outlook for 2020.

## 1.2. Background

Globally, there is consensus on the need to prevent and fight corruption due to its devastating impact on human rights and sustainable development. Governance experts as well as international and regional conventions such as the UNCAC and the AUCPCC seek to promote and strengthen mechanisms for preventing, detecting, investigating and pushing corruption related offences in the public and private sectors. Corruption affects every sector of the economy, hence the need for collective ownership of anti-corruption efforts, and demonstrable commitment of all relevant stakeholders.

In this regard, the National Anti-Corruption Action Plan (NACAP) is Ghana’s strategic response to the fight against corruption and to fulfil her obligations under the two conventions. NACAP was adopted by Parliament in 2014 with a ten (10) year action plan covering the period 2015 to 2024. It seeks to mobilize stakeholder efforts and resources to holistically address the menace of corruption.

Consequently, NACAP espouses critical roles for all relevant stakeholders including government, public and private sector organisations, as well as Civil Societies. It further seeks to advocate and promote high integrity and ethical systems and practices, professional standards, as well as the effective enforcement of anti-corruption laws, premised on a three-prong approach namely Prevention, Education, and Investigations and Enforcement.

Additionally, the development and implementation of NACAP are premised on four main strategic objectives, with a vision to create a sustainable democratic society founded on good governance and imbued with high ethics and integrity. The four strategic objectives are as follows:

- i. To build public capacity to condemn and fight corruption and to make corruption a high-risk, low-gain activity;
- ii. To institutionalize efficiency, accountability and transparency in the public, private and not-for-profit sectors;
- iii. To engage individuals, media and CSOs in reporting and combating corruption; and
- iv. To conduct effective investigations and prosecution of corrupt conduct.

In order to ensure effective execution of NACAP, it has in place an implementation structure comprising:

- i. The High Level Implementation Committee (HiLIC) – It is chaired by the Chief of Staff at the Office of the President, with CHRAJ as the vice chair. This Committee is the highest decision making body in the NACAP implementation structure. It provides leadership and strategic direction, and assists CHRAJ with coordination and implementation of NACAP at the highest level. HiLIC is made up of 25 members with representation from public, private, and civil society sectors. (See Appendix A for list of HiLIC members).
- ii. MONICOM is basically responsible for tracking the status of implementation of NACAP by; assessing the effectiveness of implementation strategies and proffering technical advice to HiLIC on the achievement of planned activities, as outlined in respective AWP. It is made up of CHRAJ, NDPC, PSC, SEC, PEF and GACC.
- iii. NACAP Implementation Support Unit (NISU) is hosted by CHRAJ and serves as the Secretariat for coordinating all NACAP related activities including those implemented by relevant stakeholders. It also provides administrative and technical support to the HiLIC, the MONICOM as well as the respective Implementing Partners (IPs).
- iv. Implementing Partners (IPs) comprise all relevant stakeholders whose efforts and activities are very critical for the effective implementation of NACAP activities. IPs are expected to mainstream NACAP activities into their operations and report on same. Implementing Partners could either be Lead or Collaborating. The “Lead Implementing Partners” have the primary responsibility to undertake the specific activities, and are thus primarily responsible for the success or failure of those programmes. The “Collaborating Implementing Partners” refers to stakeholders who are either beneficiaries or are directly impacted by the implementation of the said activity, or in the position to implement those activities. The “Lead Implementing

Partners” and “Collaborating Implementing Partners” may or may not have been specifically mentioned in the NACAP document.

Each year, CHRAJ, in collaboration with the MONICOM and the HiLIC, prepares Annual Work Plans (AWPs) which seek to prioritise activities for the year, under the four strategic objectives of NACAP. In addition, the AWP captures indicators against which the state of implementation of specific activities is assessed.



## SECTION TWO: PREPARATORY ACTIVITIES AND 2019 AWP

This section takes into consideration the approach in the development of the 2019 AWP as well as the preparatory activities undertaken.

### 2.1. Preparation of AWP

For the 2019 Reporting Year, 84 Broad Activities were undertaken. These broad activities were further divided into 152 Specific Activities and 171 Indicators. (See Table 1)

Table 1: Summary of 2019 NACAP AWP Activities and Indicators

S/No.	Strategic Objectives	No. of Broad Activities	No. of Specific Activities	No. Specific Indicators
1	General Roles	2	9	14
2	Build public capacity to condemn and fight corruption and make it a high risk, low gain activity	22	50	58
3	Institutionalise efficiency, accountability and transparency in public and private service	26	43	47
4	Engage individuals, media, and CSOs in reporting and combating corruption	14	16	18
5	Conduct effective investigations and prosecution for corrupt conduct	20	34	34
<b>Total</b>		<b>84</b>	<b>152</b>	<b>171</b>

### 2.2. Preparatory Activities to Enhance Reporting

These are activities to assist IPs to identify their key roles in the 2019 AWP, disaggregating the roles of IPs according to clusters, the training of focal persons of IPs and other support given to IPs to enable them to implement the AWP and report. The IP clusters are as follows:

- Office of the President (OoP);
- Parliament of Ghana;
- Judicial Service;
- Ministries, Department and Agencies (MDAs);
- Metropolitan, Municipal and District Assemblies (MMDAs);
- Other Public Sector Institutions;
- Private Sector;

- Civil Society Organisations; and
- Media.

The AWP was sent to IPs via email and direct delivery. The AWP and Reporting Tool were made available on CHRAJ's website ([www.chraj.gov.gh](http://www.chraj.gov.gh)) for IPs to access, and report on activities implemented during the year.

## 2.3. Training of focal persons of IPs

CHRAJ continued its training programme for registered IPs on the NACAP Online Reporting Dashboard (NACoRD). Between January and March 2019, as part of activities to roll out NACoRD, CHRAJ went round all the former ten regional capitals to train focal persons of all MMDAs and CSOs, on the NACoRD and the monitoring and evaluation (M&E) framework for reporting on NACAP. CHRAJ in addition organised five training sessions for focal persons of MDAs and CSOs in Accra. In all 262 focal persons were trained in 2019. During the training, participants received unique usernames for logging onto the NACoRD for purposes of reporting. There were also practical exercises on how to access and use the NACoRD for reporting.

The NACoRD also makes provision for any IP not yet registered to apply to CHRAJ through the NACoRD platform for registration and access to use the NACoRD to report.

## 2.4. Deadline for Reporting

The deadline for the 2019 reporting cycle was set at March 30, 2020. However, due to the disruption of the covid 19 pandemic the deadline for submission of reports from IPs was extended twice, ultimately to June 17, 2020. At the end of the reporting cycle, a total of 84 IPs had submitted reports using the NACoRD while 7 IPs submitted hard copies.

## 2.5. Collation of Data

Data from the NACAP Online Reporting Dashboard (NACoRD) was extracted by the NACAP Implementation Support Unit (NISU) technical team, sorted out and cleaned for use. Reports submitted in hard copy were also sorted out and collated in appropriate format.

## 2.6. Analysis of Data

Extracted data from the NACoRD dashboard as well as the hard copy reports from implementing partners were collated under general roles and the four strategic objectives of NACAP were analysed using Excel sheet and Microsoft Word. The data extracted was analysed to ensure that it was responsive to the various reporting guidelines and specific strategic objectives.



## **2.7. Report Writing**

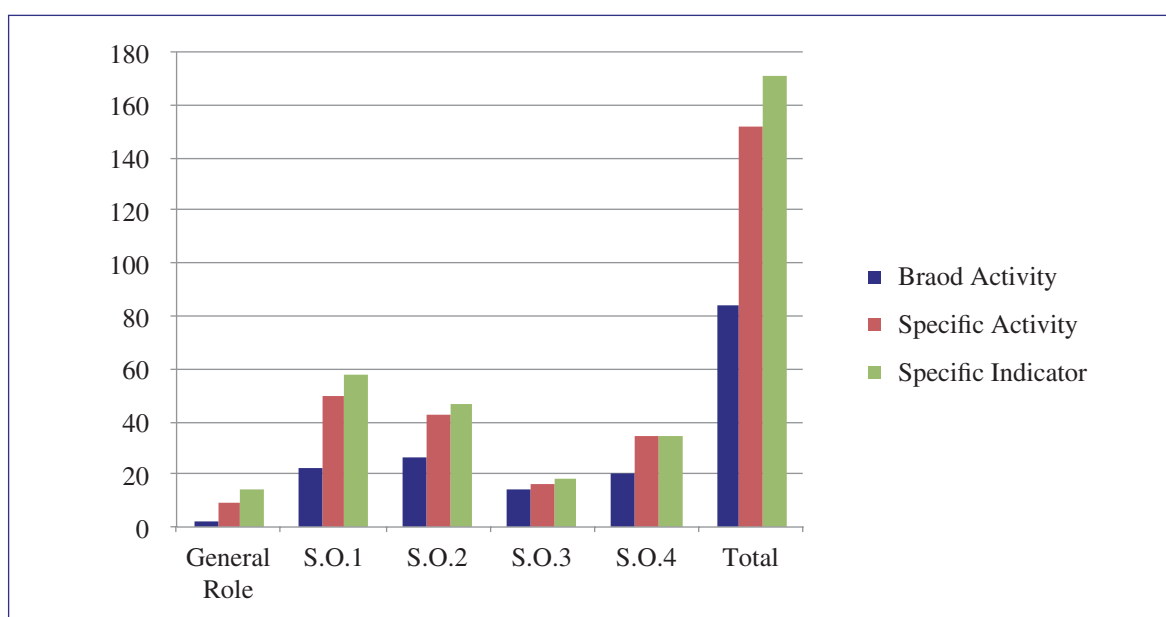
A zero draft report was put together by MONICOM with technical support from NISU. The draft report was submitted to HiLIC for review and finalisation. Final draft copy of 2019 NACAP APR was considered and approved by the HiLIC at the end of July 2019. The draft APR within the same period was submitted for publication and dissemination in the December Conference.



## SECTION THREE: STATUS OF IMPLEMENTATION

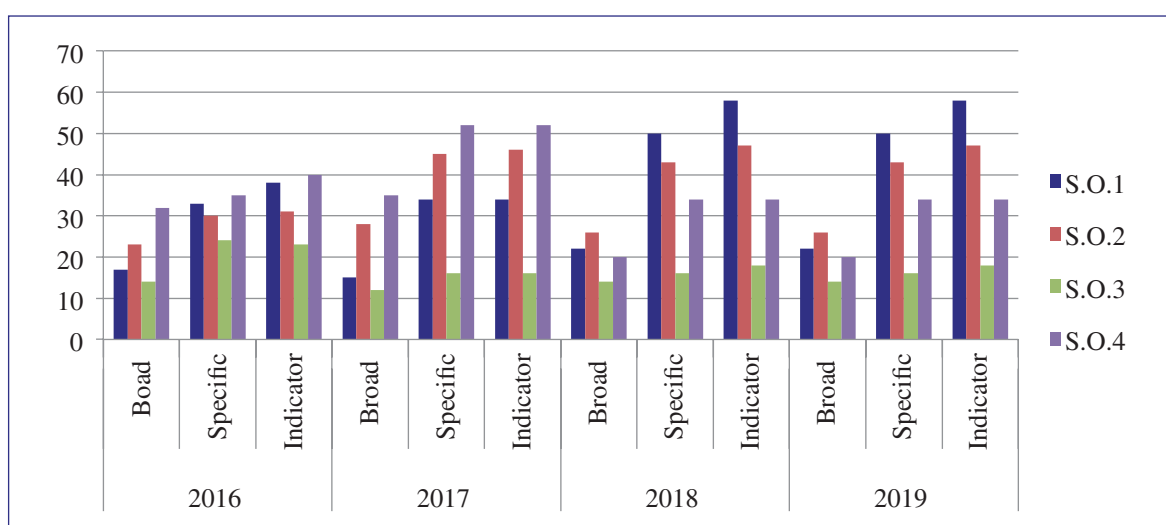
Eighty four (84) Broad Activities were prioritised under the 2019 AWP for implementation, made up of short term, medium term and long term activities. The 84 Broad Activities were divided into 152 Specific Activities and 171 Indicators for implementation under General roles and the four strategic objectives of NACAP. (See Figure 1).

Figure 1: Broad Activities, Specific Activities and Indicators for 2019



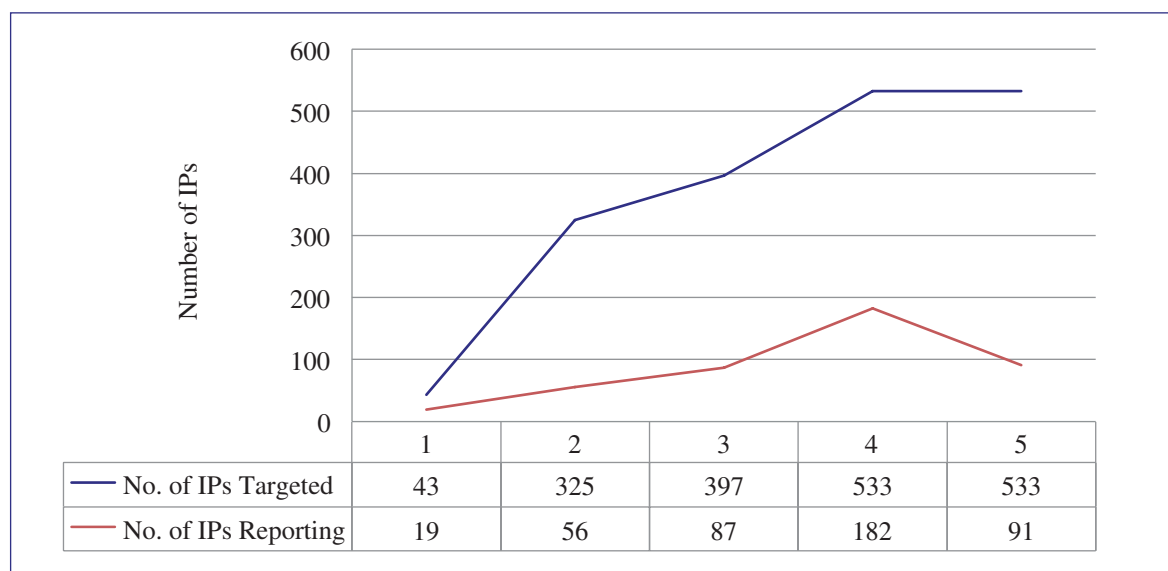
The selection of activities for implementation depends to a large extent on a number of factors, including availability of financial resources, time frame (whether activity is short, medium, or long term), capacity, and status of implementation of activities in the previous year.

Figure 2: AWP's 2016-2019



This figure shows trend in selection of broad activities divided into specific activities and indicators from 2016 to 2019.

Figure 3: Number of IPs Targeted and Number Reporting (2015-2019)



In the reporting year, there was a decline of about 50% in IPs that reported on NACAP as compared to the previous year (182 IPs). Ninety one (91) IPs reported in the reporting years as against 533 targeted. IPs reporting on NACAP have been on the increase from 2015 to 2018 (19 in 2015 to 182 in 2018). The decline in reporting of IPs in 2019 may be attributed to the challenges associated with the COVID-19 pandemic. (See Table 2).

Table 2: IPs Reporting by Clusters (2015-2019)

S/No.	IP Cluster	2015	2016	2017	2018	2019
1	Parliament of Ghana	1	1	1	-	1
2	Judicial Service	1	1	1	-	-
2	OoP	1	1	1	1	1
3	MDAs	8	27	59	47	33
4	MMDAs	-	4	11	122	44
5	Other Public Sector Institutions	4	18	10	5	7
6	Private Sector Institutions	1	1	1	-	1
7	Civil Society Organisations	3	3	3	7	4
8	Media	-	-	-	-	-
<b>Total</b>		<b>19</b>	<b>56</b>	<b>87</b>	<b>182</b>	<b>91</b>

Among the clusters, only the media had failed to report since the implementation of NACAP. The Office of the President, MDAs, OPSIs and CSOs reported consistently.

## SECTION FOUR: PROGRESS OF IMPLEMENTATION

### 4.1. General Roles

This section focuses on contextual activities that are common to all the stakeholders which may not have been captured under the four strategic objectives of NACAP. Accordingly, all IPs are expected to report on General Roles in addition to their specific roles under the four strategic objectives.

The General Roles are made up of two Broad Activities, which are sub divided into nine Specific Activities and 14 Performance Indicators. (See table 3)

Table 3: Activities and Indicators under General roles

S/No.	Broad Activity	Specific Activity	Performance Indicator
1	Implement NACAP	Report on implementation of NACAP	IPs NACAP Progress Reports
		Budget for implementation of NACAP.	Number of IPs budget for implementation of NACAP to total no. of implementing IPs budget.
		Designate Focal Persons for NACAP implementation.	NACAP focal persons-IPs ratio
		Sensitize staff on NACAP	IPs Sentisation Reoprts
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.	Audit Committees training Reports.
		Establish work place safety reporting systems/ mechanisms.	Proportion of institutions with safe reporting mechanisms to total number of IPs.
		Act expeditiously on reports of corruption and misconduct in the work place	Number of workplace corruption complaints received to total no. of workplace corruption complaints.
			IPs workplace misconduct reports.
			Number of investigations/ actions undertaken on acts of corruption.
			Number of workplace investigations/ actions
			No. of prosecutions/sanctions.
		Develop and publicise sexual harassment policies at the work place	Workplace sexual harassment policies
		Introduce measures to control absenteeism, lateness and moonlighting	Workplace ethics Guidelines/ Manual.

Table four presents the status of reports from IPs on the general roles.

Table 4: Report on the General Roles

No.	Indicator	Indicator Status (2019)
	Number of IPs reporting on the implementation of NACAP	91
	Number of IPs Budgeting for implementation of NACAP	54
	Number of IPs with designated Focal Persons	80
	Number of Staff sensitised on NACAP	1,433
	Number of Audit Committees and other structures trained	305
	Number of IPs with safe internal reporting Mechanisms	63
	Number of Corruption complaints at the Workplace	47
	Number of Misconduct complaints at the Workplace	99
	Number of IPs reporting on developing and publicizing sexual harassment policies at the work place	29
	Number of measures introduced to control abuse of office time	31

#### **i. IPs Reporting on NACAP**

Ninety one (91) IPs submitted reports on implementation of NACAP for the 2019 reporting period. Out of the 91 IPs reporting, 85 reported on General Roles, 67 on Strategic Objective 1, 78 on Strategic Objective 2, 22 on Objectives 3 and 62 on Strategic Objective 4.

#### **ii. Plan and Budget for Implementation of NACAP**

Fifty four (54) IPs reported that they specifically budgeted for the implementation of NACAP activities during the year under review. Of the 54, only 42 of the IPs indicated the budgetary provision made.

#### **iii. Designate Focal Persons for NACAP Implementation**

Eighty one (81) reported they have designated Focal Persons for coordinating NACAP implementation in their organisations. (See Appendix D for list of Focal Persons of IPs).

#### **iv. Sensitisation of Staff on NACAP**

Sixty three (63) IPs reported organising various sensitisation programmes on NACAP for staff using various methodologies including staff durbar, management meetings, induction training and staff capacity building workshops, for over 1,433 management and staff members. Some IPs also reported organising sensitization programmes for their staff but they did not provide specific figures on the number of persons that benefited. In addition, staff of Public Sector Institutions, MDAs and MMDAs as well as CSOs, benefitted from training programmes organised by CHRAJ on NACAP and the NACoRD.

## **v. Take Measures to Prevent Corruption and Abuse of Office**

Under this indicator, IPs were required to mainstream basic anti-corruption efforts in their everyday activities including strengthening internal controls, monitoring adherence to professional ethics, good governance and best utilisation of state resources. The measures include training of Audit Committee members and other structures, and establishing Safe Reporting Systems/Mechanisms at the Workplace.

### **a) Training of Audit Committee members and other structures**

IAA reported that it constituted 61 Audit Committees and trained 305 Audit Committee members. The IAA further reported providing training for other structures including internal auditors, procurement and accounts officers on the Public Procurement Act processes and the Public Financial Management Regulations.

Fifty-six (56) Implementing Partners also reported providing training for their Audit Committees members.

### **b) Safe Reporting Systems/Mechanisms at the Workplace**

Sixty three (63) reported they had operationalised safe reporting mechanisms at their workplaces. Fifty two (52) IPs indicated having more than one mechanism while the others only indicated that they had safe reporting mechanisms. The mechanisms include the following:

- Ethics and Compliance Officers/Desks.
- Special Investigations Offices.
- Effective Supervision.
- Complaint/Suggestion Boxes placed at vantage points under control.
- Public Relations and Complaints Committee/Unit.
- Complaint Desks.
- Hotlines, and toll-free call centres.
- Confidential on-line reporting platforms/systems.

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

Twenty five (25) IPs reported having received a total of 146 complaints in relation to acts of corruption and various forms of misconduct, out of which 59 complaints were dealt with. Actions taken included 23 persons sanctioned, 10 asked to refund monies, 8 persons suspended, 7 cautioned, 7 declined medical refund for a year, 3 had their appointments terminated, and one person was imprisoned.

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

Twenty nine (29) IPs reported having developed sexual harassment policies in their workplaces in 2019. 15 of them further reported disseminating the policies to staff through various methods,

including staff durbars, corporate websites/intra-nets, circulation of handbooks and Service Human Resource Manuals. (See Appendix E for list of IPs with Sexual Harassment Policies as at 2019 reporting period)

#### viii. Measures to Control Abuse of Office Time

Thirty two (32) IPs reported that, they had introduced additional measures to monitor and control lateness to work, absenteeism and moonlighting. These measures include electronic swipes or clock-in devices, attendance book, employee absence reporting systems, employee movement books, regular walk-in supervisions, queries issued due to absenteeism, and analysing monthly salary validation reports.

## 4.2. Implementation of Strategic Objective 1

Strategic Objective 1 seeks to **Build Public Capacity to Condemn and Fight Corruption and to Make Corruption a High-Risk, Low-Gain Activity.**

Under this Strategic Objective, 22 Broad Activities (out of a total of 28) were selected. The 22 broad activities were further divided into 50 Specific Activities and 58 performance indicators for implementation. Out of this, IPs reported on 15 broad activities, 32 specific activities and 38 indicators. (See table 5).

Table 5: Activities and Indicators under Strategic Objective One

STRATEGIC OBJECTIVE 1			
S/N	Broad Activity	Specific Activity	Indicator
1	2. Organize regular public education and awareness programmes on the evils of corruption and the ethos of anti-corruption in MDAs, general public, and private sector organizations	Organize programmes for the private sector nation-wide	Proportion of private sector programmes to the total no. of programmes nation-wide
		Organize public education and awareness programmes for the general public nationwide	Proportion of regional level public education programmes to the total number of programmes nationwide
		Organize regular public education and awareness programmes in MDAs	Proportion of MDA public education & awareness programmes to the total no. of public education & awareness programmes
2	3. Create Public fora / community outreach/clinics at District Level	Conduct outreach programmes in selected MMDAs	Proportion of MMDAs outreach programmes to the total no. of MMDAs



STRATEGIC OBJECTIVE 1			
S/N	Broad Activity	Specific Activity	Indicator
3	5. Mainstream Anti-Corruption, Ethics and Integrity in Public, Private Sector, Civil Society and Religious Organization	Publish an issue-based anti-corruption, ethics and integrity manual as part of organizational culture	Anti-corruption, ethics and integrity manual
4	6. Introduce modules and elements to highlight and strengthen good ethical values in primary, secondary and tertiary, formal and non-formal education	Develop road map for the dissemination of ethical values manual	Ethical values manual road map
		Hold consultations to introduce the modules	No. of consultative meetings
5	7. Develop co-curricular anti-corruption activities, such as integrity clubs in Junior and Senior High schools.	Develop guidelines for the establishment of integrity clubs in Junior and senior high schools	Integrity clubs guidelines for SHS/JHS
		Facilitate the formation and revamping of integrity clubs in 20 Senior High Schools (SHS) in each Region	Proportion of regional integrity clubs established to the total no. of SHSs nationwide
		Facilitate the revamping of integrity clubs in 200 Junior High Schools nationwide.	Proportion of integrity clubs revamped to the total no. of integrity clubs established in Junior high schools nationwide
6	8. Educational corruption fighting materials for public schools and universities, and general public	Hold consultations on development of anti-corruption materials for schools and universities	No. of consultations meetings
		Develop a road map for the preparation of anti-corruption educational materials for public schools and universities	Anti-corruption educational materials roadmap
		Develop and disseminate anti-corruption materials for the general public, schools, universities and the general public	No. of dissemination fora for Anti-corruption educational materials
7	10. Organize awareness raising programmes on negative impact of money laundering and financing of terrorism on and sustainable development security for the general Public	Organise awareness creation programme on the negative impact of money laundering and financing of terrorism for the general public	No. of awareness creation campaigns
		Organize sensitization programmes on the negative impact of money laundering and financing terrorism for the public through the media	No. of media campaigns

STRATEGIC OBJECTIVE 1			
S/N	Broad Activity	Specific Activity	Indicator
8	11. Conduct assessment of Institutions/ Agencies on the integration of corruption prevention measures in their work programmes	Conduct assessment on institutions, more vulnerable to corruption on the integration of prevention measures in their work programmes	No. of Institutions and Agencies
9	14. Enforce the Public Financial Management Legislation	Pass the Public Financial Management (PFM) regulations	PFM regulations
		Create awareness on the Financial Management Law and the Public Procurement processes	Awareness creation report on PFM Act
10	18. Intensify public education on linkage between corruption and fundamental human rights and freedoms to the general public, MDAs and CSOs	Conduct public education programmes on linkage between corruption and fundamental human rights for MDAs	MDAs public education programmes report
		Conduct public education programmes on the linkage between corruption and fundamental human rights for CSOs	CSOs public education programmes report
		Conduct public education programmes on the linkage between corruption and fundamental human rights for the general public	General Public Education programmeE0073 report
11	19. Establish special awards on integrity at all levels	Develop criteria for establishing the special awards using multi-stakeholder consultative processes	Integrity awards criteria
		Institute Integrity Awards at public/ private/ CSO institutions	No. of integrity awards
12	20. Strengthen anti-corruption capacity at the District and Regional levels and encourage whistle blowing	Conduct training on anti-corruption and whistle-blowing at the District and Regional levels	Beneficiaries training report
		Create public awareness on whistle blowing in the Regions and Districts	Whistle-Blowing materials Awareness creation Report
		Disseminate whistle-blowing and other anti-corruption materials	Whistle-Blowing materials dissemination Report

STRATEGIC OBJECTIVE 1			
S/N	Broad Activity	Specific Activity	Indicator
13	21. Institute whistle-blowing mechanisms at District and Regional levels	Create awareness on the confidential and safe reporting mechanisms and encourage citizens to use them	Confidential & safe reporting mechanisms Report
		Put in place confidential and safe reporting mechanisms (i.e. hotlines, reporting platforms, complaint/ suggestion boxes) for Whistle- blowing at District & Regional levels	
14	22. Undertake measures to prevent corruption in the election of Chief Executives and members of MMDAs	Commission a study on the causes of corruption in the confirmation of Chief Executives and election of assembly members	Study Report
15	23. Ensure transparent, equitable and non-partisan allocation of public/state resources at all levels	Track the allocation of public/ state resources at all levels	Public/state resources tracking Report
16	26. Develop and implement code of conduct for corporate bodies, traditional authorities and not-for-profit Organisations	Develop code of conduct for CSOs/ NGOs	CSOs/ NGOs Code of conduct
		Develop code of conduct for corporate bodies	Corporate Bodies Code of Conduct
		Develop code of conduct for Faith-Based Organisations	Faith-Based Organisations Code of conduct
		Develop code of conduct for traditional authorities	Traditional Authorities Code of Conduct
<b>Total</b>	<b>16</b>	<b>32</b>	<b>38</b>

Sixty-seven (67) IPs (30 MMDAs, 25 MDAs, 4 CSOs, 5 OPSIs, OoP, Parliament of Ghana and Private Sector) reported on activities implemented under this Strategic Objective.

**i. Organize regular public education and awareness programmes on the evils of corruption and the ethos of anti-corruption in MDAs, general public, and private sector**

This Broad Activity has three Specific Activities namely;

- a) Organize programmes for Private Sector nation-wide;
- b) Organize public education and awareness programmes for the general public nationwide; and
- c) Organize regular public education and awareness programmes in MDAs.

Lead IPs required to report on this activity are CHRAJ and PEF, while the collaborating IPs are NCCE and CSOs. All the two lead IPs reported accordingly. In all, 13 IPs comprising 5 MDAs, 1 MMDA, 3 OPSIs, 3 CSOs and 1 Private Sector Organisation organised over 15,257 public education and awareness programmes on the activity. Details on the effective implementation of the Specific Activities are as follows:

**a. Organize programmes for Private Sector nation-wide**

PEF reported that it organised training programmes for private sector organisations in the northern and southern parts of Ghana. CHRAJ collaborated with PEF to organize public education for some of its members in the private sector. GACC reported that it organized 10 programmes with the umbrella body of private sector organizations being in attendance. Alliance for Integrity reported that it organised a private sector dialogue on the need to promote integrity in light of the Africa Continental Free Trade Area (AfCFTA) with a total of 45 participants (13 females and 32 males).

**b. Organize public education and awareness programmes for the general public nationwide**

The NCCE organised 13,469 programmes in 275 Districts for 945,327 participants (432,477 males and 512,850 females) with support from Accountability, Rule of law and Anti-Corruption Programmes (ARAP). The NCCE further held focus group discussions in all the 16 Regions of Ghana. CHRAJ organised 1,683 public education and awareness programmes on corruption through its Regional and District offices.

Ghana Anti-Corruption Coalition (GACC) collaborated with the Volta-RCC to organize a regional float in Ho in commemoration of the United Nations International Anti-Corruption Day (IACD) celebration to sensitize the public on the cost of Corruption.

GII Consortium (GII, GACC and SEND Ghana) provided Citizen Groups (CGs)/Anti-Corruption Champions (ACCs) with support to continue their public education activities at the district level using various platforms including social group gatherings, radio and information centres. The public education centred on areas including manifestations of corruption, citizens' role in holding public officers accountable and fighting corruption through available reporting systems at the district level. A total of 8,815 (Male 3,763, Female 5,052) persons were sensitized through face to face interventions, in addition to others who were reached through radio programmes.

GII collaborated with NCCE and CHRAJ at the regional and district levels to educate citizens on corruption. It also collaborated with the Regional offices of the Lands Commission in the Western, Eastern, Ashanti, Brong Ahafo, Northern and Upper East regions to organize open field community sensitization and awareness programmes for residents of Whindo, Asokore, Daaporee and New Daamang. In all, 650 community members benefited from the Community Mobile Land Clinic.

The Alliance for Integrity organised an awareness raising event on the Right to Information (RTI) Bill. A total of 75 participants comprising 29 females and 46 males were present for the event.

**c. Organize regular public education and awareness programmes in MDAs**

GII Consortium (GII, GACC and SEND Ghana) in collaboration with the Ghana Audit Service organised a public forum that focused on the application of the disallowance and surcharge mandate of the Auditor General of Ghana. The forum brought together representatives of Government Agencies, Civil Society Groups, Development Partners and the Media. The GII again held a one-day workshop for members of the Parliamentary Committee on Defence and Interior to enhance their knowledge on Defence and Security programmes. It also discussed the role of effective oversight in holding defence institutions accountable.

**ii. Create Public fora /community outreach/clinics at District Level**

The specific activity to be implemented under this Broad Activity is to *conduct outreach programmes in selected districts*. Lead IPs required to report on this activity are CHRAJ and CSOs, while NCCE, MMDAs, RCCs, and the PSC are the collaborating IPs. The lead IPs that reported were CHRAJ and GACC. In all, 19 IPs (1 CSO, 2 OPSIs and 16 MMDAs) reported on this activity.

GACC reported that it undertook 10 outreach programmes for 5,634 beneficiaries. In addition, the NCCE conducted 1,559 outreach activities in some selected communities within Metropolitan, Municipal and Districts Assemblies. CHRAJ collaborated with NCCE to train over 200 persons in selected districts nationwide on the legal regimes in relation to Public Accountability and Whistle Blowing mechanisms. Nanumba South District Assembly engaged some Faith Based Organizations (FBOs), artisans, Public Sector Institutions, Traditional Authorities amongst others on the Whistle-blower Act, legal regimes of anti-corruption and the NACAP. Sene East District Assembly organised four outreach programmes for 350 beneficiaries (210 Males and 140 Females). Tain District Assembly held 40 awareness programmes while Jirapa Municipal Assembly held ten (10) outreach programmes during the reporting year.

**iii. Mainstreaming anti-corruption, ethics and integrity in public, private sector, civil society and religious organisations**

This Broad Activity has two Specific Activities which are;

- a) Develop anti-corruption, ethics and integrity as part of organizational culture; and
- b) Publicise anti-corruption, ethics and integrity as part of organizational culture.

Lead IPs required to report on this activity were CHRAJ, PSC, NDPC, GES/MoE and PEF, while the collaborating IPs are Religious Bodies, Private Sector Organizations. CHRAJ was the only Lead IP that reported. A total of 9 IPs (7 MDAs and 2 OPSIs) reported under the two Specific Activities as follows:

**a. Develop anti-corruption, ethics and integrity as part of organizational culture**

CHRAJ collaborated with relevant stakeholders to develop ethics and integrity tools for adaptation and use by Public Sector institutions. SSNIT indicated that anti-corruption, ethics and integrity

rules are provided for in the Institution's Human Resource Manual and Employee Handbook. Ministry of Lands and Natural Resources (MLNR) as well as Ministry of Works and Housing (MWH) reported that integrity issues were embedded in their Civil Service Code of Conduct. Ministry of Sanitation And Water Resource (MSWR) reported that it held ethics programmes on tender bidding for 30 contractors and suppliers. Controller and Accountant General Department (CAGD) has in place a Departmental Disciplinary Committee in operation to enforce anti-corruption, ethics and integrity rules.

#### **b. Publicise anti-corruption, ethics and integrity as part of organizational culture**

CHRAJ disseminated the ethics and integrity tools it developed to Public Sector institutions to assist their institutional central management bodies to adapt and use the tools as part of their organizational culture. Additionally, Anti-Corruption, Ethics and Integrity related materials (leaflets, fact-sheets, brochures etc.) were disseminated by CHRAJ as part of efforts to publicize ethics and integrity issues. Ministry of Lands and Natural Resources (MLNR) as well as Ministry of Works and Housing (MWH) distributed copies of the Civil Service Code of Conduct to staff. Ministry of Sanitation and Water Resources reported that all tenders were advertised in national daily newspapers to ensure transparency in procurement processes. Ministry of Information (MoI) produced short anti-corruption videos and audios which were aired on some television and radio stations.

#### **iv. Introduce modules and elements to highlight and strengthen good ethical values in primary, secondary and tertiary, formal and non-formal education**

This broad activity has two Specific Activities for implementation as follows;

- a) Develop road map for introducing the modules; and
- b) Hold consultations to introduce the modules.

The Lead IP required to report on this activity is GES and MoE while the collaborating IPs are CHRAJ, NCCE, Non Formal Education Division, EOCO, AG, MOFEP, GNAP, PS, CHASS and CSOs. The Lead IP (GES/MoE) did not report on any of the Specific Activities. EOCO, Lead Afrique and GII reported on this activity.

#### **a. Development of road map for introducing the modules**

Lead Afrique, in collaboration with GES, NaCCA, CHRAJ and other stakeholders, implemented this activity under its Basics in Anti-Corruption Education (BACE) project. The project's approach was essentially preventative and holistic, to help Ghana curb corruption and build integrity in its future generations, and therefore, improve the quality of leadership of its public services and create a punitive environment for corruption. The project seeks to build "integrity", "using public powers for the public good" as the flip side of fighting corruption, especially amongst the next generation. The following activities were undertaken:

- Contracted a team of curriculum developers from NaCCA and University of Cape Coast to develop a 6-part anti-corruption curriculum.



- Produced a 6-part animation series from the curriculum.
- Produced a students' supplementary reader to accompany the curriculum.
- Pilot-taught the curriculum in 5 schools and revised as necessary.
- Advocated to secure stakeholder buy-in of the curriculum with a national education stakeholders review meeting.
- Developed a road map for the introduction of the modules in schools.

When NACAP's Programme of Action (2015 – 2024), was developed, it envisaged under Strategic Objective 1, Activities 6 and 7 to “Introduce modules and elements to highlight and strengthen good ethical values in primary, secondary, tertiary, formal & non-formal” and “Develop co-curricular anticorruption activities, such as integrity clubs in Junior and Senior high schools”. The BACE curriculum provided CHRAJ, NCCE and all State and non-State actors with a resource in their public education programmes. When implemented, the BACE programme will assist the nation to have a dedicated curriculum for the teaching of integrity among its young people.

EOCO reported that it developed a road map to widen the scope of the sensitization workshops in primary, secondary and tertiary institutions.

#### **b. Hold consultations to introduce the modules**

Lead Afrique again reported implementing this activity under its Basics in Anti-Corruption Education (BACE) project. The organisation held consultation with all key stakeholders towards the development of materials on ethics and integrity, targeting students and the youth.

The significant change that the BACE project has brought about in anti-corruption efforts is that key players in the education, religious and governance space are now aware of the existence of the new integrity curriculum and that it's a resource for them in inculcating integrity in their students and young people. The other significant change is that the BACE curriculum has now been issued an ISBN number and has been submitted for formal assessment by NaCCA. Once NaCCA approves it, it will be in a good position to present BACE to the Ministry of Education and GES for formal adoption.

The results of the BACE project are:

- Development of the Basics in Integrity curriculum.
- Development and production of 1000 Basics in Integrity facilitators manual.
- Development and production of 5000 Basics in Integrity students' supplementary readers.
- Production of a 6-part animation series for the manual.
- Pre-testing of the new manual and curriculum in 5 schools.
- 770 Junior High & Senior High Students reached during pre-testing.
- 26 teachers reached during pre-testing.
- One mini stakeholders' meeting held in January 2019 involving 36 stakeholders from the education, government and civil society sectors.
- 52 Teachers trained as master trainers.

- Pilot-teaching of the new curriculum conducted in 5 schools for 1 school term.
- 3742 students in 7 JHS and SHS during the pilot teaching of the new manual reached and impacted.
- One national stakeholders' review meeting held in June 2019 involving 86 stakeholders from the education, government and civil society sectors.
- 137 education stakeholders reached.
- 7 major religious organisations reached.
- 22 civil society stakeholders reached.
- 2 independence governance institutions reached.
- About 416,705 people reached via traditional and social media.

EOCO reported embarking on 10 workshops in primary and second cycle institutions in Accra and its environs on good ethical values. GII created opportunities for the National Commission for Civic Education's (NCCE's) Civic Education Clubs (CECs) in four (4) tertiary institutions to engage in anti-corruption initiatives. GII financially supported the four CECs to execute action plans on quarterly basis. The CECs were also engaged in institutional debates and community outreaches.

#### **v. Develop co-curricular anti-corruption activities, such as integrity clubs in Junior and Senior High Schools**

This broad activity has two Specific Activities namely:

- a) Develop guidelines for the establishment of integrity clubs in Junior and Senior High Schools.
- b) Facilitate the formation and revamping of integrity clubs in Junior and Senior High Schools in each Region.

The Lead IPs required to report on this broad activity were CHRAJ and AuG, while the collaborating IPs are GES, NCCE, Heads of Junior and Senior High Schools, Police Service and MOFEP. The AuG one of the Lead IP, did not report.

##### **a. Develop guidelines for the establishment of integrity clubs in Junior and Senior High Schools**

CHRAJ reported that it revised its guidelines for the establishment of integrity clubs in Junior and Senior High Schools.

##### **b. Facilitate the formation and revamping of integrity clubs in Junior and Senior High Schools in each Region**

Lead Afrique reported that under its BACE project it has provided CHRAJ, NCCE and GES with the modules for co-curricular anti-corruption activities, such as the integrity clubs and civic clubs in Junior and Senior High Schools. CHRAJ also began preparations for the revamping of human rights and integrity clubs in schools.

GII launched an Annual Integrity School Programme in November 2019 that sought to promote integrity and anti-corruption behaviour amongst the youth by instilling in them a high sense



of integrity and ethical behaviour through capacity building workshops, debates, seminars and dialogues, among others.

#### **vi. Provide Educational corruption fighting materials for public schools and universities, and general public**

This Broad Activity has three specific activities namely;

- a) Hold consultations on development of anti-corruption materials for schools and universities.
- b) Develop a road map for the preparation of anti-corruption educational materials for public schools and universities.
- c) Develop and disseminate anti-corruption materials for the general public, schools, universities and the general public.

Lead IPs required to report on the broad activity are CHRAJ and EOCO, while the collaborating IPs were GACC, MoE, MMDAs, CSOs, Universities, Educational Institutions and Schools. Eleven (11) IPs (1 OPSI, 1 CSO, 1 MDAs and 8 MMDAs) reported on these activities relating to the Broad Activity.

##### **a. Hold consultations on development of anti-corruption materials for schools and universities**

Lead Afrique held a number of consultations with stakeholders toward the development of the Basic Anti-Corruption Education curriculum for schools, among them were:

- One mini stakeholders' meeting held in January 2019 involving 36 stakeholders from the education, government and civil society sectors.
- One national stakeholders review meeting held in June 2019 involving 86 stakeholders from the education, government and civil society sectors.
- Reached out to 137 education stakeholders.
- Reached out to 7 major religious organisations.
- Reached out to 22 civil society stakeholders.
- Reached out to 2 independence governance institutions.
- Reached out to About 416,705 people via traditional and social media.

##### **c. Develop and disseminate anti-corruption materials for the general public, schools, and universities**

Ghana Anti-Corruption Coalition (GACC) in collaboration with UNDP disseminated anti-corruption materials to some SHS, JHS and primary schools in three regions. EOCO and CHRAJ disseminated brochures and leaflets on the fight against corruption to the general public as well as some second cycle schools and universities.

CHRAJ disseminated Information-Sheet on NACAP to students and the general public during the Anti-Corruption and Transparency (ACT) Week and the International Anti-Corruption Day Conference organised under the theme: "NACAP: Mobilizing National Efforts and Resources

to Combat Corruption, Five Years on". In addition, CHRAJ built the capacity of 174 Public Education focal persons selected from regions and districts nationwide in (4 zonal workshops). The programme was to support participants in undertaking effective anti-corruption public education activities including how to develop anti-corruption public education materials.

Akwapim South, Sunyani West, Komenda Edina, Adansi South, Tain and Bawku MMDAs indicated that they distributed anti-corruption materials including booklets, posters, and stickers to schools.

#### **vii. Organize awareness raising programmes on negative impact of money laundering and financing of terrorism on sustainable development and security for the general public**

This Broad Activity has three Specific Activities namely;

- a) Organise awareness creation programme on the negative impact of money laundering and financing of terrorism for the general public.
- b) Organize sensitization programmes on the negative impact of money laundering and financing terrorism for the public through the media.
- c) Train selected journalists on the negative impact of money laundering and financing terrorism.

The Lead IPs required to report on these activities were CHRAJ, FIC and EOCO, while the collaborating IPs were Ministry of Interior, Security Agencies, NACOB, National Security Secretariat and the Media. All the lead IPs reported on this broad activity.

##### **a. Organise awareness creation programmes on the negative impact of money laundering and financing of terrorism for the general public**

EOCO reported that some of its officers, including Regional Directors and Unit Heads benefited from a number of conferences on the subject. It also afforded training opportunities to sixty (60) officers at the West Africa Regional Training Centre, Accra as well as sent 20 officers overseas to be trained.

CHRAJ reported that it organised a day's International Conference on Assets Recovery, Money Laundering and International Cooperation for selected MDAs, CSOs and media houses in collaboration with FIAAPP as part of the ACT Week celebrations. Twenty three (23) journalists benefited from the programme.

The BoG reported that it organised a programme on Anti-Money Laundering/Combating the Financing of Terrorism and Market Conduct sensitization for a cross section of MDAs, public and private sector organizations including banks, savings and loans institutions, finance houses, rural and community banks, forex bureaus among others.

The FIC reported it conducted trainings, orientations and sensitization workshops to deepen the awareness on Anti-Money Laundering/Combating the Financing of Terrorism and other

anti-corruption related issues for over 2,080 beneficiaries of Accountable Institutions which included: Savings and Loans Companies, Finance Houses, Microfinance Institutions, Insurance Companies, Market Operators, and Designated Non-Financial Businesses and Professions (NGOs, FBOs, Real Estate Developers, and Car Dealers). These programmes were organised in partnership with Bank of Ghana (BoG), the AML Unit, Financial Stability Department (FSD) and the Forex Bureau Unit of Other Financial Institutions Supervision Department (OFISD).

**b. Organize sensitization programmes on the negative impact of money laundering and financing terrorism for the public through the media**

EOCO through its adult education programmes on GTV in the various Ghanaian languages sensitized the general public on the negative impact of money laundering and terrorism financing.

CHRAJ reported that its ACT Week celebrations which covered topics including the negative impact of money laundering and financing of terrorism, was broadcasted on GTV as well as streamed live on the Commission's website and other social media handles.

**c. Train selected journalists on the negative impact of money laundering and financing terrorism**

EOCO trained four (4) journalists from the Daily Graphic and Citi FM on the negative impact of money laundering and terrorism financing. CHRAJ also held training for 23 staff of some media houses.

**viii. Conduct assessment of Institutions/Agencies on the integration of corruption prevention measures in their work programmes**

The Specific Activity was the same as the Broad Activity. The Lead IP required to report on this activity was NDPC, while the collaborating IPs were PSC, Fair Wages Commission and Boards of relevant Ministries and organisations. NDPC (the Lead IP) did not report on the activity.

GII indicated that the ADISS Consortium collaborated with Corruption Watch and Civil Society Coalition (CSC) to organise a roundtable on the Office of the Special Prosecutor (OSP) under the theme: *One year of the Office of the Special Prosecutor: Reflections on Progress and Challenges*. The participants were drawn from anti-corruption agencies, government, civil society organisations, development partners, the media and other key stakeholders working to promote transparency and anti-corruption in Ghana. The stakeholders discussed the OSP's areas of progress, challenges undermining its effective operation, and how civil society organisations could collaborate with the OSP in the fight against corruption.

The Consortium met with CHRAJ in 2019, as part of a series of policy engagements, on the findings and recommendations of a report on the degree to which accountability institutions such as CHRAJ, Office of the Attorney-General and Audit Service were fulfilling their mandates.

GII conducted the 2020 Ghana overview of Government Defence Integrity Index (GDI) as well as the Mining Awards Corruption Risk Assessment research.

GII in collaboration with GACC undertook a Corruption Risk Assessment (CRA) in procurement in the implementation of SDGs 3, 4 & 16 under Creating Anti-Corruption Voices. Further to this, the following policy advocacy briefs were developed:

- Addressing Corruption Risks in the Achievement of the SDG 4 (Education Sector) in Ghana;
- Addressing Corruption Risks in the Achievement of the SDG 3 (Health Sector) in Ghana; and
- Addressing Corruption Risks in the Achievement of the SDG 16 (Justice Delivery System) in Ghana.

#### **ix. Enforce the Public Financial Management Legislation**

This Broad Activity has two specific activities.

- a) Pass the Public Financial Management (PFM) regulations.
- b) Create awareness on the Financial Management Law and the Public Procurement processes.

Lead IPs required to report on this activity were MoF, Ghana Police Service, A-G and Internal Audit Agency (IAA), while the collaborating IPs are CHRAJ, EOCO, Judicial Service, Public Accounts Committee and GRA (Customs Division).

Five (5) MDAs and 1 CSO reported on activities relating to the enforcement of the Public Financial Management Legislation.

##### **a. Pass the Public Financial Management (PFM) Regulations**

MoF reported that the Public Financial Management Regulations, 2019 (L.I.2378) to guide the implementation of the PFM Act, 2016 (Act 921) was passed in the year.

##### **b. Create awareness on the Financial Management Law and the Public Procurement processes**

The MoF organised 17 awareness programmes on the Public Financial Management Act, 2016 (Act 921) at national, regional and district levels. The Internal Audit Agency held orientations on the subject for 55 Audit Committees of Covered Entities and 168 sub-Audit Committees of the Ghana Health Service. The NPRA held training on the PFM Act for its Board, Executive and Management teams. The Ghana Police Service created awareness on the PFM through public education discussions on radio and television nation-wide.

GACC organised sensitization programme for 19 Procurement Officers (14 males and 5) from selected public institutions on public procurement and open contracting.

#### **x. Intensify public education on linkage between corruption and fundamental human rights and freedoms to the general public, MDAs and CSOs**

This Broad Activity has three Specific Activities as follows;

- a) Conduct public education programmes on the linkage between corruption and fundamental human rights for MDAs.
- b) Conduct public education programmes on the linkage between corruption and fundamental human rights for CSOs.
- c) Conduct public education programmes on the linkage between corruption and fundamental human rights for general public.

The lead IP required to report on this activity is CHRAJ, while the collaborating IPs are Human Rights NGOs, GACC, NCCE, and CSOs.

**a. Conduct public education programmes on the linkage between corruption and fundamental human rights for MDAs**

CHRAJ organised 203 local and international programmes for Ministries, Departments and Agencies (MDAs). The Ministry of Works and Housing sensitized its staff on the linkage between corruption and fundamental human rights.

**b. Conduct public education programmes on the linkage between corruption and fundamental human rights for CSOs**

CHRAJ organised nine (9) awareness creation programmes on the linkage between corruption and fundamental human rights for selected Civil Society Organizations (CSOs).

**c. Conduct public education programmes on the linkage between corruption and fundamental human rights for the General Public**

CHRAJ organised a dialogue for selected stakeholders which sought to highlight the inter-connection between human rights and corruption during the celebrations of the International Human Rights Day in December 2019.

**xi. Establish Special Awards on integrity at all levels**

This Broad Activity has two specific activities namely;

- a) Develop criteria for establishing the special awards using multi-stakeholder consultative processes.
- b) Institute Integrity Awards at public/ private/ CSO institutions.

The lead IP required to report on this activity is the OoP, while the collaborating IPs were MMMDAs, MDAs, Private Sector and NGOs. Eight (8) IPs (5 MDAs, 1 MMMDA, and 2 CSOs) reported on the Broad Activity.

**a. Develop criteria for establishing the special awards using multi-stakeholder consultative processes**

Ghana Integrity Initiative (GII) reported it developed the criteria for establishing its special awards on integrity.

**b. Institute Integrity Awards at public/ private/ CSO institutions**

GII in collaboration with GACC established and held its maiden Integrity Awards aimed at honouring public institutions and individuals who made enormous impact in the fight against corruption. The Auditor General, Mr. Daniel Domelevo won the maiden integrity personality award.

**xii. Strengthen anti-corruption capacity at the District and Regional levels, and encourage Whistleblowing**

This Broad Activity has three specific activities namely;

- a) Conduct training on anti-corruption and whistle-blowing at the District and Regional levels;
- b) Create awareness on the confidential and safe reporting mechanisms and encourage citizens to use them; and
- c) Disseminate whistle-blowing and other anti-corruption materials.

The Lead IPs required to report on this activity were CHRAJ, EOCO and IAA, while the collaborating IPs are NCCE, RCCs, MMDAs, and AuG. IAA was the only Lead IP that did not report on this activity. Twenty three (23) IPs (1 MDA, 2 OPSIs and 20 MMDAs) reported on activities in relation to the Broad Activity.

**a. Conduct training on anti-corruption and whistle-blowing at the District and Regional levels**

CHRAJ held three training workshops on anti-corruption and whistle-blowing at regional and district levels for 2000 beneficiaries. The workshops focused on investigation of anti-corruption and whistle-blowing complaints. EOCO organized training on whistle blowing for Regional Directors and Unit Heads.

**b. Create public awareness on whistle blowing in the regions and districts**

Nineteen (21) IPs (2 OPSIs, 1 MDA, 2 CSOs and 17 MMDAs) carried out 2,975 public awareness and whistle blowing programmes in the regions and districts through various means.

NCCE held 1,216 Awareness programmes at the regional and district levels on whistle blowing. The NCCE also organized symposia for 14 Tertiary Institutions on whilstle blowing across the country. Awutu Senya West District Assembly supported NCCE with vehicles and fuel to create awareness on whistle blowing. EOCO reported that its Regional Directors created public awareness on the subject in all regions. EOCO has also put in place a reward package for persons who blow the whistle. CHRAJ carried out 1,652 anti-corruption educational programmes on whistle blowing. Adentan Municipal Assembly sensitized ten (10) identifiable groups in the Municipality on whistle blowing. Nanumba South District Assembly organized 40 programmes of which 1,927 participants (1,195 males and 732 females) benefited. Nkwanta South Municipal Assembly also trained 115 persons on whistle-blowing. GACC also held five (5) radio programmes to discuss issues related to whistle-blowing.



**c. Disseminate whistle-blowing and other anti-corruption materials**

Fifteen (15) IPs (1 MDA and 14 MMDAs) disseminated 3,856 whistle-blowing and anti-corruption materials of diverse contents, such as ABCs of Corruption, Guidelines on Conflict of Interest, and A Guide to Whistleblowing in Ghana.

EOCO disseminated five hundred copies of leaflets of anti-corruption materials. Nanyumba South District Assembly also distributed 500 anti-corruption materials to community members of the district. CHRAJ and Gomaa West District Assembly disseminated copies of "ABC of Corruption", guidelines on conflict of interest as well as materials on whistle blowing in Ghana.

**xiii. Institute whistle-blowing mechanisms at District and Regional levels**

This Broad Activity has two Specific Activities namely;

- a) Create awareness on the confidential and safe reporting mechanisms and encourage citizens to use them; and
- b) Put in place confidential and safe reporting mechanisms (i.e. hotlines, reporting platforms, complaint/suggestion boxes) for Whistle- blowing at District & Regional levels.

The Lead IPs required to report on these activities are Regional and District Coordinating Councils, while the collaborating IPs were MDAs, MMDAs, CHRAJ and EOCO. RCCs from Central, Volta and Northern Regions of Ghana reported on this broad activity. Thirty-five (35) IPs (9 MDAs, 1 OPSI and 25 MMDAs) reported on the Broad Activity.

**a. Create awareness on the confidential and safe reporting mechanisms and encourage citizens to use them**

The Northern Regional Coordinating Council (RCC), MoFAD, MLNR, MoPI, MWH, SSNIT, and Sunyani West District Assembly sensitized staff of their institutions on confidential and safe reporting systems. Adentan Municipal Assembly sensitized five resident associations of the municipality. Awutu Senya West District Assembly was granted 30 minutes airtime by Enyidado FM to create awareness on corruption and safe reporting.

**b. Put in place confidential and safe reporting mechanisms (i.e. hotlines, reporting platforms, complaint/suggestion boxes) for Whistle- blowing at District & Regional levels**

Thirty-four (34) IPs (1 OPSI, 8 MDAs and 25 MMDAs) reported having put in place confidential and safe reporting mechanisms for whistle-blowing at district and regional levels.

These mechanisms included:

- Public complaints units;
- Hotlines;
- Website (online); and
- Suggestion boxes.

#### **xiv. Undertake measures to prevent corruption in the election of Chief Executives and Members of MMDAs**

The Specific Activity under this Broad Activity is to *Commission a study on the causes of corruption in the confirmation of Chief Executives and election of Assembly members.*

The Lead IPs required to report on this activity were EC and CHRAJ, while the collaborating IPs are Security Agencies, MMDAs, RCCs and NCCE. Five (5) MMDAs reported they undertook some measures to prevent corruption in the election of Chief Executives and members of MMDAs.

The measures include education on election of Assembly Members and MMDCEs, and engagement with stakeholders on the subject.

#### **xv. Ensure transparent, equitable and non-partisan allocation of public/state resources at all levels**

The Specific Activity under this Broad Activity was to *Track the allocation of public/ state resources at all levels.*

The Lead IPs required to report on this activity were MoF, Parliament, and OoP, while the collaborating IPs are RCCs, MMDAs, and MWH. A total of 31 IPs (OoP, 1, Parliament, 1 OPSI, 2 CSOs, 7 MDAs, and 19 MMDAs) instituted some measures to ensure transparent, equitable and non-partisan allocation of public/state resources.

The Office of the President (OoP) in collaboration with the Office of the Administrator General (OAG) visited 10 Regions to track the level of compliance of Spending Officers and Asset Managers with section 52 of the Public Financial Management Act, 2016 (Act 921). Section 52 requires spending officers and asset managers to ensure that proper control systems exist for the custody and management of Assets. OoP through OAG monitored and updated Properties and Assets of Government of 26 Metropolitan, Municipal and District Assemblies (MMDAs), within the Greater Accra Region.

MoF ensured all payments were made through the GIFMIS to all relevant Institutions which can be traced to the various reports that were generated from the system for all releases, actual payments and outstanding payments. GACC, through its Local Accountability Network (made up of civil society groups at the local level), monitored projects implemented with State resources in 12 Districts in the Ashanti, Bono, Bono East, Northern and Savanna Regions.

### **4.3. Implementation of Strategic Objective 2**

Strategic Objective 2 seeks to **Institutionalise Efficiency, Accountability and Transparency in Public, Private and Not-for-Profit Sectors**. Under this Strategic Objective, there are 26 Broad Activities which are further divided into 43 Specific Activities for implementation. Twenty (20) Broad Activities and 30 Specific Activities were reported on by IPs. (See table 6)



Table 6: Activities and Indicators under Strategic Objective 2

STRATEGIC OBJECTIVE 2			
S/N	Broad Activity	Specific Activity	Indicator
1	1. Conduct systemic examination of vulnerable institutions, MDAs and Public Institutions to identify and plug loopholes	Train selected officers to conduct system examination	No. of officers
		Conduct systemic investigations in selected MDAs	No. of MDAs systems
2	4. Introduce computerised and net-based system in all revenue collection/ generation Agencies	Implement the computerised and net-based system in at least twenty (20) revenue collection/ generation Agencies	No. of computerized and net-based systems revenue collection/ generation agencies
		Sensitise the general public on the computerized and net-based system.	No. of sensitisation programmes
			No. of participants
3	5. Simplify procedures of tax assessment, collection and payment verification	Organize educational programmes on the procedures on tax assessment, collection and payment verification	No. of educational programmes
			No. of participants
4	8. Build capacity of MDAs for transparent use of public resources	Conduct training needs assessment on selected MDAs.	Proportion of MDAs to total no. of MDAs.
		Organize training on public procurement processes for newly constituted Entity Tender Committees (ETCs) of MDAs	Proportion of newly trained ETCs to total no. ETCs of MDAs
			No. of training programmes
5	9. Extend EITI principles in the Oil and Gas sector	Explore the scope of the Common Global Reporting Framework for Oil and Gas sales transparency for collaboration with oil producing countries	Global Reporting Framework
		Participate in the Inaugural Summit Meeting on Oil Sales Transparency as well as the EITI trading Transparency Working Group meeting	Summit Report
6	10. Develop and implement Customer Service Charters in all MDAs, public and private sector Institutions	Conduct training on generic Customer Service Charter for selected MDAs	Training report
		Adopt and implement Customer Service Charters in selected MDAs	

STRATEGIC OBJECTIVE 2			
S/N	Broad Activity	Specific Activity	Indicator
7	11. Ensure that MDAs and MMDAs prepare financial statements on time for audit	Issue notices to MDAs and MMDAs, at end of each financial year, to prepare financial statements in accordance with PFM Act, 2016 (Act 921)	Compliance Notices
		Sanction Heads of MDAs and MMDAs for not preparing financial statements on time for audit in accordance with Act 921	Compliance report
8	12. Establish and strengthen Audit Report implementation Committees in all MDAs and MMDAs.	Establish Audit Committees in line with the Public Financial Management Act, 2016 (Act 921)	Audit Committees training report
		Provide training for Audit Committees in the Public Sector	Audit Committees training report
9	14. Enact law setting ceiling on political party financing and election expenditures.	Initiate processes on drafting a bill on setting ceiling on political party financing and election expenditures	Draft Political Party Financing Bill
10	15. Establish a Parliamentary Committee to follow-up on PAC recommendations on the AuG's report	Establish a Parliamentary Committee to follow-up on PAC recommendations on AuG Reports	Extent of establishment of Parliamentary Committee on PAC recommendations
11	16. Enact a Law on Code of Conduct for Public Officers	Enact Conduct for Public Officers Bill	Conduct of Public Officers' Act
		Monitor compliance with Code of Ethics for MPs	MPs Code of Ethics report
12	21. Create and operationalise Integrity Committees/Ethics Committees within State Institutions	Introduce Integrity tools for use by state institutions	Proportion of institutions provided with integrity compliance tools to total number of state institutions
			Extent of training on application of the tools for Ethics Desks officers
		Monitor performance of Ethics Desks/ Committees in Public Sector institutions	Field visit reports
		Create and operationalise Integrity Committees/Ethics Committees within State Institutions	Proportion of Ethics Desks/ Committees established in other public sector institutions to the total number of Ethics Desks /Committees in MMAs /MDAs

STRATEGIC OBJECTIVE 2			
S/N	Broad Activity	Specific Activity	Indicator
13	22. Develop and Implement Public Service Integrity Programme	Monitor Compliance of the public sector with operationalization of Ethics Committees	Ethics Committee Reports
14	25. Enforce conflict of interest rules and educate public officers on conflict of interest	Enforce conflict of interest rules in selected MDAs	Conflict of interest rules & compliance report
		Organise educational programmes on conflict of interest for selected MDAs	Workshop & seminar reports
15	26. Request public officers to disclose personal interests, e.g. affiliations, upon taking up public appointment	Develop a framework for public officers to disclose personal interest	Public Officers interest Disclosure Framework
16	28. Strengthen the capacity of MMDAs for accountable and effective service. delivery at the district level	Organize training and sensitization programmes for Chief Executives, Finance Committees and Presiding Members of MMDAs	Workshop reports
			Number of participants
		Sensitize District Assemblies on the New Local Governance Act, 2016 (Act 936)	Proportion of MMDAs sensitized to the total number of MMDAs
17	29. Appoint CEOs of State Institutions through open, competitive and transparent processes	Recruit CEOs through open, competitive and transparent processes including advertising vacant positions	Number of CEOs
18	30. Create civic awareness to enable the public to demand accountability from public officials	Sensitize the public on accountability mechanisms. (consult with NCCE)	Workshop reports
		Undertake mapping of social accountability mechanisms	Presence of Social Accountability Mechanisms
19	32. Strengthen GACC and widen its membership to include Human Rights Organizations.	Develop new strategic plan to guide the operations of GACC for the next five years.	Presence of CHRAJ strategic plan
		Develop protocols to admit new members including Human Rights Organisations.	Presence of Admissions procedures & protocols Manual
20	43. Develop and implement public assets management system.	Engage stakeholders in consultations on developing a Public assets management system.	Workshop reports
<b>Total</b>	<b>20</b>	<b>30</b>	<b>38</b>

In all, 78 IPs reported on this Strategic Objective consisting of forty (40) Metropolitan, Municipal, District Assemblies (MMDAs), twenty-nine (29) Ministries, Departments and Agencies (MDAs), four (4) other Public Sector Institutions (OPSI), the Office of the President (OoP), Parliament of Ghana, two (2) Civil Society Organisations (CSOs), and one (1) Private Sector (PS).

### **i. Introduce Computerised and Net-based System in all Revenue Collection/Generation Agencies**

The leads IPs expected to report under this Broad Activity are Ghana Revenue Authority (GRA) and Ministry of Finance (MoF), while the collaborating IPs are the other revenue collection agencies. This Broad Activity has two Specific Activities namely:

- a) Implement the computerised and net-based system in at least twenty (20) revenue collection/ generation Agencies.
- b) Sensitise the general public on the computerized and net-based system.

MoF reported that it has started implementation of computerized and net-based systems and organised 19 sensitization programmes on the Integrated Tax Application and Preparation Systems (iTAPS) for 2,114 staff and stakeholders of revenue collection agencies.

### **ii. Simplify procedures of tax assessment, collection and payment verification**

Under this Broad Activity, the leads IPs expected to report are GRA and MoF. The collaborating IPs expected to report are the other revenue collection agencies and Ministry of Information (MoI). The Specific Activity under this broad activity is to *organize educational programmes on the procedures on tax assessment, collection and payment verification*.

MoF reported that it collaborated with GRA to organise four (4) different programmes to educate selected stakeholders on tax issues. A total of 240 persons participated in the programmes.

### **iii. Build Capacity of MDAs for transparent use of public resources**

Under this Broad Activity, the lead IPs required to report were MoF, Auditor General (AuG), CHRAJ, and Chief Executive Officers (CEOs) of state institutions. None of the Lead IPs reported on the activity.

This Broad Activity has two specific activities namely;

- a) Conduct training needs assessment on selected MDAs.
- b) Organize training on public procurement processes for newly constituted Entity Tender Committees (ETCs) of MDAs.

The IAA reported that it trained a total of 1,100 Management staff and internal auditors of 144 covered entities in the following areas; Enterprise Risk Management (ERM), procurement process and audit, financial statement audit, risk based internal audit process, information technology audit and interpersonal skills for internal auditors.

#### **iv. Extend EITI Principles to the Oil and Gas Sector**

Under this Broad Activity, the Lead IPs are MoF, GRA, GNPC, Petroleum Commission and MoEn, whilst the collaborating IP is the Extractive Industries Transparency Initiative (EITI) Secretariat. MoF and MoEn were the only Lead IPs that reported.

This Broad Activity has two specific activities namely:

- a) Explore the scope of the Common Global Reporting Framework for Oil and Gas sales transparency for collaboration with oil producing countries.
- b) Participate in the Inaugural Summit Meeting on Oil Sales Transparency as well as the EITI trading Transparency Working Group meeting.

Ministry of Energy (MoEn) and Ministry of Finance (MoF) reported on these activities.

##### **a. Explore the scope of the Common Global Reporting Framework for Oil and Gas sales transparency for collaboration with oil producing countries**

MoF and MoEn reported that the 2017/2018 GHEITI Oil and Gas Report was produced and the report would be launched on 11th March, 2020 and disseminated.

##### **b. Participate in the Inaugural Summit Meeting on Oil Sales Transparency as well as the EITI trading Transparency Working Group meetings**

MoEn reported that Ghana has further deepened transparency in the Oil and Gas Sectors with the launch of the first ever licensing Round by the President of the Republic of Ghana in 2018 for the award of Petroleum Blocks. Following the launch, six (6) oil blocks were demarcated for the Licensing Round. Sixteen (16) international oil and gas companies expressed interest in the blocks in a competitive bidding and direct negotiations process. After a pre-qualification evaluation, fourteen (14) companies were qualified and invited to bid for the blocks, but only three bids were received at the close of the tender proceedings (21st May, 2019). After evaluation of the tender documents, two bids were successful. Petroleum Agreement (PAs) negotiations are ongoing. When completed the PAs will be submitted to Cabinet and thereafter to Parliament for ratification in accordance with Article 268 (1) of the 1992 Constitution.

MoF reported that Ghana participated in the 8th EITI Global Conference organized by the EITI International Secretariat in Paris, France, in June 2019. The Board of EITI approved new standards to guide activities of the 52 implementing countries. It was attended by about thirty (30) participants from Ghana including the Vice President of Ghana. The EITI International Secretariat also engaged a Ghanaian Consultant from Ghana Oil and Gas Inclusive Growth (GOGIG) to provide technical support on Commodity Trading and beneficial ownership to GHEITI and other key institutions.

#### **v. Develop and implement Customer Service Charters in all MDAs, public and private sector Institutions**

Under this Broad Activity, the Lead IPs are (MDAs/ Public Institutions and Public Sector Reform Secretariat). The collaborating IPs are the Private sector and NGOs were required to report.

This Broad Activity has two Specific Activities namely:

- a) Adapt and implement Customer Service Charters in selected MDAs.
- b) Conduct training on generic Customer Service Charter for selected MDAs.

##### **a. Adapt and implement Customer Service Charters in selected MDAs**

CHRAJ reported that the World Bank had agreed with the Government to support the implementation of the Service Charters under the “National Public Sector Reform Strategy (NPSRS)” programme. CHRAJ plays the lead role in the implementation of sub-component 1.3: “Strengthening Grievance Redress and Complaints Handling for Administrative Services”. Under the programme, CHRAJ is partnering with MDAs to train key staff of the MDAs, and also raise awareness among the general public on the value of the Service Charters for efficient public service delivery.

The Ministry of Roads and Highways reported that it has reviewed the Service Charter for the Ministry and its Agencies to improve service delivery.

#### **vi. Ensure that MDAs and MMDAs prepare Financial Statements on time for audit**

Under this Broad Activity, the lead IPs (Public Services Commission, Office of the Head of Civil Service, and Ministry of Local Government and Rural Development. The collaborating IPs are MDAs, MMDAs and other Public institutions. The OHCS reported.

This Broad Activity has two Specific Activities namely;

- a) Issue notices to MDAs and MMDAs, at end of each financial year, to prepare financial statements in accordance with PFM Act, 2016 (Act 921).
- b) Sanction Heads of MDAs and MMDAs for not preparing financial statements on time for audit in accordance with Act 921.

Thirteen (13) IPs (12 MDAs and one OPSI) reported on these activities.

##### **a. Issue notices to MDAs and MMDAs, at end of each financial year, to prepare financial statements in accordance with PFM Act, 2016 (Act 921)**

OHCS reported that it directed heads of departments and training institutions to prepare and submit financial statements within required time frame. It indicated that Chief Directors are required to submit financial statements to the CAGD as part of key deliverables in the CDPA, Schedule 2 and KRA 2.

Bank of Ghana (BoG) reported that it issued notices to its departments and subsidiaries at the end of 2019 and received inputs for preparation of financial statements in accordance with International Financial Reporting Standards (IFRS) and in the manner required by the Bank of Ghana Act, 2002 (Act 612) [as amended by the Bank of Ghana (Amendment) Act, 2016 (Act 918)] as well as the Public Financial Management Act, 2016 (Act 921). The Audited Consolidated Financial Statement was to be ready by 31st March, 2020 as required by the Bank of Ghana Act.

The Ministry of Aviation, Ministry of Inner City and Zongo Development, Ministry of Lands and Natural Resources and Ministry of Defence indicated they prepared and submitted financial statements for the 2019 fiscal year in accordance with directives. The Ministry of Fisheries and Aquaculture Development and Ministry of Youth and Sports indicated they issued memos/letters to various Agencies/Directorate/Unit Heads to submit reports on the financial year.

The IAA reported that it completed its financial statement for the year 2019 and submitted it to the CAGD as required by law.

The Ministry of Planning and Ministry of Tourism, Arts and Culture indicated that they prepared and submitted their yearly financial statements to auditors during assessments, which was ongoing for year 2019. The Ministry of Works and Housing reported that it submitted four (4) quarterly Financial Statements to the Ministry of Finance and the Controller and Accountant General.

**b. Sanction Heads of MDAs and MMDAs for not preparing financial statements on time for audit in accordance with Act 921**

The Controller and Accountant General's Department (CAGD) indicated that MDAs and MMDAs who process transactions outside the GIFMIS were named and shamed at stakeholders meetings.

**vii. Establish and Strengthen Audit Committees (ACs) in all MDAs and MMDAs**

Under this Broad Activity, the Leads IPs required to report were IAA and MLGRD, whilst the collaborating IPs were MDAs and MMDAs. This Broad Activity has two Specific Activities namely:

- a) Establish Audit Committees in line with the Public Financial Management Act, 2016 (Act 921).
- b) Provide training for Audit Committees in the Public Sector.

The Internal Audit Agency (IAA) reported on these activities.

**a. Establish Audit Committees in line with the Public Financial Management Act, 2016 (Act 921)**

IAA reported that it facilitated the establishment and inauguration of additional 61 Audit Committees (ACs), bringing the total number of ACs established to 444, representing 85% of the expected. It also reported that the monitoring of 157 covered entities in Greater Accra revealed that 34 ACs were not functional and did not meet in 2019 to discharge their mandate.



## **b. Provide training for Audit Committees in the Public Sector**

IAA reported that it conducted trainings for 305 audit committee members from 61 Public Institutions. These trainings were done during the inauguration of the audit committees.

## **viii. Enact Law Setting Ceiling on Political Party Financing and Election Expenditures**

Under this Broad Activity, the Lead IPs required to report were Attorney General (AG), Parliament and Electoral Commission (EC), whilst the collaborating IPs were Political Parties and CHRAJ. AG was the only lead IP that reported. The Specific Activity under this Broad Activity is to *initiate processes on drafting a bill on setting ceiling on political party financing and election expenditures*.

The Attorney General (AG) reported that it had initiated the processes for the drafting of a law to set a ceiling on political party financing and election expenditure.

## **ix. Establish a Parliamentary Committee to follow up on PAC Recommendations on the AuG's Report**

Under this broad activity, the lead IP required to report was Parliament, whilst the collaborating IPs were Political Parties represented in Parliament and NDPC. NDPC and Parliament of Ghana were the IPs that reported.

The Specific Activity under this broad activity is to *Establish a Parliamentary Committee to follow- up on PAC recommendations on AuG Reports*. NDPC and Parliament both reported that the Committee to follow- up on Public Accounts Committee's recommendations has been established.

## **x. Enact a Law on Code of Conduct for Public Officers**

Under this Broad Activity, the leads IPs required to report were Office of the AG and Parliament, whilst the collaborating IPs were CHRAJ and AuG.

The Specific Activity under this Broad Activity was to *Enact Conduct for Public Officers Bill*.

Attorney General and Parliament reported that the Code of Conduct for Public Officers Bill is before Parliament for consideration.

## **xi. Create and operationalise Integrity/Ethics Committees within State institutions**

Under this Broad Activity, the lead IPs required to report were MDAs and MMDAs, whilst the collaborating IPs were PSC and CHRAJ.

This Broad Activity has three Specific Activities namely;



- a) Create and operationalise Integrity/Ethics Committees within State Institutions.
- b) Introduce Integrity tools for use by state institutions.
- c) Monitor performance of Ethics Desks/Committees in Public Sector institution.

**a. Create and operationalise Integrity/Ethics Committees within State Institutions**

CHRAJ trained 50 ethics officers drawn from various State insitutions.

**b. Introduce Integrity tools for use by State institutions**

CHRAJ reported that it developed and validated integrity compliance tools for MDAs and MMDAs (including Gifts Register and Disclosure Forms, and Code of Conduct Compliance Questionnaire) for monitoring implementation of Code of Conduct in the public services.

CHRAJ introduced tools for monitoring ethics desks/committees in MDAs.

**xii. Develop and Implement Public Service Integrity Programme**

Under this Broad Activity, the lead IP required to report is CHRAJ, with collaborating IPs being PSC, OHCS and Heads of MDAs. The Specific Activity under this Broad Activity was to *Monitor Compliance of the public sector with operationalisation of Ethics Committees*.

The Ministry of Works and Housing (MoWH) indicated it held a 2-day workshop to sensitise staff on Public Sector Integrity Programme (PSIP). It also printed and distributed the Code of Conduct of the Civil Service to staff of the Ministry.

CHRAJ developed Integrity Compliance Tools to monitor compliance of the code of conduct for public officers within public sector institutions. CHRAJ also conducted training programmes for ethics officers and management of a number of public sector institutions on the PSIPs and the code of conduct for public officers under Chapter 24 of the Constitution of Ghana.

**xiv. Enforce Conflict of Interest rules and Educate Public Officers on Conflict of Interest**

Under this Broad Activity, the lead IP required to report is CHRAJ, whilst the collaborating IPs are PSC, MDAs and MMDAs.

This Broad Activity has two Specific Activities namely;

- a) Enforce conflict of interest rules in selected MDAs.
- b) Organise educational programmes on conflict of interest for selected MDAs.

Seventeen (17) IPs (12 MMDAs, 3 MDAs and 2 OPSI) reported on these activities.

**a. Enforce conflict of interest rules in selected MDAs**

BoG indicated that it had established an Ethics and Internal Investigations Unit to strengthen good governance within the bank. CHRAJ MoEn, OHCS and Komenda-Edina-Eguafo Abrim

Municipal Assembly reported that they used the Civil Service Code to deal with issues relating to conflict of interest. The following District Assemblies: Abura/Asebu/Kwamankese District Assemblies, Ekumfi District Assembly, Sene East District Assembly, Shai-Osudoku District Assembly, Nkwanta South Municipal Assembly, Awutu Senya West District Assembly, and Gomoa West District Assembly indicated that conflict of interest rules were under strict enforcement with no issue of conflict of interest currently detected.

#### **b. Organise educational programmes on conflict of interest for selected MDAs**

CHRAJ indicated that it held 328 training sessions on NACAP implementation and the NACoRD, and anti-corruption in general for focal persons in MDAs and MMDAs. The training also touched on conflict of interest. Tain District Assembly reported that it organised an educational programme to train staff on how not to engage in conflicting activities while at work.

MWH reported it organized a 2-day workshop for Management and staff of the Ministry, its departments and agencies on conflict of interest issues as well as printed and distributed Code of Conduct for civil servants as a guide.

### **xv. Request Public Officers to Disclose Personal Interests, e.g. affiliations, upon taking up public appointment**

Under this Broad Activity, the lead IPs, PSC and MLGRD, in collaboration with MDAs and MMDAs were required to report. One of the lead IPs, PSC, reported.

The Specific Activity under this Broad Activity is to *develop a framework for public officers to disclose personal interest*.

Eleven (11) IPs (8 MMDAs, 2 MDAs and 1 OPSI) reported on this activity.

Abura/Asebu/Kwamankese District Assembly; Ekumfi District Assembly and Gomoa West District Assembly indicated that the Local Government Service (LGS) framework for disclosing personal interest was used. BoG indicated that its HR Policy has provisions on conflict of interest and the Ministry of Sanitation and Water Resources reported that Tender Review Committee members disclose their interest as and when contracts are advertised and evaluated.

The Public Service Commission reported that all the 429 category “A” and “B” office holders that were appointed or promoted in 2019 were given copies of the Assets Declaration Forms to fill out/in for onward submission to the Auditor General.

### **xvi. Strengthen the Capacity of MMDAs for Accountable and Effective Service Delivery at the District Level**

Under this Broad Activity, the lead IP required to report is MLGRD, whilst the collaborating are NALAG, CHRAJ, RCCs, CSOs and MMDAs. The lead IP did not report.

This Broad Activity has two Specific Activities namely;

- a) Organize training and sensitization programmes for Chief Executives, Finance Committees and Presiding Members of MMDAs.
- b) Sensitize District Assemblies on the New Local Governance Act, 2016 (Act 936).

Nineteen (19) MMDAs reported on this activity.

**a. Organize training and sensitization programmes for Chief Executives, Finance Committees and Presiding Members of MMDAs**

The Nineteen (19) IPs indicated that training workshops were organised for assembly members. The Volta Regional Coordinating Council (Volta-RCC) indicated it held two workshops; one was to provide supply driven capacity building support to participating MDAs and RCCs to improve on institutional performance and delivery of basic services. The other was for Heads of Internal Audit Unit in the Local Government Service to ensure prudent financial management. It also participated in a training of trainers' workshop for the verification of 2018 performance contracts of MMDAs.

The Adentan Municipal Assembly had two (2) Social Accountability Workshops and one (1) Social Auditing programme for members.

**b. Sensitize District Assemblies on the Local Governance Act, 2016 (Act 936)**

One hundred and twenty-five (125) Chief Executives, Presiding Members, Assembly Members and Finance Committee Members were trained by 11 reporting IPs. Twelve IPs further indicated that a sensitization workshop was organized for all their Assembly members.

Volta-RCC reported that the National Association of Local Authorities in Ghana (NALAG) in partnership with the Birmingham Leadership Development Training Centre organized a symposium for DCEs on Ethics, Government Integrity and Compliance for Public Sector Oversight leaders and Managers.

**xvii. Appoint Chief Executive Officers (CEOs) of State institutions through open, competitive and transparent processes**

Under this Broad Activity, the lead IPs required to report are OoP, PSC and OHCS, with the Ministry of Employment, Boards and Councils of State Institutions as collaborating IPs. The three lead IPs reported. The Specific Activity under this Broad Activity was to *recruit CEOs through open, competitive and transparent processes including advertising vacant positions.*

OHCS, PSC and OoP all reported that the processes of recruiting to senior Management positions were open, competitive and transparent. PSC in collaboration with OoP and OHCS made a total of 429 appointments, while category A and B office holders were promoted (53 Chief Executive Officers and Analogous, 35 Deputy Chief Executive Officers and Analogous, and 341 Directors and Analogous positions).

### **xviii. Create civic awareness to enable the public to demand accountability from public officials**

Under this Broad Activity, the lead IP required to report is NCCE, with CHRAJ and CSOs as collaborating IPs. This Broad Activity has two Specific Activities namely;

- a) Sensitize the public on accountability mechanisms.
- b) Undertake mapping of social accountability mechanisms.

NCCE, GACC and GII reported on the activities.

#### **a. Sensitize the public on accountability mechanisms**

NCCE reported it organised two national dialogues on Public Accountability and Abuse of Office in Accra, and another on “Environmental Governance” in Kumasi.

GACC indicated it sensitized the public on transparency and accountability using platforms such as radio, TV, social media and workshops. Over 70,800 people were reached using social media.

GII reported that it organised a series of sensitization and awareness programmes on anti-corruption for Faith Based Organisations in 40 districts within four (4) Regions (Volta, Western, Ashanti and Northern). The engagements were aimed at building capacity of citizens to Speak Up, Resist and Report Corruption. GII in collaboration with the Regional Lands Commission Offices in the Western, Eastern, Ashanti, Brong Ahafo, Northern and Upper East Regions of Ghana organized community sensitization and awareness programmes for residents of Whindo, Asokore, Daaporee and New Daamang. 650 community members benefited from the Community Mobile Land Clinic, whereas 939 participants comprising 742 males and 197 females benefited from sensitization workshops. In addition, 4874 (1371 males and 3503 females) were reached through durbars and were educated on their human rights and freedoms. GII also collaborated with NCCE and CHRAJ to organise 31 mobile ALACs in 31 Districts across the country with 4,924 (3,533 females and 1,391 males) citizens benefiting directly.

The ADISS Consortium provided the Citizen Groups (CGs)/Anti-Corruption Champions (ACCs) with support to continue their public education activities at the district level using various platforms including social group gatherings, radio and information centers. The public education centered on areas including manifestations of corruption, citizens' role in holding public officers accountable and fighting corruption through available reporting mechanisms (including ALAC) at the district level. Eight thousand eight hundred and fifteen comprising 3,763 males and 5,052 females were sensitized through face to face interventions, while an estimated 75,000 citizens were also sensitized via radio programmes.

#### **b. Undertake mapping of social accountability mechanisms**

NCCE reported that it carried out Social Auditing Engagements in 260 Districts under the theme “Citizens for Transparency and Accountability”.

GACC reported that it trained and provided technical support to Local Accountability Networks (LANets) made up of citizens and civil society groups to independently monitor projects using relevant social accountability tools.

GII reported that it had 31 citizens groups called Social Auditing Clubs across the hitherto 10 Regions whose aim was to empower citizens to monitor local development projects and service delivery in various Districts and communities in Ghana, as well as ensure grassroots participation in local governance discourse.

GII also collaborated with NCCE Civic Education Clubs (CECs) in four (4) tertiary institutions to engage in anti-corruption initiatives, including financially supporting the four CECs to execute action plans on quarterly basis. Furthermore, GII launched an Integrity School Programme, under which inter-tertiary school debate was held for three tertiary institutions (University of Ghana, University of Professional Studies, and University of Education, Winneba).

#### **xix. Strengthen GACC and widen its membership to include Human Rights Organizations**

Under this Broad Activity, the lead IP, GACC, in collaboration with CHRAJ, Network of Human Rights NGOs and CSOs were required to report. The lead IP, GACC, reported. This Broad Activity has two Specific Activities namely:

- a) Develop new strategic plan to guide the operations of GACC for the next five years.
- b) Develop protocols to admit new members including Human Rights Organisations.

##### **a. Develop new strategic plan to guide the operations of GACC for the next five years**

GACC reported that it had developed and launched its new strategic plan spanning 5 years (2010-2024). This Strategic plan seeks to ensure GACC achieves its objectives in eradicating corruption and building a vibrant, robust and self-sustaining Coalition by 2024.

##### **b. Develop protocols to admit new members including Human Rights Organisations**

GACC pointed out that appropriate protocol had been put in place to ensure other institutions or organizations join the Coalition. Currently, membership has increased from eight to thirteen. New members include: Commonwealth Human Rights Initiative (CHRI), Ghana Audit Service (GAS), NCCE, Public Procurement Authority (PPA) and Good Governance Africa (GGA).

#### **xx. Develop and implement public assets management system**

Under this Broad Activity, the lead IPs, Ministry of Finance (MOF) and Auditor General (AuG), in collaboration with MDAs and MMDAs were required to report. MoF is the only lead IP that reported. The Specific Activity under this Broad Activity was to *engage stakeholders in consultations on developing a Public assets management system*.

Sixteen (16) IPs (9 MMDAs and 7 MDAs) reported on this activity.

The Ministry of Finance (MoF) indicated that it was at the concept development stage and in the preparation of the Bill on the Public Assets Management System (GAMCORP Bill). Extensive consultations were held with sector Ministries, the Economic Management Team, SOEs, other government institutions, civil society and the academia.

The Jirapa Municipal Assembly reported that there had been two (2) asset management meetings held. Shai Osudoku District Assembly had two (2) Consultative engagements at an Audit Committee meeting and at management level. CAGD also indicated that it had a Fixed Assets Guidelines and Policy Manual in place.

## 4.4. Implementation of Strategic Objective 3

Strategic objective 3 seeks to engage individuals, media and civil society organisations in reporting and combating corruption. Under this Strategic Objective, there are 14 Broad Activities which are divided into 16 Specific Activities for implementation. (See table 7).

Table 7: Activities and Indicators under Strategic Objective Three

STRATEGIC OBJECTIVE 3			
S/N	Broad Activity	Specific Activity	Indicator
1	1. Educate Media Practitioners and NGOs on anti-corruption methods, practices and challenges of fighting corruption	Engage editors' forum and selected media practitioners on NACAP and corruption	Editors - Media practitioners ratio
		Engage editors' forum and selected media practitioners on NACAP and corruption	Proportion of Editors engaged in anti-corruption programmes to total number of media practitioners
2	4. Develop Whistle Blowing & other reporting mechanism (e.g. complaints and suggestion boxes, hotlines)	Set up hotlines, web based platforms, complaint boxes and other(s) for reporting impropriety	No. of hotlines/web based platforms set up as a proportion of total no. of implementing partners
3	5. Undertake awareness-raising programmes for the public on whistle-blowing	Develop anti-corruption materials for use by multimedia channels	Number of anti-corruption materials used by multi-media channels as a proportion of total number of materials
		Organize TV & Radio discussions on Whistle-blowing	Number of discussions on whistle-blowing as a proportion of total number of TV & Radio discussions



STRATEGIC OBJECTIVE 3			
S/N	Broad Activity	Specific Activity	Indicator
4	6. Create a confidential system for citizens to report cases of corruption and provide legal advice to victims of corruption	Institute confidential reporting systems including toll-free lines and portals for citizens to report cases of corruption and provide legal advice to victims of corruption	Confidential reporting systems (CRS)
		Assign dedicated persons to manage the confidential reporting systems	Assigned Officers – CRS ratio
5	7. Enact the Right to Information Law	Enact the Right to Information Law	Right to Information Act
6	8. Educate and sensitize Public and Civil Servants, Media, Civil Society and general public on the Right to Information Law	Organise sensitization and awareness programmes for Public and Civil Servants, Media, Civil Society, and the general public on the Right to Information Law	Level of awareness of Right to Information Act
7	13. Increase the allocation of resources to audit agencies	Track the allocation and release of funds to Audit Agencies	Percentage of audit agencies budget releases to total national budget
8	15. Formulate and implement a National Policy on NGO programmes	Formulate National Policy on NGOs programmes	National NGOs Policy
9	16. Strengthen Institutional and operational capacity of Civil Society Organizations in monitoring and evaluating public revenue and expenditure and physical projects	Organize capacity building programmes for CSOs on monitoring & evaluating Public Financial Management (PFM) and Physical Projects (PPs)	Number of PFM / PPs training programmes
<b>Total</b>	<b>9</b>	<b>12</b>	<b>12</b>

Twenty two (22) Implementing Partners (14 MDAs, 3 OPSIs, 3 CSOs, OoP and Parliament) reported on 9 Broad Activities and 9 Specific Activities under Strategic Objective 3.

#### **i. Educate media practitioners and NGOs on anti-corruption methods, practices and challenges of fighting corruption**

Under this Broad Activity, the lead IPs required to report are GJA and the National Media Commission (NMC) with CHRAJ and EOCO as collaborating IPs. The Specific Activity under this Broad Activity was *to engage editors' forum and selected media practitioners on NACAP and corruption*.

EOCO reported that it engaged selected media establishments including, Ghana Broadcasting Corporation (GTV), and Atlantis Radio on its mandate in the fight against corruption.

## ii. Develop whistleblowing and other reporting mechanisms (eg. complaints and suggestion boxes, hotlines)

Under this Broad Activity, the lead IPs required to report were CHRAJ, Ghana Police Service, NACOB, BNI and GRA. The collaborating IPs were the PSC, OHCS, Heads of MDAs, PEF, Private sector organisations. The Specific Activity under this Broad activity was to *Set up hotlines, web based platforms, complaint boxes and other(s) for reporting impropriety.*

Twelve IPs (10 MDAs and 2 OPSIs) reported that they had put in place whistleblowing and other reporting mechanisms. Some of the mechanisms employed by the IPs were; online (websites and social media), use of suggestion and complaint boxes, call centres. Details of IPs specific reporting mechanism are provided in the table 8.

Table 8: Whistle Blowing and other Reporting Mechanisms Developed

S/N	IPs	Reporting Mechanism Developed
1	CHRAJ	<ul style="list-style-type: none"> <li>A web based platform, and secure Internet Protocol (IP) developed</li> <li>Desk phones in place for receiving and processing of Whistle-blower disclosures</li> </ul>
2	EOCO	<ul style="list-style-type: none"> <li>Online (Website): <a href="http://www.eoco.org.gh">www.eoco.org.gh</a></li> <li>Hotline &amp; Call centre's number:0302634363</li> <li>Eight (8) Suggestion and Complaint boxes in place</li> </ul>
3	Ministry of Energy	<ul style="list-style-type: none"> <li>Complaint Box in place</li> </ul>
4	BOG	<ul style="list-style-type: none"> <li>An environment where employees can report suspicious activities without fear of victimization</li> </ul>
5	MoGCSP	<ul style="list-style-type: none"> <li>"Help Line of Hope Call Center" was being operationalised</li> </ul>
6	Ministry of Planning	<ul style="list-style-type: none"> <li>Client Service Charter</li> </ul>
7	Ministry of Works and Housing	<ul style="list-style-type: none"> <li>Suggestion Box had been installed at the reception</li> <li>Ethics Committee established to deal with reported cases</li> </ul>
8	Ministry of Youth and Sports	<ul style="list-style-type: none"> <li>Details in Ministry's service charter</li> </ul>
9	OHCS	<ul style="list-style-type: none"> <li>OHCS website and Social Media Platforms were available to the Public on Facebook</li> </ul>
10	NPRA	<ul style="list-style-type: none"> <li>Toll free line (00800766000)</li> </ul>

## iii. Undertake Awareness-raising Programmes for the Public on Whistle-Blowing

Under this Broad Activity, the lead IPs required to report were the NCCE and CHRAJ. The collaborating IPs were the GII, CDD, IDEG, ISODEC, CEPIL, LRC, Civil Society, AG. This Broad Activity has two Specific Activities namely:

- Develop materials for use by multimedia channels.
- Organize TV & Radio discussions on Whistle-blowing.



**a. Develop materials for use by multimedia channels**

CHRAJ reported that it reprinted copies of the abridged version of the NACAP document, and leaflets on the “ABC of Corruption” for dissemination and use by multimedia channels. CHRAJ further produced five (5) audio visuals on the cost of corruption for dissemination during the ACT Week programme in December 2019.

**b. Organize TV & Radio discussions on Whistle-blowing**

CHRAJ, GII and NCCE reported on this activity. CHRAJ mentioned that it used GBCs Breakfast Show to raise public awareness about the ACT Week activities, Anti-Corruption Day celebrations and NACAP implementation. This broadcast had/attained a nation-wide viewership, listenership, and online audience.

GII reported that it collaborated with NCCE and CHRAJ to organize whistle-blower awareness and sensitisation activities in eight (8) MMDAs in selected Districts in the northern sector. It also mentioned that ADISS Consortium provided the Citizen Groups (CGs)/Anti-Corruption Champions (ACCs) with support to continue their public education activities which were centered on the manifestations of corruption, legislative frameworks (RTI, Whistleblowers Act, etc.) citizens role in holding public officers accountable and fighting corruption through available reporting mechanisms (including ALAC) at the District level. A total of 8,815 citizens were sensitized through face to face interventions, while an estimated 75,000 citizens were also sensitized via radio programmes.

The National Commission for Civic Education (NCCE) held National dialogues on ‘Whistle Blowing’ mechanisms. The programme was to engage, educate and sensitise the populace to report cases of corruption. 200 participants from MDAs, the media, FBOs, traditional authorities, as well as women and youth groups, and representatives of development partners benefited from the event. A total of 1,794 Radio discussions were organized in all Regions and Districts.

The Office of the Attorney-General and Ministry of Justice organised a one day sensitization workshop on the Whistleblower Act, 2006 (Act 720) and Procurement Standard Clause to strengthen the capacity of anti-corruption advocates, government officials, CSOs and the private sector.

**iv. Create a Confidential System for Citizens to Report cases of Corruption and Provide Legal Advice to Victims of Corruption**

Under this Broad Activity, the lead IPs required to report were CHRAJ, EOCO, A-G, Police, BNI, IAA, AuG, OoP, and NACOB. The collaborating IPs were Legal Aid Board, GACC and CSOs.

Four of the lead IPs failed to report on this activity. This Broad Activity had two Specific Activities namely:

- a) Institute confidential reporting systems including toll-free lines and portals for citizens to report cases of corruption and provide legal advice to victims of corruption.
- b) Assign dedicated persons to manage the confidential reporting systems.

**a. Institute Confidential Reporting Systems including toll-free lines and portals for citizens to report cases of corruption and provide legal advice to victims of corruption**

Seven (7) IPs (3MDAs, 2 CSOs, 1 OPSI and OoP) reported having created confidential systems to report cases of corruption. These seven IPs were AG, EOCO, OoP, GPS, GACC, CHRAJ, and GII.

The GII reported that its Advocacy and Legal Advice Centre (ALAC) continued to offer a CSO platform for citizens to report corruption anonymously. The ALAC recorded a total of 170 new complaints out of which 94 were related to some form of corruption. Action had been taken on all complaints received (49 were referred to anti-corruption institutions, 16 received legal advice, while 29 were closed).

**b. Assign dedicated persons to manage the Confidential Reporting Systems**

Five (5) IPs (2 MDAs, 2 CSOs and 1OPSI) stated that they had assigned dedicated Staff to manage their confidential reporting systems.

Table 9: Confidential reporting systems, 2019

S/No	Institutions	Confidential Reporting System Available	Dedicated Staff/ Unit Assigned	Reporting Mechanism/System			
				Online	Phone	Complaint Box/ Postage	Reporting Desk/Units
1	AG	Yes	1 Staff	ü			
2	CHRAJ	Yes	3 Staff	ü	ü		ü
3	EOCO	Yes	Complaints Unit	ü	ü	ü	ü
4	GII	Yes	1 Staff	ü	ü	ü	ü
5	GACC	Yes	1 Staff	ü	ü	ü	ü
6	OoP	Yes	N/A				
7	Ghana Police	Yes	N/A				
<b>Total</b>				<b>5</b>	<b>4</b>	<b>3</b>	<b>4</b>



Table 9 shows that the most common confidential reporting system used by the IPs was the online system followed by the phone system and Desk/Unit. Complaints Box/Postage was the least reporting mechanism used.

**v. Enact the Right to Information Law**

Under this Broad activity, the office of the A-G and the Parliament of Ghana were the lead IPs required to report. The collaborating IPs required to report were Legal Aid Board, GACC, and CSOs. The Specific Activity under this Broad Activity was to *enact the Right to Information Law*.

The Office of the A-G and Parliament reported that the Right to Information Act, 2019 (Act 989) was enacted by the Parliament of Ghana and received Presidential Assent on 21<sup>st</sup> May, 2019.

## **vi. Educate and Sensitize Public and Civil Servants, Media, Civil Society and General Public on the Right to Information Law**

Under this Broad Activity, the Ministry of Communication and the National Commission for Civic Education were the Lead IPs required to report. CHRAJ, Institute of LG Studies, MLG, NGOs, CBOs, CSOs, and Media were the collaborating IPs. The Specific Activity under this Broad Activity was to *organise sensitization and awareness programmes for Public and Civil Servants, Media, Civil Society, and the general public on the Right to Information Law.*

The MOI, GII and Alliance for Integrity reported on this activity. The MOI reported having organized two sensitization programmes for Chief Directors of MDAs and Regional Coordinating Directors on the Right to Information Law.

GII Consortium (GII, GACC and SEND Ghana) had provided Citizen Groups (CGs)/Anti-Corruption Champions (ACCs) with support to continue their public education campaigns drive towards the passage of the Right to Information Bill at the District level using various platforms including social group gatherings, radio and information centers. A total of 8,815 citizens had been sensitized through face to face interventions, while an estimated 75,000 citizens were also sensitized via radio programmes.

## **vii. Increase allocation of resources to audit agencies**

Under this Broad Activity, the lead IP required to report was the Ministry of Finance. The collaborating IPs were the Parliament of Ghana and the OoP.

The specific activity under this broad activity is to *track the allocation and release of funds to Audit Agencies.*

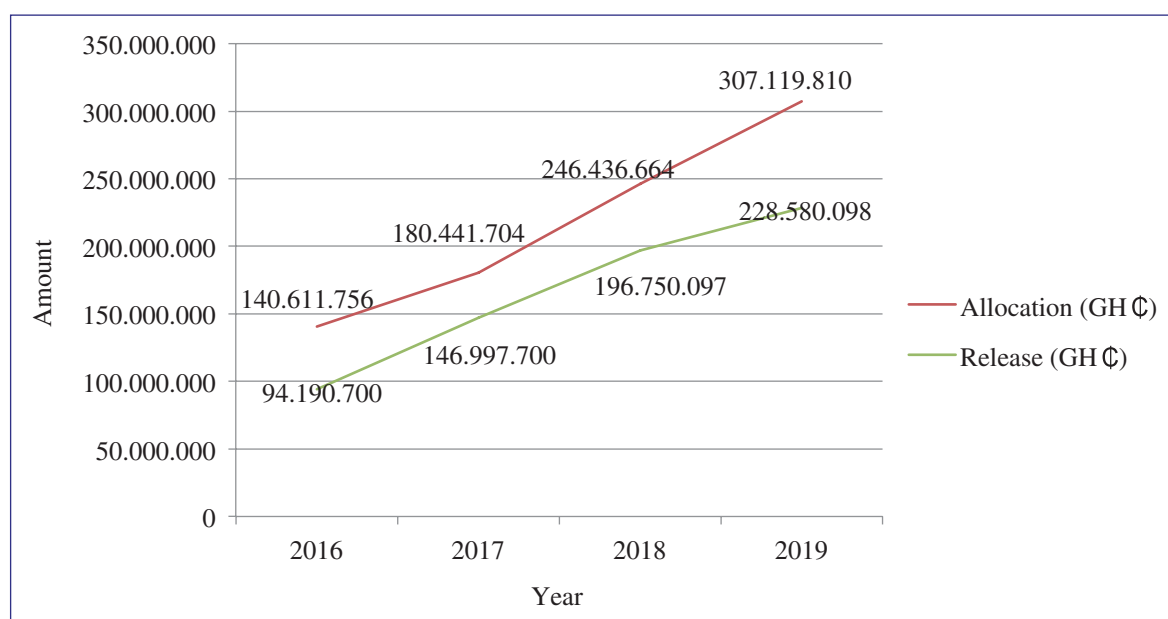
The Ministry of Finance reported that over the years, it had increased the budgetary allocation to audit agencies. Parliament of Ghana confirmed that there was an increase in allocation in 2019. Release to the Audit Service has increased over the four-year period, 2016 to 2019. The total release for 2019 was more than double the 2016 release, but was still 25.6 percent less than the allocation for the year. The appropriation for Audit Service was GH¢ 307,119,810. Out of this, an amount of GH¢228,580,098 was released. Table 7 shows allocations to the Audit service since 2016.

Table 10: Budgetary Allocation &amp; Releases to Audit Service

IP/Year	Allocation (GH¢)	Release (GH¢)	% Difference relative to Previous Year	% Difference relative to 2016 Base Year
2016	140,611,756	94,190,700	-	-
2017	180,441,704	146,997,700	28	28
2018	246,436,664	196,750,097	37	75
2019	307,119,810	228,580,098	25	118

The Table shows the change in Allocations and Releases as well as percentage change relative to the previous years; 2018, 2017 and 2016.

Figure 4: Allocations &amp; Releases to Audit Service since 2016



The graph above shows a steady increase in Allocations as well as Releases to the Audit service since 2016.

#### viii. Formulate and Implement a National Policy on NGO Programmes

Under this Broad Activity, NGOs were the lead IPs required to report whereas DSW was the only collaborating IP required to report. NGOs who were the Lead IPs failed to report on this activity. The Specific Activity under this Broad Activity was *to Formulate a National Policy on NGOs programmes*.

The Department of Social Welfare (DSW) under the Ministry of Gender, Children and Social Protection (MoGCSP) reported on this activity. The DSW reported that it had developed a

work-plan to review the National Policy on NGOs programmes. The MoGCSP reported that, the policy and a bill had been drafted and consultations were underway to firm them up.

#### **ix. Strengthen Institutional and Operational Capacity, of CSOs to Monitor and Evaluate Public Revenue and Expenditure and Physical Project**

Under this Broad Activity, CSOs and GACC were the lead IPs required to report. The collaborating Partners were DSW, MoF and GRA.

The Specific Activity under this Broad Activity was to *organize capacity building programmes for CSOs on monitoring & evaluating Public Financial Management and Physical Projects*.

GACC and GII submitted reports on the implementation of this activity. GACC reported that, three (3) training programmes on procurement, open contracting, and tools to monitor public service delivery had been organized for 278 stakeholders. GII also reported organizing refresher training for forty-five (45) Citizen Groups from 15 Districts for bilateral dialogues on the state of the Audit Committees.

## **4.5. Implementation of Strategic Objective 4**

Under the Strategic Objective 4, Implementing Partners (IPs) were required to conduct effective investigations and prosecutions of corrupt conduct. In all, 17 out of the 20 Broad Activities, 24 out of the 34 Specific Activities, and 22 out of 34 indicators were reported on under this Strategic Objective. (See table 11).

Table 11: Activities and Indicators under Strategic Objective Four

STRATEGIC OBJECTIVE 4			
S/N	Broad Activity	Specific Activity	Indicator
1	1. Ratify and domesticate international conventions relating to corruption, money laundering and transnational organized crime	Facilitate the review of UNCAC by Ghana (2nd cycle)	Ghana reviewed on the UNCAC 2nd cycle review (i.e. prevention and asset recovery)
		Implement Companies (Amendment) Act 2016 on beneficial ownership.	Companies Act implemented
		Implement recommendations of UNCAC 1st Cycle Review	Number of recommendations of the 1st cycle UNCAC review implemented
		Implement the recommendations of the Anti-Money Laundering National Risk Assessment Report	Number of recommendations implemented
		Initiate processes towards the assessment of SDG 16.5	Processes on SDG 16.5 initiated

STRATEGIC OBJECTIVE 4			
S/N	Broad Activity	Specific Activity	Indicator
1	1. Ratify and domesticate international conventions relating to corruption, money laundering and transnational organized crime	Participate in international cooperation and related meetings on the Anti-Money Laundering, illicit financing and countering the financing of terrorism	Number of international cooperation and related meetings participated in
		Participate in IRG Session and meetings of subsidiary groups on UNCAC	Participate in IRG Session and meetings of subsidiary groups on UNCAC
2	3. Enforce Anti-Corruption laws impartially, regardless of position or status of parties involved	Report corruption cases	Number of corruption complaints received
3	4. Enact Witness Protection Legislation	Enact Witness Protection Legislation	Witness Protection Legislation enacted
4	5. Enforce the implementation of the Financial Management Laws and Regulations	Create awareness on the Public Financial Management Act 2016 (Act 921)	Number of awareness programmes organized on the Act
5	6. Acquire communication and information technology equipment to support investigations	Acquire communication and information technology equipment to support investigations	Number and type of communication and information equipment acquired
6	7. Provide and furnish office accommodation for Anti-Corruption Agencies	Make adequate budgetary provision to furnish office accommodation for Anti-Corruption Agencies in the 2019 budget	Number of ACAs allocated adequate funds in their 2019 Budget
7	8. Recruit Prosecutors for A-G's Office	Recruit and train Prosecutors for A-G's Office	Number of Prosecutors recruited and trained
8	9. Build the capacity of EOCO and FIC to undertake intelligence gathering work	Train at least 50 officers in intelligence work	Number of officers trained in intelligence work
9	10. Operationalise and widen the outreach of EOCO country wide	Establish EOCO offices in the districts	Number of offices of EOCO established
10	11. Train officers of the EOCO and law enforcement agencies in basic investigation techniques, basic drug law enforcement, basic intelligence, asset tracing, money laundering	Train officers in basic investigation techniques, basic drug law enforcement, basic intelligence, asset tracing, money laundering	Number of officers trained
11	12. Strengthen A-G's Department to facilitate speedy prosecution of corruption cases	Train 80 prosecutors.	Number of prosecutors trained.
		Provide logistics for prosecutors	Number and type of logistics provided

STRATEGIC OBJECTIVE 4			
S/N	Broad Activity	Specific Activity	Indicator
12	15. Build capacity of Anti-Corruption Institutions to perform their respective mandates and functions	Procure modern investigations equipment and tools to support investigations	Modern equipment procured
		Train officers on the use of the modern equipment and tools used in investigations	Number of officers trained
		Procure vehicles and other logistics	Vehicles and logistics procured
		Fill vacancies created in Anti-Corruption Institutions	Number of vacancies filled
13	17. Strengthen Collaboration among Anti-Corruption Agencies (ACAs)	Convene quarterly meetings of ACAs	Quarterly meetings convened
		Finalize and execute MOUs for implementation	MOUs finalized and executed
14	20. Review challenges in the implementation of Whistleblower Act	Enact the Whistleblower Amendment Bill	Whistleblower Amendment Bill enacted
15	24. Strengthen the use of IT in intelligence and investigations	Procure modern equipment and tools used in intelligence and investigations	Modern equipment and tools procured
		Train officers on the use of the modern equipment and tools used in intelligence and investigations	Number of officers trained
16	25. Build Capacity of Anti-Corruption Institutions in asset tracing and recovery	Train Anti-Corruption Institutions on asset tracing and recovery	Number of staff trained
		Undertake exchange programmes on Asset Recovery with partners and networks	Number of Exchange programmes undertaken
17	34. Establish social movement and conduct social marketing campaigns to boost public support for the work of Anti-Corruption Agencies	Conduct social marketing campaigns to boost public trust and support for the work of Anti-Corruption Agencies to other regions	Social marketing campaigns conducted
		Expand social movement	Social movement and social marketing campaigns expanded
<b>Total</b>	<b>17</b>	<b>31</b>	<b>31</b>

Sixty two (62) IPs comprising 27 MMDAs, 28 MDAs, 3 CSOs, 3 OPSI and 1 Private Sector submitted reports on the activities implemented under this strategic objective.



### **i. Ratify and domesticate International Conventions relating to corruption, Money Laundering and Transnational Organized Crime**

This Broad Activity had three (3) lead IPs (Attorney-General, Ministry of Foreign Affairs, Parliament of Ghana), and four (4) collaborating agencies (FIC, EOCO, Police, BNI). The Seven Specific Activities listed below were to be undertaken under this broad activity:

- a) Facilitate the review of UNCAC by Ghana (2nd cycle);
- b) Implement Companies (Amendment) Act 2016 on beneficial ownership;
- c) Implement recommendations of UNCAC 1ST Cycle Review;
- d) Implement the recommendations of the Anti-Money Laundering National Risk Assessment Report;
- e) Initiate processes towards the assessment of SDG 16.5;
- f) Participate in international cooperation and related meetings on the anti-money laundering, illicit financing and countering the financing of terrorism; and
- g) Participate in IRG Session and meetings of subsidiary groups on UNCAC.

#### **a. Facilitate the review of UNCAC by Ghana (2nd cycle)**

Ghana participated in the UNCAC 2nd cycle review on prevention and asset recovery. Ghana had gone through all the processes of being reviewed on the UNCAC 2<sup>nd</sup> cycle review (i.e. prevention and asset recovery) and is currently awaiting the final report on its review.

Ghana participated in the review and implementation of chapters II and IV of the UNCAC on Algeria, and finalized the full report of the review of Indonesia within the period. CHRAJ also hosted two officials of UNODC and five experts from Madagascar and South Sudan to initiate constructive dialogue regarding Ghana's review of implementation of the UNCAC in relation to the chapters 2 (Preventive Measures) and 5 (Asset Recovery) of the UNCAC.

#### **b. Implement Companies (Amendment) Act 2016 on beneficial ownership**

The Registrar-General's Department sensitized the general public on the new Companies Act on beneficial ownership. The new Companies Act, 2019 (Act 992) established the Office of the Registrar of Companies.

Ghana Integrity Initiative (GII) finalized a cross-country study on Beneficial Ownership capturing Ghana, Nigeria and Kenya. This study built on an initial one conducted by Transparency International (T.I.) on other countries. Additionally, GII produced an ABC Guide on Beneficial Ownership. The document was to serve as an easy way to understand reference material to increase the capacity of CSOs and the media to appreciate how to use Beneficial Ownership to advocate for increased transparency and accountability

#### **c. Implement recommendations of UNCAC 1st Cycle Review**

The Office of the Attorney-General amended some of the sections on corruption, and extraditions. CHRAJ submitted the UNCAC 1st Cycle Review report to the AG's office on the road map for implementation.



**d. Implement the recommendations of the Anti-Money Laundering National Risk Assessment Report**

The AG implemented two (2) out of the six (6) broad areas of recommendations for implementations on National Risk Assessment. They were to enhance the capacity of law enforcement agencies to detect terrorism financing related activities, and ensure there is a framework in order to systematically pursue paralyzes financing investigation on terrorism.

**e. Initiate processes towards the assessment of SDG 16.5**

The Office of the President conducted a baseline survey nationwide on the assessment of SDG 16.5.

GII conducted Corruption Risk Assessment (CRA) in the implementation of SDGs 3, 4 & 16. The output of this assessment was intended for policy engagements and advocacy within the project of creating anti-corruption voices in the implementation on the selected SDGs.

**f. Participate in international cooperation and related meetings on the Anti-Money Laundering, illicit financing and countering the financing of terrorism**

The Office of A-G participated in two international co-operations and related meetings on anti-money laundering, illicit financing and countering the financing of terrorism.

Ten (10) officers from EOCO partook in Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) conferences. Two officers are currently Assessors on GIABA.

**g. Participate in IRG Session and meetings of subsidiary groups on UNCAC**

Ghana made valuable inputs in the UNCAC country assessment on asset recovery, money laundering and other transnational organized crimes such as illicit financial flows and cyber security.

Ghana participated in three separate international meetings of UNCAC related bodies - Implementing Review Group (IRG), Inter-governmental Working Groups on Prevention, and Assets Recovery and Technical Assistance meetings held in Vienna, Austria. Ghana also participated in the Conference of State Parties (CoSP) to the UNCAC held in Abu-Dhabi.

**ii. Enforce Anti-Corruption laws impartially, regardless of position or status of parties involved**

This Broad Activity had 5 lead IPs (EOCO, CHRAJ, BNI, Police, NACOB), and the Judicial Service of Ghana as collaborating agency. The Specific Activity was to report corruption cases.

CHRAJ reported having received sixty-six (66) cases on corruption and breaches of the Code of Conduct of Public Officers under the 1992 Constitution, and investigating and disposing of Thirty-six (36) of them.

The National Vocational Training Institute (NVTI) reported that it received and investigated one corruption related complaint after which it sanctioned the culprit by way of reassignment.

### **iii. Enact Witness Protection Law**

This Broad Activity had two lead IPs (AG and Parliament of Ghana). Other anti-corruption groups were the collaborating agencies.

The Office of AG reported that, the Witness Protection Bill has been passed into law and received presidential assent.

### **iv. Enforce the implementation of the Financial Management Laws and Regulations**

This Broad Activity had four lead IPs (PPA, EOCO, MDAs, MMDAs) and two collaborating agencies (CSOs, AG). The specific activity under this broad activity is to *create awareness on the Public Financial Management Act, 2016 (Act 921)*.

A total of 26 IPs made up of 9 MDAs, 17 MMDAs, and 1 CSO, organized a series of training and sensitization programmes to bring participants up to speed on the Public Financial Management Act 2016 (Act 921), and to uphold the provisions therein. The following are activities undertaken by some IPs:

- The Nantumba District Assembly held a training workshop for some key staff of the Assembly on the PFM Act.
- The Adentan Municipal Assembly put together a sensitization programme for staff of the Assembly on the PFM Act.
- Some members of staff including the Finance Officer, the Internal Auditor, the Municipal Coordinating Director and Budget Officer of the Komenda-Edina-Eguafo Abrim Municipal Assembly were trained on the PFM at the 2019 Audit Conference.
- The Ministry of Finance held 17 workshops at the national and sub-national level.
- Management of the Ministry of Fisheries and Aquaculture organized two workshops on Public Financial Management ACT 2016(Act 2016).
- The Jirapa Municipal Assembly benefitted from a sensitization workshop organized by the MoF.
- Staff of the Sene East District Assembly partook in two workshops on the PFM Act organised by MoF and OHLGS.
- Management of the Ministry of Gender, Children, and Social Protection were trained on PFM in Sogakope as part of the Annual Progress Review.
- The leadership of the Gomaa West District Assembly used periodic meetings at the Assembly to create awareness on the PFM Act.
- In enforcing this activity, the Ministry of Sanitation and Water Resource ensured that all vouchers and cheques were processed through the GIFMIS system.
- The Office of the Head of Civil Service conducted sensitization workshop on the Public Financial Management Act and its regulations.

- The Awutu Senya West District Assembly organized a workshop on the PFM Act for key staff of the Assembly.
- There was a joint programme on the PFM Act between the Shai-Osudoku District Assembly and an NGO (FOSDA) on 31st May, 2019.
- The Nkwanta-South Municipal Assembly trained senior staff of the Assembly on the PFM Act.
- The Ghana Integrity Initiative (GII) reported that GII Consortium (GII, GACC and SEND Ghana) organized a refresher training for Citizen Groups for bilateral dialogues on the state of Audit Report Recommendation Implementation. The forty-five (45) trainees comprised thirty (30) males and fifteen (15) females drawn from fifteen (15) districts, with three (3) members per district.
- The CAGD undertook a nationwide training programme on the PFM Act for about 1,300 accounting officers across the country from 2nd July to 5th December 2019.

#### **v. Acquire communication and information technology equipment to support investigations**

This Broad Activity had four lead IPs (EOCO, CHRAJ, FIC, BNI), and Ministry of Finance as the collaborating agency.

EOCO acquired a wide range of communication and information technology equipment including 20 computers, 20 printers, and GOTA phones from the National Security and the Federal Bureau of Investigations (FBI) in the United States to support its investigations.

CHRAJ procured 22 Dell Desktop computers, 12 HP printers, One (1) Dell Server and 22 Mercury UPS. CHRAJ received the following items with support from EU-ARAP to facilitate its operations:

- 5 IP Desk Phones.
- One (Eleven (11) Mercury UPS.
- Ten (10) HP Printers.
- One (1) B/W Canon Photocopier.
- Five (5) D-link Network switches.
- Five (5) D-link Network Routers and 1 Dell Server.
- 10 Dell Desktop computers.

CHRAJ also received Ten (10) HP Desktop PCs and four (4) Lenovo laptops from GIFEC.

#### **vi. Provide and furnish office accommodation for Anti-Corruption Agencies**

This Broad Activity had the lead IP to be the Ministry of Finance (MoF) whereas CHRAJ and EOCO were the collaborating agencies. The specific activity was to *make adequate budgetary provision to furnish office accommodation for Anti-Corruption Agencies in the 2019 budget.*

Ministry of Finance reported the following releases to the following accountability institutions:

- CHRAJ received GH¢ 26,795,481 out of a revised budget amount of GH¢ 30,225,742.
- FIC received GH¢ 4,358,854 out of a revised budget amount of GH¢ 4,808,475.
- Audit Service received GH¢ 228,580,098 out of a revised budget amount of GH¢ 307,119,810.
- Judicial Service received GH¢ 228,035,049 out of a revised budget amount of GH¢ 325,568,796.
- Parliament of Ghana received GH¢ 320,571,833 out of a revised budget amount of GH¢ 353,192,717.

#### **vii. Recruit Prosecutors for A-G's Office**

Under this Broad Activity the Attorney-General and Minister for Justice was the lead IP while OoP, MoF, PSC, OHCS constitute the collaborating IPs. The Specific Activity under this Broad Activity was to *recruit and train Prosecutors for A-G's Office*.

The Office of the A-G recruited ten (10) State Attorneys out of which five (5) were assigned to the Prosecution Divisions.

#### **viii. Build the capacity of EOCO and FIC to undertake intelligence gathering work**

This Broad Activity had four (EOCO, FIC, BNI, NACOB) lead IPs whereas the collaborating IPs were A-G, National Security, MMDAs, and MDAs. The Specific Activity was to *train at least 50 officers in intelligence work*.

Over twenty officers of EOCO and FIC were trained by the West Africa Regional Centre, FBI and the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) on how to undertake intelligence gathering work.

The FIC reported conducting orientations, for five (5) newly appointed Anti-Money Laundering Reporting Officers/Compliance Officers (AMLROs/COs) on their duties and obligations under the AML Act 2008 (Act 749), as amended.

#### **ix. Operationalize and widen the outreach of EOCO countrywide**

This Broad activity had EOCO as the lead IP, and MoF, PSC, A-G as collaborating agencies. The Specific Activity was for *EOCO to establish offices in the districts*. No district office was established in the year.

#### **x. Train officers of the EOCO and law enforcement agencies in basic investigation techniques, basic drug enforcement, basic intelligence, asset tracing, money laundering**

Under this Broad Activity there were five (EOCO, Police, FIC, NACOB, BNI) lead IPs, whereas the Police Training School is the collaborating agency. The Specific Activity was to *train officers*

*in basic investigation techniques, basic drug law enforcement, basic intelligence, asset tracing, money laundering.*

Fifty (50) officers from EOCO received both local and international trainings in basic investigations, basic intelligence, asset tracing and money laundering. Some of the institutions that offered these training are the FBI (USA), GIABA, STAAC, Interpol and the West Africa Regional Centre.

Selected officers of FIC were trained by the West Africa Regional Centre, FBI and the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) in intelligence gathering. Additionally, over 1,076 staff of financial institutions benefitted from trainings and sensitization workshops in basic investigation techniques, basic intelligence, asset tracing and money laundering/combating the financing of terrorism. Participants were drawn from Accra, Kumasi and Takoradi.

#### **xi. Strengthen AG's Department to facilitate speedy prosecution of corruption cases**

Under this Broad Activity there was one lead IP (Attorney-General), and five collaborating agencies (Ghana Police Service, Law enforcement Agencies, ACAs, A-G, and Parliament of Ghana). This Broad Activity had two Specific Activities which were;

- a) Provide logistics for prosecutors, and
- b) Train 80 prosecutors.

##### **a. Provide logistics for prosecutors**

The Office of the Attorney-General procured modern equipment and tools (computers and accessories) for use in intelligence and investigations.

The Office of President reported it supported the Office of Special Prosecutor with logistics.

##### **b. Train 80 prosecutors**

The Office of the Attorney-General trained 87 prosecutors to enhance their knowledge and skills on emerging trends of corruption and other related crimes.

#### **xii. Build capacity of anti-corruption institutions to perform their respective mandates and functions**

Under this Broad Activity, Anti-corruption institutions were the Lead IPs while the Ministry of Finance was the collaborating agency.

This Broad activity had four Specific Activities namely:

- a) Fill vacancies created in Anti-Corruption Institutions;
- b) Procure modern investigations equipment and tools to support investigations;

- c) Procure vehicles and other logistics; and
- d) Train officers on the use of the modern equipment and tools used in investigations.

**a. Fill vacancies created in Anti-Corruption Institutions**

CHRAJ reported that 28 senior officers including legal officers were recruited to fill various vacancies.

**b. Procure modern investigations equipment and tools to support investigations.**

EOCO reported it procured modern investigation tools and equipment to support the work of the Office. CHRAJ procured 2 digital cameras and 5 Sony recorders to aid investigations.

**c. Procure vehicles and other logistics**

EOCO received from the Office of the President 2 buses, three pickups and 10 saloon cars.

**d. Train officers on the use of the modern equipment and tools used in investigations**

EOCO provided training on the use of the investigations equipment such as the FARADAY BAG among other modern equipment, both home and abroad.

CHRAJ reported that relevant officers of the Commission received internal training on the use of the equipment and tools acquired for investigative work.

**xiii. Review Challenges in the implementation of Whistle-blowers Act**

Under this Broad Activity, the Office of the A-G and GACC were the lead. The specific activity is to *enact the Whistle-blower Amendment Bill*.

The Office of the A-G reported that it has revised the Whistleblower (Amendment) Bill for consideration. GII and other CSOs advocated for the passage of the Whistleblower Amendment Bill into law.

**xiv. Strengthen the use of IT in intelligence and investigations**

Under this Broad Activity the lead IPs were the anti-corruption agencies while CSOs, GIFEC, MDAs, and MMDAs represent the collaborating agencies for this activity. There were two Specific Activities to be implemented:

- a) Procure modern equipment and tools used in intelligence and investigations,
- b) train officers on the use of the modern equipment and tools used in intelligence and investigations.

**a. Procure modern equipment and tools used in intelligence and investigations**

The Office of the A-G procured some modern equipment and tools (computers and accessories) for intelligence and investigations on the Case Tracking System.

The FBI and the National Security assisted EOCO to procure modern investigations equipment and tools to support the operations of the Office.

**b. Train officers on the use of the modern equipment and tools used in intelligence and investigations**

The Office of the A-G trained officers on the use of the modern equipment and tools for the Case Tracking System.

The FBI offered scheduled personnel of EOCO the necessary training on the use of the investigations equipment such as the FARADAY BAG among other modern equipment both home and abroad.

**xv. Build Capacity of Anti-Corruption Institutions in asset tracing and recovery**

Under this Broad Activity, there were three (EOCO, FIC, and CHRAJ) lead IPs, whereas the Police, CSOs, and NCCE were the collaborating agencies. There were two Specific Activities to be undertaken as follows:

- a) train anti-corruption Institutions on asset tracing and recovery,
- b) Undertake exchange programmes on asset recovery with partners and networks.

**a. Train anti-corruption Institutions on asset tracing and recovery**

EOCO trained fifty (50) of its officers in both local and international trainings on basic investigations, basic intelligence, asset tracing, and money laundering. The institutions that offered the trainings include the FBI, GIABA, STAAC, Interpol and the West Africa Regional Centre. In addition, the Office undertook exchange programmes with the FBI, Interpol, STAAC Ghana and the UK National Crime Agency.

**b. Undertake exchange programmes on asset recovery with partners and networks**

EOCO undertook exchange programmes with the FBI, Interpol, STAAC Ghana and the UK National Crime Agency.

CHRAJ reported that its Deputy Commissioner in-charge of anti-corruption, together with the Director, Anti-Corruption participated in the UNCAC Inter-governmental Working Groups on Assets Recovery and Technical Assistance held under the auspices of UNODC in Vienna, Austria.

**xvi. Establish social movement and conduct social marketing campaigns to boost public support for the work of Anti-Corruption Agencies**

Under this Broad Activity GACC and CSO were both lead and collaborating IPs. There are two specific activities to be undertaken:

- a) Conduct social marketing campaigns to boost public trust and support for the work of Anti-Corruption Agencies to other regions.



b) Expand social movement.

**a. Conduct social marketing campaigns to boost public trust and support for the work of Anti-Corruption Agencies to other regions**

GACC social media anti-corruption campaign reached about seventy thousand, and eight hundred (70,800) people. The GII mentioned that the ADISS Consortium provided the Citizen Groups (CGs)/Anti-Corruption Champions (ACCs) with support to continue their public education activities at the District level using various platforms including social group gatherings, radio and information centers. The GII mentioned that the public education centered on areas including the ADISS project, manifestations of corruption, legislative frameworks (RTI, Whistleblowers Act, etc.) citizens role in holding public officers accountable and fighting corruption through available reporting mechanisms (including ALAC) at the district level.

GII during the period recorded 8,815 citizens (Male-3,763, Female-5,052) who were sensitized through face to face interventions, while an estimated seventy-five thousand (75,000) citizens were also sensitized via radio programmes.

**b. Expand social movement**

GACC organized a forum in collaboration with EOCO. The objective was to deepen the relationship between EOCO and key stakeholders. About two hundred (200) stakeholders including public institutions (State anti-corruption institutions), private institutions, donors, embassies, media and CSOs attended the forum.

Ghana Integrity Initiative (GII) established thirty-one (31) citizens groups called Social Auditing Clubs across the ten (10) Regions of the country.



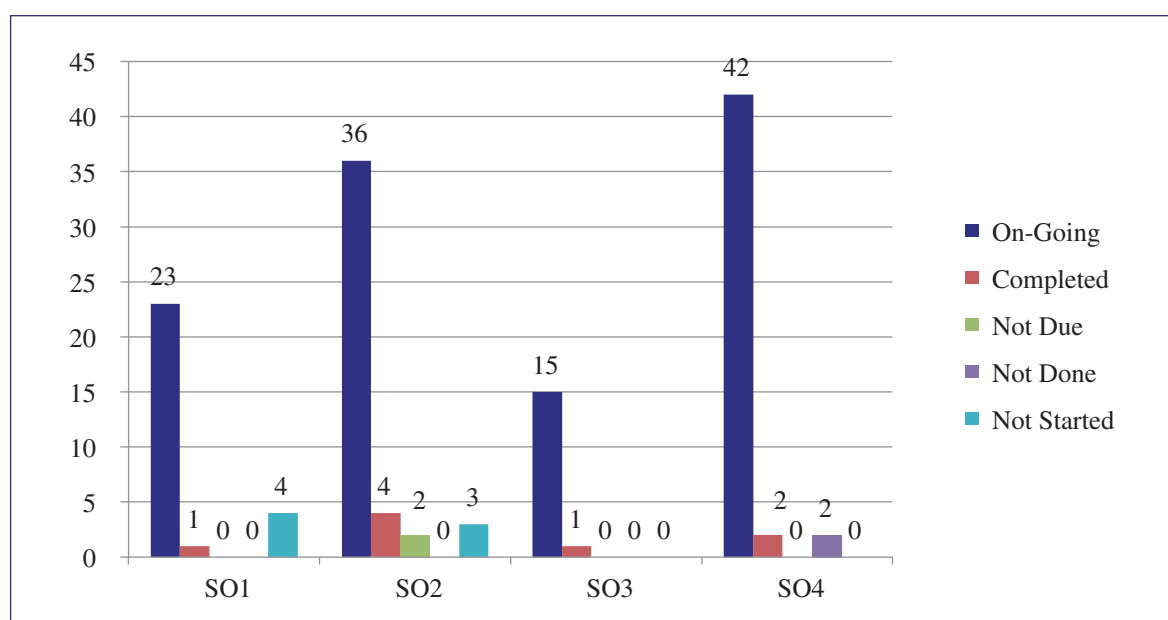
## SECTION FIVE: PERFORMANCE OVER THE PERIOD 2015-2019

### Introduction

This section presents a summary of the performance of the NACAP since its inception in 2015. The analysis for the 5-year period is centered on performance of 135 NACAP broad activities prioritised in AWP for implementation, categorized in four Strategic Objectives under the NACAP, and with the time-frame divided into short term (1-2 years), medium term (1-5 years) and long term (1-10 years). Similarly, the section provides analysis of the relationship between the 135 activities planned, and their level of implementation by variables: ongoing (OG), completed (CT), Not Due (ND), Not Done (NtD) and not started (NS).

NACAP has made some modest strides over the 5-year period. The results presented in Tables 12-15 indicate progressive performance of NACAP under the 3 level time-frames. Out of a total of 135 broad activities 24 short term (ST), 47 medium term (MT), 64 long term (LT) were planned for implementation. In all, 124 planned activities made up of, 24 short term, 41 medium term, and 59 long term activities are at various stages of implementation.

Figure 5: Broad Activities implemented under the strategic objectives



Out of a total of 135 broad activities under NACAP, the majority, 124 (91.9%) are at various levels of implementation, (8 have been completed and 116 are on-going). Out of the 11 (8.1%) remaining broad activities, two (2) are not due for implementation, Seven (7) have not been started yet, whilst two (2) have not been done.

The following are the completed activities:

1. Unify remuneration, including sitting allowances for Boards/Council members and companies of public institutions, boards and agencies- Strategic Objective 1
2. Extend EITI principles to the Oil and Gas sector- Strategic Objective 2
3. Develop and implement a National Strategic Framework for Strengthening Judicial Capacity and Integrity- Strategic Objective 2
4. Develop and enforce Code of Ethics for MPs- Strategic Objective 2
5. Review the Code of Conduct for Judges and Magistrates- Strategic Objective 2
6. Enact the Right to Information Law- Strategic Objective 3
7. Enact Witness Protection Legislation- Strategic Objective 4
8. Re-structure CHRAJ triple mandates: Corruption, Human Rights, and Administrative Justice Strategic Objective 4

Table 12: Progress Made in Implementation of NACAP SO1 (2015-2019)

No.	Broad Activity	Time frame (Short Term = S, Medium Term = M, Long Term = L)			
		S	M	L	
1	Institute a National Cultural Review Programme		√		Not started
2	Organise regular public education and awareness programmes on the evils of corruption and the ethos of anti- corruption in MDAs, general public, and private sector organisations			√	Ongoing
3	Create public fora/community outreach/clinics at District Level			√	Ongoing
4	Provide incentives, including free legal services for public interest litigation			√	Not Started
5	Mainstream anti- corruption, ethics and integrity in public, private sectors, civil society and religious organisations			√	Ongoing
6	Introduce modules and elements to highlight and strengthen good ethical values in primary, secondary, tertiary, formal & non- formal education		√		Ongoing
7	Develop co- curricular anti- corruption activities, such as integrity clubs in Junior and Senior High schools		√		Ongoing
8	Provide educational corruption fighting materials for public, schools and universities, and general public		√		Ongoing
9	Introduce anti- corruption sermons/teaching in Churches		√		Ongoing
10	Organise awareness raising programmes on the negative impact of money laundering and financing of terrorism on sustainable development and security for the general public			√	Ongoing

11	Conduct assessment of Institutions/agencies on the integration of corruption prevention measures in their work programmes			√	Ongoing
12	Unify remuneration, including sitting allowances, for Board/ Council members and companies of public Institutions, boards and agencies			√	Completed
13	Depoliticise corruption and other related crimes			√	Ongoing
14	Enforce the Public Financial Management legislation			√	Ongoing
15	Strengthen Public complaints Units in the Judicial and Ghana Police Services		√		Ongoing
16	Develop and implement anti- corruption programmes in music and drama		√		Ongoing
17	Establish an Ethics Development Centre			√	Not started
18	Intensify public education on linkage between corruption and fundamental human rights and freedoms to the general public, MDAs and CSOs	√			Ongoing
19	Establish special awards on integrity at all levels			√	Ongoing
20	Strengthen anti- corruption capacity at the District, regional levels and encourage whistleblowing			√	Ongoing
21	Institute Whistle- blowing mechanism at District & Regional levels		√		Ongoing
22	Undertake measures to prevent corruption in the election of Chief Executives and members of MMDAs		√		Ongoing
23	Ensure transparent, equitable and non-partisan allocation of public/state resources at all levels		√		Ongoing
24	Organise programme to sensitize the private sector to include anti- corruption clauses in business contracts	√			Ongoing
25	Incorporate and enforce anti- corruption clauses in business contracts	√			Ongoing
26	Develop and implement code of conduct for corporate bodies, traditional authorities and not-for-profit organisations			√	Ongoing
27	Provide incentives for private sector that enforce anti-corruption provisions			√	Not-Started
28	Sign Integrity pacts			√	Ongoing
Total		3	10	15	

Table 13: Progress Made in Implementation of NACAP SO2 (2015-2019)

No.	Broad Activity	Time frame (Short Term = S, Medium Term = M, Long Term = L)			
		S	M	L	
1	Conduct systemic examination of vulnerable institutions, MDAs and Public Institutions to identify and plug loopholes			√	Ongoing
2	Monitor implementation of system examination reports and recommendation		√		Ongoing
3	Rotate roles and, schedules of revenue staff, and accountants		√		Ongoing
4	Introduce computerised and net-based system in all revenue collection/ generation Agencies			√	Ongoing
5	Simplify procedures of tax assessment, collection and payment verification		√		Ongoing
6	Develop and implement user-friendly, efficient and effective tax administration systems		√		Ongoing
7	Enact a Budget law		√		Not started
8	Build capacity of MDAs for transparent use of public resources			√	Ongoing
9	Extend EITI principles in the Oil and Gas sector			√	Completd
10	Develop and implement Customer Service Charters in all MDAs, public and private sector Institutions			√	Ongoing
11	Ensure that MDAs and MMDAs prepare financial statements on time for audit			√	Ongoing
12	Establish and strengthen Audit Report implementation Committees in all MDAs and MMDAs	√			Ongoing
13	Enforce Legislation regulating the operations of political parties			√	Ongoing
14	Enact law setting ceiling on political party financing and election expenditures		√		Not Started
15	Establish a Parliamentary Committee to follow-up on PAC recommendations on the AuG's report	√			Ongoing
16	Enact a Law on Code of Conduct for Public Officers	√			Ongoing
17	Develop and enforce Code of Ethics for MPs	√			Completd
18	Enforce and monitor compliance with the codes of Conduct/ethics			√	Ongoing
19	Inaugurate and operationalize the National Ethics Advisory Committees of MDAs	√			Ongoing
20	Assess performance and functioning of the National Ethics Advisory Committees and all other Ethics Committees of MDAs		√		Ongoing
21	Create and operationalise Integrity Committees/Ethics Committees within State Institutions		√		Ongoing

No.	Broad Activity	Time frame (Short Term = S, Medium Term = M, Long Term = L)			
		S	M	L	
22	Develop and Implement Public Service Integrity Programme			√	Ongoing
23	Review the Assets Declaration Law	√			Ongoing
24	Train Ministers, MPs and other Public Officers on Public Sector Ethics		√		Ongoing
25	Enforce conflict of interest rules and educate public officers on conflict of interest	√			Ongoing
26	Request public officers to disclose personal interests, e.g. affiliations, upon taking up public appointment	√			Ongoing
27	Review SSS Implementation Policy		√		Ongoing
28	Strengthen the capacity of MMDAs for accountable and effective service delivery at the district level		√		Ongoing
29	Appoint CEOs of State Institutions through open, competitive and transparent processes		√		Ongoing
30	Create civic awareness to enable public to demand accountability from public officials			√	Ongoing
31	Conduct public expenditure tracking surveys			√	Ongoing
32	Strengthen GACC and widen its membership to include Human Rights Organizations	√			Ongoing
33	Train journalists in investigative journalism			√	Ongoing
34	Protect journalists by providing legal assistance if their reporting on corruption results in criminal charges		√		Not Started
35	Develop and implement a National Strategic Framework for Strengthening Judicial Capacity and Integrity			√	Completed
36	Review the code of conduct for judges and Magistrate		√		Completed
37	Organise town hall meetings at the local level aimed at enhancing public trust in the justice system	√			Ongoing
38	Incorporate and enforce anti-corruption provisions in business contracts	√			Ongoing
39	Audit schools/ institutions accounts annually as required by law	√			Ongoing
40	Provide adequate security for the preparation, packaging and distribution of exam papers	√			Ongoing
41	Develop Code of Conduct for lecturers of tertiary Institutions and tutors of other institutions of higher learning		√		Ongoing
42	Develop and implement code of conduct for corporate bodies, traditional authorities and not-for-profit organisations		√		Ongoing
43	Develop and implement public assets management system			√	Ongoing
44	Evaluate the implementation of NACAP at the end of the 10 year period (i.e. 2025).			√	Not Due
45	Formulate NACAP 2 based on end of period evaluation			√	Not Due
<b>Total</b>		<b>14</b>	<b>15</b>	<b>16</b>	

Table 14: Progress Made in Implementation of NACAP SO3 (2015-2019)

No.	Broad Activity	Time frame (Short Term = S, Medium Term = M, Long Term = L)			Comment
		S	M	L	
1	Educate Media Practitioners and NGOs on anti-corruption methods, practices and challenges of fighting corruption			√	Ongoing
2	Train media and NGOs on anti-corruption methods and practices			√	Ongoing
3	Develop and implement a Code of Ethics/Conduct for Journalists and Media houses		√		Ongoing
4	Develop Whistle Blowing & other reporting mechanism (e.g. complaints and suggestion boxes, hotlines)			√	Ongoing
5	Undertake awareness-raising programmes for the public on whistle-blowing		√		Ongoing
6	Create a confidential system for citizens to report cases of corruption and provide legal advice to victims of corruption			√	Ongoing
7	Enact the Right to Information Law	√			Completed
8	Educate and sensitize Public and Civil Servants, Media, Civil Society and general public on the Right to Information Law		√		Ongoing
9	Set up an independent body (with a strong civil society presence) to monitor the implementation of the Right to Information Law		√		Ongoing
10	Conduct and publish yearly studies on state of corruption in Ghana			√	Ongoing
11	Commission national surveys of public perception, awareness, attitudes, and performance of ACAs bi-annually			√	Ongoing
12	Clear backlog of audit works and undertake timely auditing of state institutions	√			Ongoing
13	Increase the allocation of resources to audit agencies		√		Ongoing
14	Establish and enforce Codes of Conduct within NGOs			√	Ongoing
15	Formulate and implement a National Policy on NGO programmes			√	Ongoing
16	Strengthen Institutional and operational capacity of Civil Society Organizations in monitoring and evaluating public revenue and expenditure and physical projects			√	Ongoing
<b>Total</b>		<b>2</b>	<b>5</b>	<b>9</b>	

Table 15: Progress Made in Implementation of NACAP SO4 (2015-2019)

No.	Broad Activity	Time frame (Short Term = S, Medium Term = M, Long Term = L)			Comment
		S	M	L	
1	Ratify and domesticate international conventions relating to corruption, money laundering and transnational organized crime			√	Ongoing
2	Amend the definition of corruption as provided in the Criminal Code 1960 to conform with the provisions of the United Nations Convention Against Corruption (UNCAC) and AU Convention Preventing and Combating Corruption	√			Ongoing
3	Enforce Anti-Corruption laws impartially, regardless of position or status of parties involved			√	Ongoing
4	Enact Witness Protection Legislation			√	Completed
5	Enforce the implementation of the Financial Management Laws and Regulations	√			Ongoing
6	Acquire communication and information technology equipment to support investigations			√	Ongoing
7	Provide and furnish office accommodation for Anti-Corruption Agencies			√	Ongoing
8	Recruit Prosecutors for A-G's Office			√	Ongoing
9	Build the capacity of EOCO and FIC to undertake intelligence gathering work			√	Ongoing
10	Operationalise and widen the outreach of EOCO country-wide			√	Ongoing
11	Train officers of the EOCO and law enforcement agencies in basic investigation techniques, basic drug law enforcement, basic intelligence, asset tracing, money laundering			√	Ongoing
12	Strengthen A-G's Department to facilitate speedy prosecution of corruption cases	√			Ongoing
13	Establish an independent prosecution Authority		√		Not Done
14	Recruit state prosecutors for CHRAJ and EOCO		√		Ongoing
15	Build capacity of Anti-Corruption Institutions to perform their respective mandates and functions			√	Ongoing
16	Harmonise activities of public institutions fighting corruption+			√	Ongoing
17	Strengthen Collaboration among Anti-Corruption Agencies (ACAs)	√			Ongoing
18	Re-structure CHRAJ triple mandates: Corruption; Human Rights, and Admin. Justice		√		Completed
19	Train Officers on Whistleblower Act		√		Ongoing
20	Review challenges in the implementation of Whistleblower Act		√		Ongoing

No.	Broad Activity	Time frame (Short Term = S, Medium Term = M, Long Term = L)			Comment
		S	M	L	
21	Expand computerized system of selecting judges to sit on cases		√		Ongoing
22	Extend computerization of court systems to all levels in all regions			√	Ongoing
23	Organise training for judicial service staff on computerized court system			√	Ongoing
24	Strengthen the use of IT in intelligence and investigations		√		Ongoing
25	Build Capacity of Anti-Corruption Institutions in asset tracing and recovery			√	Ongoing
26	Review complaints handling procedures to reduce period of disposing of corruption complaints	√			Ongoing
27	Train investigators, and prosecutors in financial investigations, restraint, confiscation, Mutual legal Assistance			√	Ongoing
28	Train investigators and prosecutors on witness protection legal framework		√		Ongoing
29	Issue Regulations for the implementation of all anti-corruption and related legislation			√	Ongoing
30	Strengthen the national coordination capacity in combating transnational corruption and organised crime			√	Ongoing
31	Undertake an in-depth review of legislation on, mandatory sentences for drug offences and non-bailable crimes		√		Ongoing
32	Organise study sessions on the vulnerability to money laundering and terrorism financing			√	Ongoing
33	Build Capacity of FIC on financial intelligence analysis		√		Ongoing
34	Establish social movement and conduct social marketing campaigns to boost public support for the work of Anti-Corruption Agencies	√			Ongoing
35	Establish Anti- Corruption Courts		√		Ongoing
36	Re-train and sensitize all Judges and Magistrates in the Anti-Corruption courts			√	Ongoing
37	Provide constitutional security of tenure of office for the IGP and heads of Anti-corruption/security agencies		√		Not Done
38	Conduct public Relations Programmes to enhance image of the Police Service		√		Ongoing
39	Train Police officers in Public Relations and Customer Care		√		Ongoing
40	Establish Customer Care Desks in all Police Stations		√		Ongoing
41	Undertake programmes on ethics, integrity and human rights for Police Officers		√		Ongoing
42	Train Police officers on records management			√	Ongoing



No.	Broad Activity	Time frame (Short Term = S, Medium Term = M, Long Term = L)			Comment
		S	M	L	
43	Complete implementation of community policing Programme throughout the country			√	Ongoing
44	Strengthen PIPs		√		Ongoing
45	Apply stiffer sanctions to Police personnel found culpable of misconduct			√	Ongoing
46	Organise professional training programmes for Police Officers			√	Ongoing
<b>Total</b>		<b>6</b>	<b>17</b>	<b>23</b>	

Tables (12-15) indicate that all (24) short term activities captured under NACAP are at various stages of implementation. Two (2) short-term activities were completed (CT).

With the medium term activities, 41 out of 47 activities were at various stages of implementation, with two (2) activities completed (CT).

For long term activities, 50 out of 64 activities were at various stages of implementation with four (4) activities completed. Thus for the 5-year period, a total of 11 activities out of 135 are awaiting implementation.

## Independent Reports of Relevance to NACAP

In compiling this report, notice was also taken of some independent reports from various organizations including the African Governance Report 2019 by Mo Ibrahim Foundation and Corruption Perception Index (CPI) 2019 by Transparency International.

According to the African Governance Report, there has been progress in Anti-Corruption Mechanism where the African average score has increased by +2.0 points since 2014. Leading to a still low score of 32.7 in 2017. The positive change was driven by 26 countries that improved with Seychelles (+37.5), Nigeria (24.3) and Ghana (+23.6) showing the largest progress.

According to the 2019 Corruption Perception Index (CPI) which was released worldwide on January 23, 2020, scoring and ranking 180 countries and territories by their perceived levels of corruption by Transparency International, Ghana scored 41 out of a possible clean score of 100. The 2019 score of 41 shows that Ghana's score remained the same compared to its 2018 score (41). Ghana performed better than 37 other Sub-Saharan African countries including Burkina Faso 40, Lesotho 40, Ethiopia 37, Gambia 37, Tanzania 37, and performed below 9 others.

Ghana could not however catch up with countries like South Africa, Senegal, São Tomé and Príncipe that scored better than Ghana in 2018.

## Number of IPs Reporting on Activities Implemented over the Period 2015-2019

Cumulatively, 227 IPs reported contributing to the implementation of 124 (out of 135) NACAP activities over the period 2015-2019. Below are the charts showing number of IPs reporting over the period on implementation against the various strategic objectives.

Figure 6: IPs reporting on Strategic Objective One for the period 2015-2019

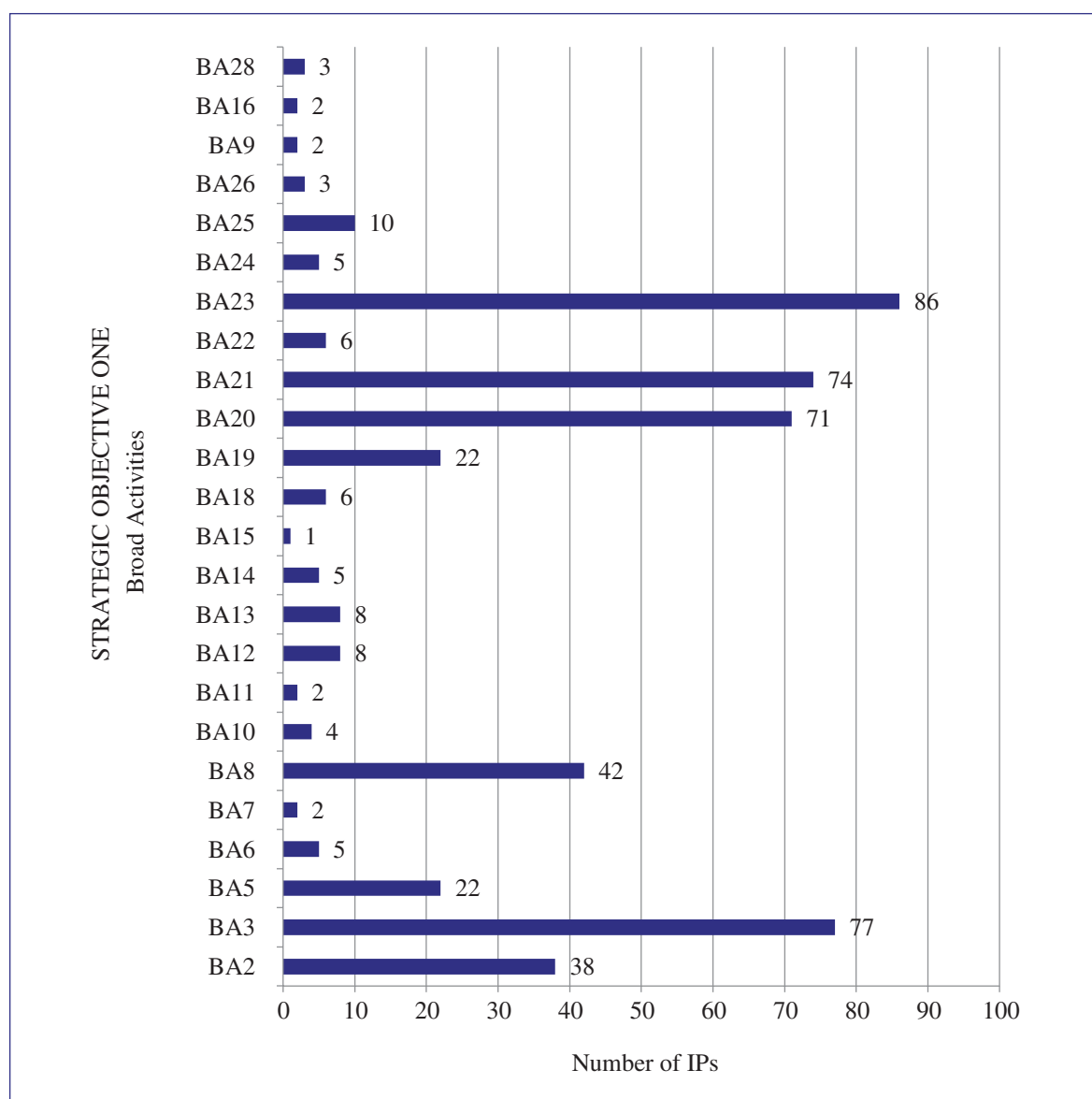


Figure 7: IPs reporting on Strategic Objective Two for the period d 2015-2015

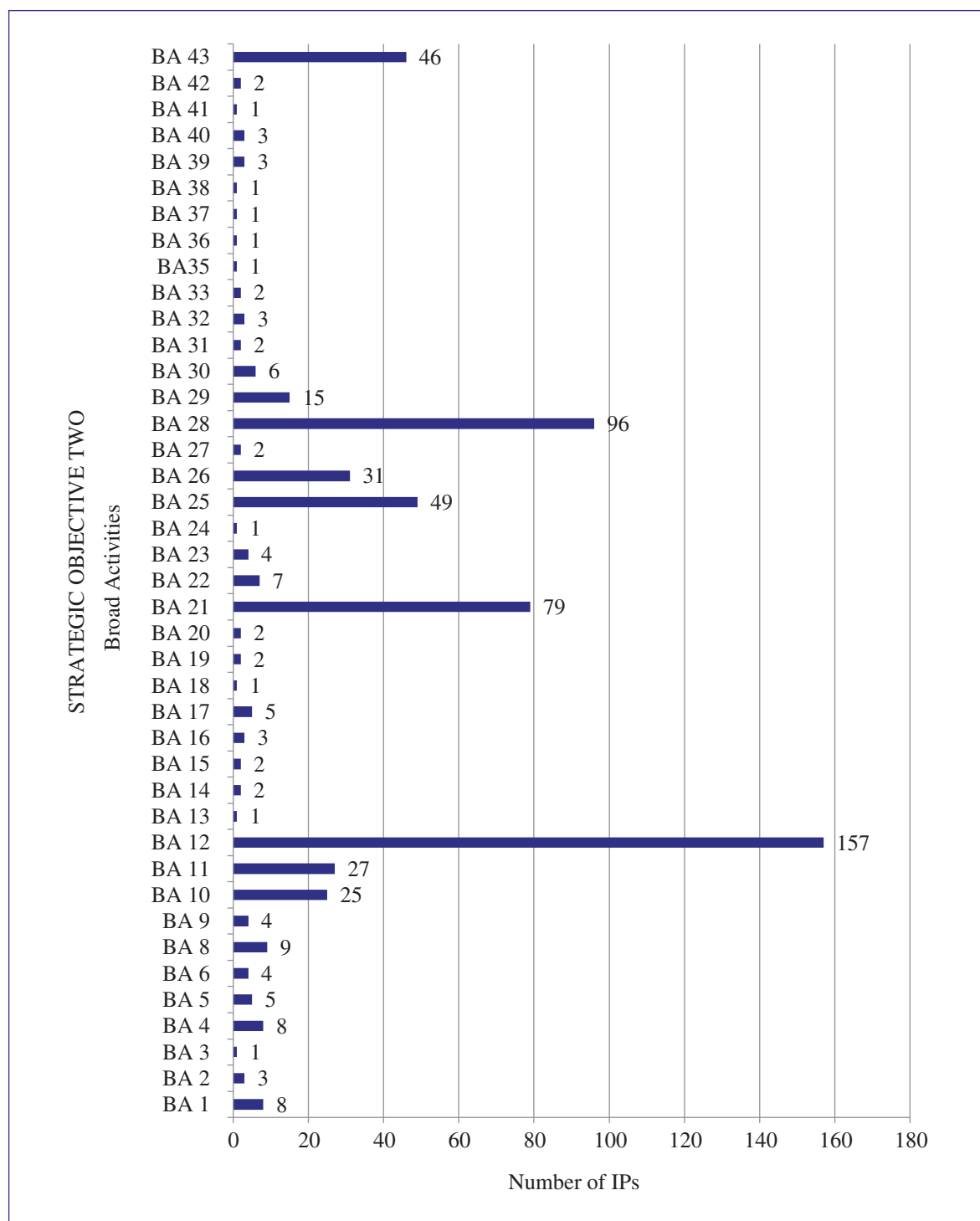


Figure 8: IPs reporting on Strategic Objective Three for the period 2015-2015

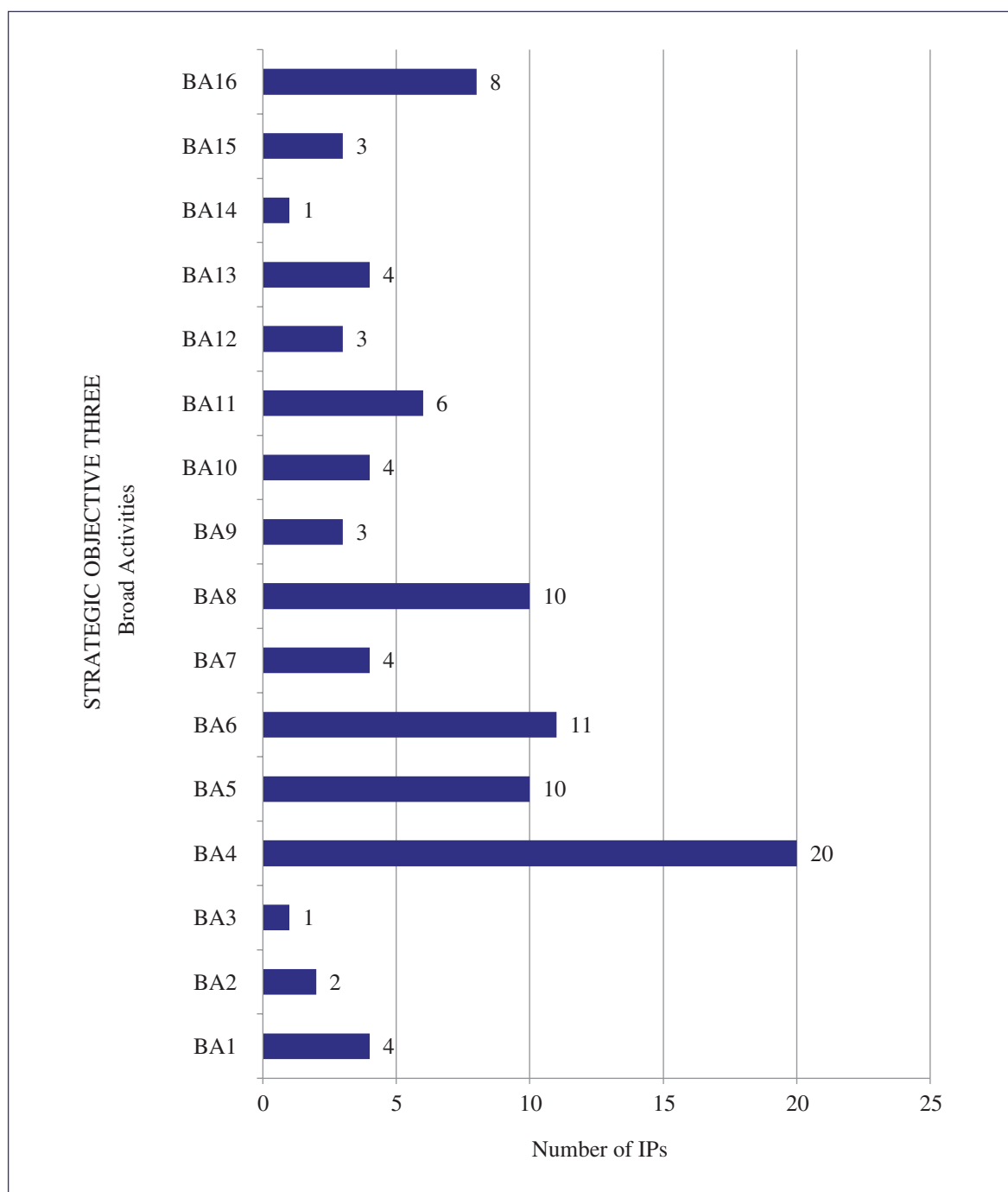
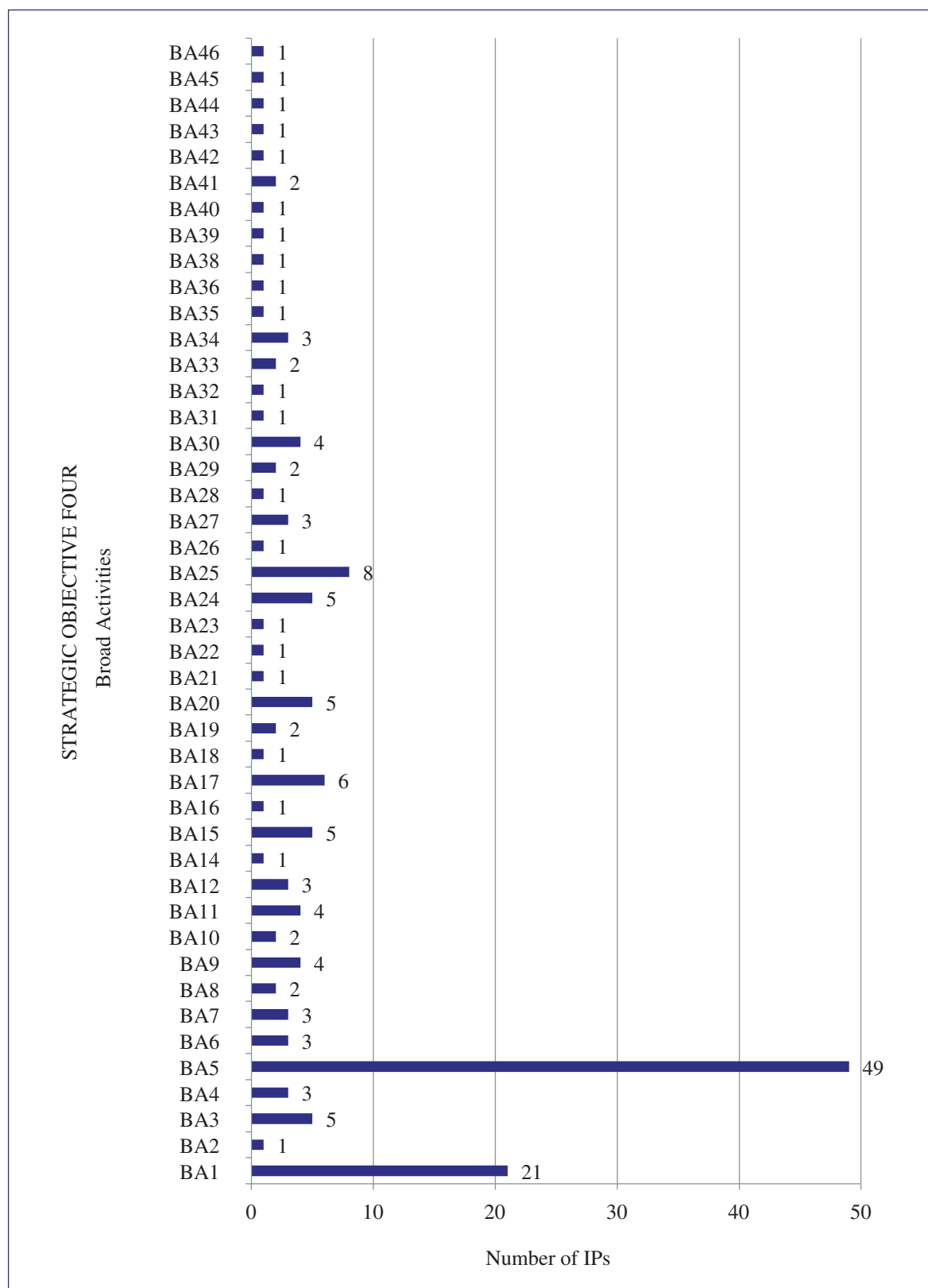


Figure 9: IPs reporting on Strategic Objective Four for the period 2015-2015





## SECTION SIX: CONCLUSIONS, RECOMMENDATIONS AND OUTLOOK FOR 2020

### 6.1. Conclusion

Ghana, since adoption and implementation (2015-2019) of the NACAP has made modest strides and significant contribution towards implementation and the realisation of the objectives of the UNCAC and the African Union Convention on Preventing and Combating Corruption (AUCPCC). Among others:

- NACAP implementation continues to improve, with 101 broad activities (out of 135) at various stages of implementation.
- Awareness of the evils of corruption and the mechanisms for reporting corruption, including whistleblowing, has increased.
- More institutions have either established or are establishing safe reporting mechanisms at the work place.
- Digitization of key revenue collection agencies.
- Accelerated digitization of banking and financial industry.
- Digitization of ports operations.
- Digitization of economy.
- Automation of Superior Courts.
- Revision of Code of Conduct for Judges and Magistrates.
- Establishment of the Financial and Economic Crimes Court.
- Development of Code of Conduct for MPs.
- Establishment of 444 Audit Committees in State Institutions (85% coverage).
- Establishment of Public Relations and Complaint Units of the Judicial Service in all regional capitals.
- Establishment of Public Relations Units of the Police Service in all regional capitals.
- Expansion of Ghana Anti-Corruption Coalition (GACC).
- Improvement in financing of Audit Service.
- Development and launch of the Judicial Service Anti-Corruption Action Plan.
- The role of the Public Service Integrity Programme (PSIP), including enforcement of the Code of Conduct for Public Officers, Asset Declaration regime, Conflict of Interest rules and Gift Policy in public sector institutions has intensified.
- Adoption of sexual harassment policies at the work place by many institutions.
- Introduction of Integrity Awards.
- Enforcement of the relevant laws by ACAs.
- Positive public response to the call to report corruption.
- Investigative journalism and media exposé are on the rise.
- Office of the Special Prosecutor has been established to add to the legal and institutional architecture for prosecutions of corruption offences.
- Special exercise to remove doubtful financial institutions from the banking and financial industry.

- More pieces of legislation have been introduced to improve the legal framework for fighting corruption, among them are:
  - i. Petroleum Revenue Management (Amendment) Act, 2015 (Act 893).
  - ii. The Public Procurement (Amendment) Act, 2016 (Act 914).
  - iii. Public Financial Management ACT, 2016 (921).
  - iv. Ghana Deposit Protection ACT, 2016 (ACT 931).
  - v. Office of the Special Prosecutor Act, 2018 (Act 959).
  - vi. The Witness Protection Act, 2018 (Act 975).
  - vii. The Right to Information (RTI) Act, 2019 (Act 989).
  - viii. The Companies ACT 2019, (ACT 992).
  - ix. Introduction of Beneficial Ownership in the Companies Act.
- Ghana has adopted the week leading to the International Anti-Corruption Day (IACD) on 9<sup>th</sup> December as the Anti-Corruption and Transparency (ACT) Week with activities including disseminating NACAP annual progress reports to stakeholders.
- Ghana was reviewed under the 1st and 2nd cycle of UNCAC Review Mechanism in 2015 and 2019 respectively.
- Ghana has been fulfilling its international obligations under the UNCAC and participating in meetings of UNCAC Mechanisms.
- Ghana has established the Financial Stability Council by Executive Instrument to enhance the stability and soundness of the financial system. This makes Ghana, the country in sub-saharan Africa to establish such a council after Mauritius.

## 6.2. Challenges

- i. Inadequate resources to support NACAP implementation.
- ii. Low patronage and reporting on implementation of NACAP.
- iii. Delay in passing key anti-corruption legislation.

## 6.3. Recommendations

The following are recommendations for implementation of the 2020-2021 reporting period:

- Implementation of the NACAP Communication Strategy.
- Introduce sanction regime by naming and shaming IPs that do not report.
- Prioritize key anti-corruption legislations including the Conduct of Public Officers Bill, the Illicit Enrichment law and the Whistleblower (Amendment) Bill.
- Conduct a mid-term review of the NACAP.
- Conduct an Actual Corruption Survey.
- Conduct a Gender and Corruption Survey.
- Implement the Schools Ethics Education Programme.



- Continue the sensitization on the NACAP and the training of IPs on the NACoRD to address reporting challenges encountered in the use of NACoRD and improve level of reporting by IPs.
- Engage Media Establishments to implement the NACAP and submit reports.

## 6.4. Outlook for 2020

For 2020, the AWP will seek to address the following, among others:

- i. Conduct Mid-Term review for the Short and Medium Term (1-5 year) Programmes.
- ii. Conduct an Actual Corruption Survey.
- iii. Conduct a Gender and Corruption Survey.
- iv. Introduce and implement ethics and anti-corruption education in schools.
- v. Enactment of recommended anti-corruption laws.
- vi. Retrain focal persons of NACAP IPs.

Continue to explore solutions to poor funding for the implementation of NACAP. As noted above, funding for implementation of NACAP is still low. We will engage with GOG and MoF to appreciate investment in anti-corruption efforts as strategic investment that will yield high dividends, including protection of the public purse and reducing leakages.

Explore Strategic measures to increase the participation of IPs in the implementation of NACAP in the 2020 AWP. In particular, extra effort would be made to increase the interest of more CSOs, media, private sector organisations and faith based organisations to budget for, implement and report on NACAP.



## APPENDICES

### Appendix A: List of HiLIC Members

S/No.	Name	Institution
1	Mr. Samuel A. Jinapor	Office of the President
2	Mr. Richard Quayson	Commission on Human Rights and Administrative Justice
3	Mr. Charles Ayamdoo	Commission on Human Rights and Administrative Justice
4	Mr. Godwin Brucke	Office of the Head of Civil Service
5	Dr. Charles Kessey	Office of the Head of Local Government Service
6	Dr. Nana Frimpong	Public Services Commission
7	Sir. Walter Amewu	Economic and Organised Crime Office
8	Mrs. Patricia Dovi Sampson	Ministry of Information
9	Dr. Eric Osae	Internal Audit Agency
10	Mr. David Kennedy Segbenya	Ghana Audit Service
11	Mr. Joojo Ghansah	State Enterprises Commission
12	Mr. Gideon Kuma Ocras	Ministry of Local Government and Rural Development
13	Mr. Stephen Asare-Fianko	Controller and Accountant-General's Department
14	Mrs. Stella Williams	Ministry of Finance
15	Dr. Nana Opare-Djan	National Development Planning Commission
16	COP Nathaniel Kofi Boakye	Ghana Police Service
17	Dr. Nana Frimpong	Office of the President
18	Alhaji Ahmed Suleiman	Office of the Attorney-General & Ministry of Justice
19	Mr. Samuel Asare Akuamoah	National Commission for Civic Education
20	Her Ladyship Justice R. Sophia Bernasko	Judicial Service
21	Mr. Ebenezer Djietror	Parliament of Ghana
22	Mrs. Cynthia Storph-Tagoe	Ghana Education Service
23	Nana Osei-Bonsu	Private Enterprise Federation
24	Dr. Emmanuel Ankrah	Ghana Health Service
25	Mrs. Beauty E. Narteh	Ghana Anti-Corruption Coalition

## Appendix B: List of IPs with designated Focal Persons over the period (2015-2019)

S/N	Name of IP	S/N	Name of IP
1	Office of the President	36	Star Ghana
2	Parliament of Ghana	37	Centre for Democratic Development
3	Judicial Service	38	Centre of Posterity Interest, Techiman
4	Office of The Head of Civil Service	39	Creative Storm Network
5	Public Service Commission	40	Ministry of Environment, Science, Technology & Innovation
6	Office of the Attorney General and Ministry of Justice	41	Ministry of Fisheries & Aquaculture Development
7	Auditor-General	42	Ministry of Information
8	Office of The Senior Minister	43	Ministry of Roads and Highways
9	Ministry of Finance	44	Ministry of Gender, Children & Social Protection
10	Ghana Police Service	45	Ministry of Lands & Natural Resources
11	Registrar-General's Department	46	Ministry of Planning
12	Ministry of Employment and Labour Relations	47	Ministry of Inner City & Zongo Development
13	Ministry of Petroleum	48	Ministry of Transport
14	Driver & Vehicle Licensing Authority	49	Ministry of Defence
15	Department of Social Welfare	50	Ministry of Tourism, Arts & Culture
16	Narcotics Control Board	51	Ministry of Works and Housing
17	Internal Audit Agency	52	Ministry of Youth & Sports
18	Commission on Human Rights and Administrative Justice	53	National Development Planning Commission
19	National Commission for Civic Education	54	Ministry of Agriculture
20	Social Security and National Insurance Trust	55	Ministry of Sanitation and Water Resource
21	Bank of Ghana	56	Ministry of Energy
22	National Communication Authority	57	Ghana Prisons Service
23	Ghana Export Promotion Authority	58	Ministry of Power
24	Ghana National Ambulance Service	59	Ministry of Aviation
25	National Board for Small Scale Industries	60	Energy Commission
26	Volta River Authority	61	Ghana Armed Forces
27	Ghana AIDS Commission	62	Ghana Statistical Service
28	Fair Wages and Salaries Commission	63	Council for Scientific and Industrial Research
29	Nurses & Midwifery Council	64	Ghana Atomic Energy Commission
30	Pharmacy Council	65	Environmental Protection Agency
31	Ghana Post	66	Land Use and Spatial Planning
32	Kwame Nkrumah University of Science and Technology	67	National Biosafety Authority
33	Private Enterprise Federation	68	Public Sector Reform Secretariat
34	Ghana Anti-Corruption Coalition	69	Ghana Investment Fund for Electronic Communications
35	Ghana Integrity Initiative	70	National Vocational and Technical Institute

S/N	Name of IP	S/N	Name of IP
71	Ghana National Petroleum Commission	106	Jaman North District Assembly, Drobo
72	National Film and Television Institute	107	Ga South Municipal Assembly, Ngleshi Amafrom
73	National Identification Authority	108	Suame Municipal Assembly, Tafo, Kumasi
74	Ghana Investment Promotion Centre	109	Gomoa West District Assembly
75	Public Records and Archives Administration Department	110	Akwapim South District Assembly, Aburi
76	National Pensions Regulatory Authority	111	Tamale Metropolitan Assembly
77	Savanna Accelerated Development Authority	112	Adenta Municipal Assembly, Gt. Accra Region
78	Bureau of National Investigations	113	Komenda-Edina-Eguafo Abrim Municipal Assembly
79	State Enterprises Commission	114	Kpandai District Assembly, Volta Region
80	Financial Intelligence Centre	115	Ekumfi District Assembly- Essarkir
81	National Road Safety Commission	116	Gomoa Central District Assembly
82	Head of Local Government	117	Sunyani Municipal Assembly
83	Economic and Organised Crime office	118	Mfantseman Municipal Assembly, Central Region
84	Regional Coordinating Council, Ho	119	Awutu Senya East Municipal Assembly
85	Regional Coordinating Council, Cape Coast	120	Yunyoo Nasuan District Assembly
86	Regional Coordinating Council, Wa	121	Dormaa Central Municipal Assembly
87	Regional Coordinating Council, Tamale	122	Zabzugu District Assembly
88	Regional Coordinating Council, Greater Accra	123	Jirapa Municipal Assembly
89	Accra Metropolitan Assembly	124	Sene East District Assembly
90	Tema Metropolitan Assembly	125	Awutu Senya West District Assembly
91	Berekum East Municipal Assembly	126	East Gonja Municipal Assembly, Salaga
92	Agona East District Assembly	127	Gomoa East District Assembly
93	Sunyani West District Assembly	128	Ketu South Municipal Assembly
94	Afigya Kwabre South District Assembly, Kodie	129	Sekyer Central District Assembly- Nsuta
95	Abura/Asebe/Kwamankese District Assembly	130	Tano South Municipal Assembly
96	Sagnerigu Municipal Assembly	131	North Gonja District Assembly, Daboya
97	Dormaa East District Assembly	132	Kadjebi District Assembly
98	Hohoe Municipal Assembly	133	Central Tongu District Assembly
99	Krachi East Municipal Assembly	134	Adansi South District Assembly-New Edubiasi
100	Afadzato South District Assembly	135	Prestea-Huni-Valley Municipal, Bogoso
101	Bodie District Assembly	136	Nkwanta South Municipal Assembly, Oti Region
102	Pru West District Assembly	137	Upper Denkyira East Municipal
103	Central Gonja District Assembly	138	Suaman District Assembly
104	Nanumba South District Assembly	139	Jaman South Municipal Assembly, Drobo
105	Assin South District Assembly	140	Tain District Assembly- Brong-Ahafo

S/N	Name of IP	S/N	Name of IP
141	Bia East District Assembly- Sefwi Adabokrom	175	East Mamprusi Municipal Assembly
142	Binduri District Assembly	176	Karaga District Assembly
143	Bawku West District Assembly	177	Bia East District Assembly
144	Pusiga District Assembly	178	Ahafo Ano North Municipal, Tepa
145	Ayawaso East Municipal Assembly, Nima	179	Wa East District Assembly
146	Wa Municipal Assembly, Wa,	180	Kumbungu District Assembly
147	Wassa East District Assembly	181	Aowin Municipal Assembly, Enchi
148	Lawra Municipal Assembly	182	Central Tongu District Assembly
149	Sissala West District Assembly	183	Bongo District Assembly
150	Kpando Municipal Assembly	184	Nabdam District Assembly
151	South Dayi District Assembly	185	Nkwanta North District Assembly
152	Wassa Amenfi West Municipal	186	Kintampo South District Assembly
153	Kpandai District Assembly	187	Atebubu Amanten Municipal Assembly
154	Asunafo South District Assembly	188	Ekumfi District Assembly, Essarkir
155	Ahanta West Municipal Assembly	189	South Tongu District Assembly
156	Assin Fosu Municipal Assembly	190	Gushegu Municipal Assembly
157	Amenfi Central Assembly	191	West Gonja District Assembly
158	Adaklu District Assembly	192	Bole District Assembly
159	North Dayi District Assembly	193	Nanumba North Municipal Assembly
160	Dafiana Bussie Issa District	194	Ada West District Assembly, Sege
161	Yendi Municipal Assembly	195	Sekyeri Central District Assembly, Nsuta
162	Keta Municipal Assembly	196	Tempene District Assembly
163	Garu District Assembly	197	Sekyeri Afram Plains District Assembly, Drobonso
164	Bawku Municipal Assembly	198	Ho West District Assembly
165	Akatsi South District Assembly	199	Nkoranza South Municipal Assembly
166	Builsa South District Assembly, Fumbisi	200	Bosome Freho District Assembly, Asiwa
167	Yunyoo Nasuan District Assembly	201	West Mamprusi Municipal Assembly
168	Bawku West District Assembly	202	Asunafo North Municipal Assembly
169	Wassa Amenfi East Municipal Assembly- Akropong	203	Wa West District Assembly
170	Sekondi Takoradi Metropolitan	204	Effia-Kwesimintsim Municipal
171	Saboba District Assembly	205	Kpone Akatamanso District Assembly
172	Pru East District Assembly	206	Akatsi North District Assembly
173	Shai-Osudoku District Assembly, Dodowa	207	Ledzekuku Municipal Assembly, Teshie
174	Nkawnta South Municipal Assembly, Oti Region	208	Weija-Gbawe Municipal Assembly, Weija

## Appendix C: Cumulative IPs reporting having implemented activities under NACAP over the period (2015-2019)

S/N	IP Name	S/N	IP Name
1	Ablekuman West Municipal Assembly	39	Bodi District Assembly Bodie
2	Abura/Asebe/Kwamankese District Assembly	40	Bole District Assembly
3	Accra Metropolitan Authority	41	Bongo District Assembly
4	Ada West District Assembly	42	Bosome Freho District Assembly
5	Adaklu District Assembly	43	Builsa South District Assembly
6	Adansi South District Assembly	44	Bureau of Ghana Languages
7	Adenta Municipal Assembly	45	Bureau of National Investigations
8	Afigya Kwabre South District Assembly	46	Center for Democratic Development
9	Agona East District Assembly	47	Central Gonja District Assembly
10	Ahafo Ano North Municipal	48	Central Tongu District Assembly
11	Ahanta West Municipal Assembly	49	Centre Of Prosterity Interest Organization
12	Akatsi North District Assembly	50	Commission on Human Rights and Administrative Justice
13	Akatsi South District Assembly	51	Controller and Accountant General Department
14	Akwapim South District Assembly	52	Creative storm network
15	Amenfi Central Assembly	53	Dafiama Bussie Issa District Assembly
16	Aowin Municipal Assembly- Enchi	54	Department of Social Welfare
17	Asante Akim South Municipal	55	Dormaa Central Municipal Assembly
18	Assin Fosu Municipal Assembly	56	Dormaa East District Assembly
19	Assin North District Assembly	57	Driver & Vehicle Lcensing Authority
20	Assin South District Assembly	58	East Gonja Municipal Assembly
21	Asunafo North Municipal Assembly	59	East Mamprusi Municipal Assembly
22	Asunafo South District Assembly	60	Economic and Organised Crime Office
23	Atebubu Amanten Municipal Assembly	61	Effia-Kwesimintsim Municipal Assembly
24	Attorney General	62	Ekumfi District Assembly
25	Auditor General Ghana	63	Electoral Commission
26	Awutu Senya East Municipal Assembly	64	Fair Wages and Salaries Commission
27	Awutu Senya West District Assembly	65	Financial Intelligence Centre
28	Ayawaso East Municipal Assembly	66	Ghana National Ambulance Service
29	Bawku Municipal Assembly	67	Savanna Accelerated Development Authority
30	Bawku West District Assembly	68	Ghana AIDS Commission
31	Berekum East Municipal Assembly	69	Ghana Anti-Corruption Coalition
32	Bia East Distirct Assembly	70	Ghana Education Service
33	Bia East District Assembly	71	Ghana Export Promotion Authority
34	Binduri District Assembly	72	Ghana Health Service
35	Lawra Municipal Assembly	73	Ghana Integrity Initiative
36	Ledzekuku Municipal Assembly	74	Ghana Investment Fund For Electronic Communications
37	Garu District Assembly	75	leadAfrique International
38	Ga South Municipal Assembly	76	Ghana Investment Promotion Centre

S/N	Partner Name	S/N	Partner Name
77	Ghana National Fire Service	115	Mfantseman Municipal Assembly
78	Ghana Police Service	116	Ministry of Agriculture
79	Ghana Prisons Service	117	Ministry of Aviation
80	Ghana Revenue Authority	118	Ministry of Defence
81	Ghana Standards Authority	119	Bank Of Ghana
82	Ghana Statistical Service	120	Ministry of Energy
83	National Identification Authority	121	Internal Audit Agency
84	National Pensions Regulatory Authority	122	Judicial Service
85	National Service Secretariat	123	National Vocational Training Institute
86	Kwame Nkrumah University of Science & Technology	124	Ministry of Employment and Labour Relations
87	Nursing & Midwifery Council	125	Ministry of Environment Science and Technology & Innovation
88	Office Of The Head Of Civil Service	126	Ministry of Finance
89	Office of the Head of Local Government Service	127	Ministry of Fisheries & Aquaculture Development
90	Office of the President	128	Ministry of Gender, Children & Social Protection
91	Office Of The Senior Minister	129	Ministry of Information
92	Parliament of Ghana	130	Ministry of Inner City & Zongo Development
93		131	Ministry of Lands & Natural Resources
94	Gomoa Central District Assembly	132	Ministry of Local Government and Rural Development
96	Gomoa East District Assembly	133	Ministry of Petroleum
97	Gomoa West District Assembly	134	Ministry of Planning
98	Gushiegu Municipal Assembly	135	Ministry of Roads and Highways
99	Ho West District Assembly	136	Ministry of Sanitation And Water Resource
100	Hohoe Municipal Assembly	136	Ministry of Tourism, Arts & Culture
101	Nabdam District Assembly	137	Ministry of Transport
102	Jaman North District Assembly	138	Ministry of Works and Housing
103	Jaman South Municipal Assembly	139	Ministry of Youth & Sports
104	Jasikan District Assembly	140	Nacortc and Control Board
105	Jirapa Municipal Assembly	141	National Board for Small Scale Industry
106	Nadowli Kaleo District Assembly	142	National Commission for Civic Education
107	Kadjebe District Assembly	143	National Communication Authority
108	Komenda-Edina-Eguafo Abrim Municipal Assembly	144	National Development Planning Commission
109	Karaga District Assembly	145	National Film and Television Institute
110	Keta Municipal Assembly	146	Social Security and National Insurance Trust
111	Ketu South Municipal Assembly	147	Star Ghana
112	Kintampo South District Assembly	148	State Enterprise Commission
113	Kassena Nankana Municipal Assembly	149	Public Procurement Authority
114	Kpandai District Assembly	150	Public Records and Archives Administration Department



S/N	Partner Name	S/N	Partner Name
151	Kpando Municipal Assembly	190	Public Sector Reform Secretariat
152	Kpone Katamanso Municipal Assembly	191	Public Service Commission
153	Krachi East Municipal Assembly	192	Volta River Authority
154	Krachi West District Assembly	193	Ghana Post
155	Kumbungu District Assembly	194	Private Enterprise Federation
156	Nanumba North Municipal Assembly	195	Minerals Commission
157	Nanumba South District Assembly	196	Northern Development Authority
158	Sekyeré Central District Assembly	197	Energy Commission
159	Sene East District Assembly	198	Ghana High Ways Authority
160	Sene West District Assembly	199	Tema Metropolitan Assembly
161	Nkoranza South Municipal Assembly	200	National Road Safety Commission
162	Nkwanta North District Assembly	201	Ghana National Petroleum Company
163	Nkwanta South Municipal Assembly	202	Ghana Atomic Energy Commission
164	Regional Coordinating Council	203	Environmental Protection Authority
165	Regional Coordinating Council	204	Ministry of Communication
166	Regional Coordinating Council	205	Land use and Spatial Planning
167	Regional Coordinating Council	206	Ghana Armed Forces
168	Regional Coordinating Council	207	Ghana Geological Survey Authority
169	Afadzato South District Assembly	208	Micro Finance and Small Loans Centre
170	North Dayi District Assembly	209	Ministry of Chieftaincy
171	Prestea-Huni-Valley Municipal Assembly	210	Council for Scientific and Industrial Research
172	North Gonja District Assembly	211	Registrar-General's Department
173	South Dayi District Assembly	212	Tempane District Assembly
174	Shai-Osudoku District Assembly	213	Saboba District Assembly
175	Sissala East Municipal Assembly	214	Upper Denkyira East Municipal Assembly
176	Sissala West District Assembly	215	Sagnerigu Municipal Assembly
177	Suaman District Assembly	216	Wa East District Assembly
178	Pru East District Assembly	217	Wa Municipal Assembly
179	Pru West District Assembly	218	Wa West District Assembly
180	South Tongu District Assembly	219	Wassa Amenfi East Municipal Assembly
181	Suame Municipal Assembly-Suame	220	Wassa Amenfi West Municipal Assembly
182	Sunyani Municipal Assembly	221	Wassa East District Assembly
183	Sunyani West District Assembly	222	Weija-Gbawe Municipal Assembly
184	Pusiga District Assembly	223	West Gonja District Assembly
185	Sekondi Takoradi Metropolitan Assembly	224	West Mamprusi Municipal Assembly
186	Sekyeré Afram Plains District Assembly	225	Yendi Municipal Assembly
187	Tain District Assembly- Brong	226	Yunyoo Nasuan District Assembly
188	Tamale Metropolitan Assembly	227	Zabzugu District Assembly
189	Tano South Municipal Assembly	228	Tarkwa-Nsuaem Municipal Assembly

## Appendix D: List of IPs with Sexual Harassment Policies

S/No.	IPs with Sexual Harassment Policies	S/No.	IPs with Sexual Harassment Policies
1	Hohoe Municipal Assembly	36	Agona East District Assembly
2	National Communication Authority	37	National Board for Small Scale Industry
3	Ketu South Municipal Assembly	38	Gomoa Central District Assembly
4	Abura/Asebu/Kwamankese District Assembly	39	Bank of Ghana
5	Sunyani West District Assembly	40	Ahafo Ano North Municipal – Tepa
6	South Dayi District Assembly	41	Sene East District Assembly
7	Ministry of Finance	42	Public Service Commission
8	Prestea-Huni-Valley Municipal Assembly	43	Gomoa East District Assembly
9	Office of the Head of Civil Service	44	Nkwanta North District Assembly
10	Zabzugu District Assembly	45	Kintampo South District Assembly
11	Ministry of Works and Housing	46	Atebubu Amanten Municipal Assembly
12	Jaman South Municipal Assembly - Drobo	47	Ekumfi District Assembly- Essarkir
13	Asunafo South District Assembly	48	Ministry of Lands & Natural Resources
14	Social Security and National Insurance Trust	49	Wa Municipal Assembly – Wa
15	Ministry of Transport	50	Volta River Authority
16	Kpandai District Assembly	51	Fair Wages and Salaries Commission
17	Ghana National Ambulance Service	52	Berekum East Municipal Assembly
18	Assin Fosu Municipal Assembly	53	Kassena Nankana Municipal Assembly
19	Regional Coordinating Council-Wa	54	Tempene District Assembly
20	Dafiama Bussie Issa District Assembly	55	Sekyerere Afram Plains District Assembly- Drobonso
21	Jaman North District Assembly – Drobo	56	Registrar-General's Department
22	Internal Audit Agency	57	Ayawaso East Municipal Assembly-Nima
23	Ghana Export Promotion Authority	58	Krachi East Municipal Assembly
24	Pru East District Assembly – Yeji	59	West Mamprusi Municipal Assembly
25	Weija-Gbawe Municipal Assembly- Weija	60	Kwame Nkrumah University of Science & Technology
26	Bawku West District Assembly	61	Creative Storm Network
27	Dormaa Central Municipal Assembly	62	Kpone Katamanso Municipal Assembly
28	Gomoa West District Assembly	63	Office of the Head of Local Government
29	Sekondi Takoradi Metropolitan Assembly	64	Centre for Democratic Development
30	Office of the Senior Minister	65	Economic and Organised Crime Office
31	LeadAfrique International	66	Krachie West District Assembly
32	Kpando Municipal Assembly	67	National Vocational Training Institute
33	Komenda-Edina-Eguafo Abrim Municipal Assembly	68	Public Service Commission
34	Amenfi Central Assembly	69	Ministry of Fisheries and Aqua-Culture Development
35	Ministry of Gender, Children & Social Protection		



