



REPUBLIC OF GHANA

NATIONAL ANTI-CORRUPTION ACTION PLAN (NACAP)

(2012-2021)

DECEMBER 20, 2011

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I. LIST OF ACRONYMS

AC	Anti-Corruption
AG	Attorney General
AGI	Association of Ghana Industries
AuG	Auditor General
AML	Anti-Money Laundering
APRM	African Peer Review Mechanism
APNAC	African Parliamentarians Network Against Corruption
ARIC	Audit Report Implementation Committee
AUCAC	African Union Convention on Preventing and Combating Corruption
CDD	Centre for Democratic Development
CEPS	Customs, Excise and Preventive Service
CEO	Chief Executive Officer
CEPIL	Center for Public Interest Law
CFT	Combating the Financing of Terrorism
CHRAJ	Commission on Human Rights and Administrative Justice
C&AGD	Controller & Accountant General's Department
CPI	Corruption Perception Index
CSPIP	Civil Service Performance Improvement Programme
CSOs	Civil Society Organizations
DAC	Development Assistance Committee
DANIDA	Danish International Development Cooperation
DfID	Department for International Development (United Kingdom)
DGP	Democratic Governance Programme
DNFBP	Designated Non-Financial Business and Professions
DPP	Director of Public Prosecutions
DTRD	Domestic Tax Revenue Division
EITI	Extractive Industries Transparency Initiative
ECOWAS	Economic Community of West African States
EOCO	Economic and Organised Crime Office
EU	European Union
FATF	Financial Action Task Force
FIC	Financial Intelligence Centre
FIU	Financial Intelligence Unit
FLEG-T	Forest Law Enforcement Governance Trade
FWC	Fair Wages Commission
GACC	Ghana Anti-Corruption Coalition

GBA	Ghana Bar Association
GCNet	Ghana Community Network
GDP	Gross Domestic Product
GEA	Ghana Employer Association
GIABA	Intergovernmental Action Group against Money Laundering in West Africa
GII	Ghana Integrity Initiative
GIFMIS	Ghana Integrated Financial Management System
GNCCI	Ghana National Chamber of Commerce and Industry
GPRS	Ghana Poverty Reduction Strategy
GRA	Ghana Revenue Authority
GREDA	Ghana Real Estate Developers Association
GSGDA	Ghana Shared Growth and Development Agenda
GTV	Ghana Television
GiZ	Gesellschaft für Technische Zusammenarbeit
IRS	Internal Revenue Service
IAA	Internal Audit Agency
IDEG	Institute of Democratic Governance
IoD	Ghana Institute of Directors
IMF	International Monetary Fund
ISODEC	Integrated Social Development Centre
JUSAG	Judicial Service Staff Association of Ghana
LRC	Legal Resources Centre
MDA	Ministries, Departments and Agencies
MDGs	Millennium Development Goals
ML	Money Laundering
MLG	Ministry of Local Government
MOE	Ministry of Education
MOFEP	Ministry of Finance and Economic Planning
MMDAs	Metropolitan, Municipal and District Assemblies
MoU	Memorandum of Understanding
MP	Member of Parliament
MUSIGA	Musicians Association of Ghana
MLG&RD	Ministry of Local Government and Rural Development
NACAP	National Anti-Corruption Action Plan
NACS	National Anti-Corruption Strategy
NAFTI	National Film and Television Institute
NALAG	National Association of Local Government
NAPSR	National Public Sector Reform
NEPAD	New Partnership for African Development
NCC	National Commission on Culture
NGO	Non-Governmental Organisation

NGP	National Governance Programme
NHIS	National Health Insurance Scheme
NPP	New Patriotic Party
NDC	National Democratic Congress
NIRP	National Institutional Reform Programme
NVTI	National Vocational Training Institute
OECD	Organisation for Economic Co-operation and Development
PAC	Public Accounts Committee of Parliament
PARDIC	Public Administration Restructuring and Decentralisation Implementation Committee
PAMSCAD	Programme of Action to Mitigate the Social Cost of Adjustment
PETS	Public Expenditure Tracking Survey
PFM	Public Financial Management
POA	Programme of Action
PIPS	Police Intelligence and Professional Standards Bureau
PSRP	Public Sector Reform Programme
RAGB	Revenue Agencies Governing Board
RWI	Revenue Watch Institute
SAP	Structural Adjustment Programme
SFO	Serious Fraud Office
STR	Suspicious Transaction Report
TF	Terrorists Financing
TI	Transparency International
TOR	Terms of Reference
UNCAC	United Nations Convention Against Corruption
UNODC	United Nations Office on Drugs and Crime
UNDP	United Nations Development Programme
UK	United Kingdom
VATS	Value Added Tax Service

II. FOREWORD

Corruption is an insidious plague that has a wide range of corrosive effects on societies. It undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish. It hampers efforts to alleviate poverty, undermines political stability and economic growth and diminishes the country's attractiveness for investment.

The Ghanaian society, recognising the negative impacts of corruption has, over the years, undertaken various policies and measures to control it. It established legal and institutional mechanisms, pursued sound economic and public sector reforms and strengthened the country's financial management systems. In 1998, the country organised the first National Integrity Conference that made significant proposals to tackle corruption and build integrity. Significant developments have taken place since that Conference. The country has since continued to strengthen the legal and institutional framework for fighting corruption and lifted her economic and public sector reforms to a higher pedestal and begun rationalising the remuneration structure of the public service.

The Second National Conference on Integrity was organised in October 2011. The Conference enabled anti-corruption practitioners, government, parliamentarians, civil society, the private sector and development partners to take stock of efforts to combat corruption and build a robust ethics infrastructure for the country. An overview of developments in the country's legal and institutional anti-corruption framework was given and the challenges that lie ahead carefully analysed. The Conference discussed, evaluated and validated the Draft National Anti-Corruption Action Plan (NACAP).

The country has made significant progress with the introduction and implementation of the various anti-corruption measures but there are still challenges. The adoption of a strategy that transcends political boundaries and tackles corruption holistically through prevention, education and enforcement is necessary.

The National Anti-Corruption Action Plan is an unqualified contribution to the fight against corruption and the promotion of national development. It contains

strategic action plans identified and agreed upon by stakeholders, including the private sector, during nationwide consultations. The greatest strength of the NACAP is that it is to be directly integrated into national development planning, making the plan an integral part of the regular annual activities of public institutions including the Ministries, Departments and Agencies (MDAs).

The control of corruption in Ghana should be the responsibility of each citizen. By this contribution, citizens are given the opportunity to join hands and tackle corruption in the country in order to secure and sustain the nation's development.

Chairman

Richard A. Quayson
National Working Group

III. ACKNOWLEDGEMENT

Preparing the National Anti-Corruption Action Plan (NACAP) has been a challenging but enriching experience. The CHRAJ, which coordinated and provided logistics support for the development of the NACAP, note with appreciation the contributions made by institutions, organisations and individuals at the national, regional and district levels, without which the successful completion of the NACAP would not have been possible.

We would like to acknowledge the dedication and commitment of the Working Group (WG) inaugurated by the Vice President, H.E. John Dramani Mahama, on 9th December 2009, which consist of the following: Mr. Emile Francis Short (Former Chair); Mr. Richard A. Quayson (Chair); Mr. Charles Ayamdoo (Secretary); Mr. Joseph Whittal; Dr. Nicholas Amponsah; Mr. Albert Haligah; Hon. Emmanuel Bandua; Hon. Ambrose Dery; Mr. Justice A. Y. Tsar; Mr. Jonathan Azasoo; Ms. Alice Amedkudzi; Mrs. Janet Fofie; Mr. David Pedley; Ms. Vibeke Gram Mortensen; Dr. Cheryl Gopaul; Mr. Vitus Azeem; Mrs. Florence Dennis; Prof. E. Gyimah-Boadi; Mr. Daniel Batidam; Prof. Ken Agyeman Attafuah; Prof. Miranda Greenstreet; Mrs. Estelle Appiah; Mr. Matthew Amponsah and, Mrs. Mangowa A. Ghanney.

The WG which led the process to develop the NACAP, laboured for almost two years spending countless hours in research, meetings and other activities to develop the much needed Anti-Corruption Plan for the country.

We recognize and acknowledge the contribution that the IDLgroup made in the development of the NACAP.

The Kenya National Anti-Corruption Plan, Sierra Leonean Anti-Corruption Strategy and the National Anti-Corruption Strategy and Action Plan of Tanzanian provided useful information in the development of the NACAP.

We are indeed grateful to DANIDA, without whose funding support NACAP would not have seen the light of day.

1.0. INTRODUCTION

Corruption has been a major bane to Ghana's socio-economic and political development since independence in 1957. There is general acknowledgment of the multi-dimensional character of the problem, as well as broad societal recognition that corruption undermines good governance and the rule of law, and erodes public confidence in the merits and rewards system. Corruption is also understood to foster public sector incompetence and ineptitude, to debase public morality, to promote and sustain inefficient service delivery, to perpetuate poverty and, ultimately, to entrench underdevelopment.

Profile of Ghana's Anti-Corruption Strategies

Over the years, recognition of the widespread nature of corruption and its adverse impact on Ghanaian society has produced a wide array of policies and measures aimed at combating the phenomenon. Since independence, national anti-corruption strategies have included, among other things, the following:

- (a) embarking on moralising crusades by enlisting the help of religious and community leaders to exhort citizens to uphold the values of integrity and to manifest high moral ethics in their personal lives;
- (b) public execution of persons for corruption;
- (c) passage of draconian decrees that included the imposition of long custodial penalties;
- (d) confiscation of properties found or believed to have been corruptly acquired by public office holders;
- (e) declaration of a policy of zero tolerance for corruption;
- (f) strengthening the nation's anti-corruption legislative framework through the passage of several anti-corruption laws;
- (g) embarking on public sector and financial management reforms; and
- (h) strengthening national anti-corruption institutions such as the Ghana Police Service, Commission on Human Rights and Administrative Justice (CHRAJ) and the erstwhile Serious Fraud Office (SFO).

Action against corruption intensified over the last decade with the development of several anti-corruption initiatives, including institutional reforms.

The foregoing measures also harmonised with emerging international initiatives to fight corruption, including the world community's adoption of the United Nations Convention Against Corruption (UNCAC) in 2003. The African Union (AU) Convention Against Corruption 2005 and the ECOWAS Protocol on the Fight Against Corruption (ECOWAS Protocol) were adopted at the regional and sub-regional levels respectively. Ghana ratified both the UNCAC and the AU Convention in 2005, and the ECOWAS Protocol in 2003.

Even so, a number of studies continue to indicate that corruption persists in Ghana¹, with serious consequences for the nation's development. In the face of growing public concern about the scale of corruption and its impact on society, however, there is equally growing recognition that corruption can and must be effectively tackled through a holistic and comprehensive approach that builds on lessons from previous anti-corruption measures and integrates new perspectives, methods and tools. There is a growing consensus that the new approach requires the development and implementation of a well-articulated national anti-corruption strategic plan designed with the active participation of the citizenry and their full and sustained involvement in its implementation. To succeed, secure and sustain the nation's development, the new anti-corruption approach demands manifest political will from the nation's political elite, as well as multi-partisan commitment that transcends political leadership competitions.

Development of the National Anti-Corruption Action Plan

Throughout the world, it is now widely acknowledged that fighting corruption is a complex undertaking requiring the development and implementation of a comprehensive National Anti-Corruption Action Plan (NACAP) which offers a framework to effectively mobilise broad public support and resources for anti-corruption activities in a focused and sustained fashion. A NACAP must also aim at promoting and mainstreaming the values of integrity, transparency and accountability in all sectors of society and effectively sanction corruption. The development of a (NACAP) signals a country's determination to control corruption holistically.

This document, ***The National Anti-Corruption Action Plan (2012–2021)***, constitutes Ghana's national framework to drive anti-corruption activities for the

¹For instance, the Governance and Corruption Survey conducted by the Ghana Centre for Democracy and Development (CDD Ghana) in 2000 found that 75% of the Ghanaian households surveyed regarded corruption as a serious national problem; 59% of households saw corruption as a major problem in the private sector; and 86% saw it as a major problem in the public sector (CDD-Ghana, 2000). A later survey in 2005 conducted by the Ghana Integrity Initiative (GII) also indicated that Ghanaians perceived corruption as equally serious, with 92.5% of urban households in Southern Ghana citing corruption as prevalent in the country while 90% of those surveyed considered it a serious problem (GII, 2005).

next 10 years. The development of the NACAP is an unqualified contribution to the fight against corruption and the promotion of national development. It contains strategic action plans identified and agreed upon by stakeholders during nationwide consultations. The greatest strength of the NACAP is that its action plans are directly integrated into national development planning, making the plans an integral part of the regular annual activities of public institutions including the Ministries, Departments and Agencies (MDAs). The NACAP also covers the private sector.

Formulation of the NACAP

The formulation of the NACAP was facilitated by a group of experts and anti-corruption practitioners constituted into a Working Group (WG). The WG comprised representatives from the following institutions and organisations:

- Commission on Human Rights and Administrative Justice (CHRAJ);
- Office of the President;
- Parliament of Ghana;
- Judicial Service of Ghana;
- Attorney-General's Department;
- National Development Planning Commission;
- Public Services Commission;
- Ministry of Finance and Economic Planning;
- Africa Peer Review mechanism (APRM) Economic and Organized Crime Office
- Ghana Integrity Initiative;
- Ghana Anti-Corruption Coalition;
- Ghana Centre for Democratic Development;
- The Justice & Human Rights Institute;
- African Parliamentarians Network Against Corruption (APNAC-Africa);
- Development Partners:
 - (a) Danish International Development Agency (DANIDA);
 - (b) Department for International Development (DFID), and
 - (c) Canadian International Development Agency (CIDA).

The CHRAJ provided coordination and logistics support to the WG.

Arrangement of Sections

The NACAP comprises seven key components or parts. The "Introduction" examines corruption in the global and national contexts. It also outlines the

methodology employed in formulating the NACAP, its scope, role and the key assumptions underlying it. The second part, “Corruption in Ghana”, discusses the state of corruption in the country, drawing from various reports and studies on corruption. The section also examines the causes and effects of corruption in Ghana. The relationship between gender and corruption is explored, and measures adopted to control corruption in the country are also closely examined. Part two ends with a profile of the “Key Issues” which the NACAP seeks to address.

Part Three covers the “Vision, Mission and the Strategic Objectives” of the NACAP, whilst Part Four deals with the key elements of NACAP. During the formulation stage, key stakeholders jointly identified their roles in the implementation of the NACAP. These have been presented in Part Five. Strategies to monitor the implementation of the NACAP are captured in Part Six. Finally, the activities to be pursued under the NACAP are presented in a matrix format contained in an Appendix which forms Part Seven.

1.1. Global Context

In recent times, corruption has become a major issue of concern in the international community because of its corrosive impact on economic growth, human rights and poverty reduction². Considerable research has been conducted on the subject of corruption and its impact on development. The World Bank has estimated that each year, over \$1 billion is paid in bribes around the world, enriching the corrupt and robbing generations of the future. Each act of corruption contributes to global poverty, obstructs development and drives away investment³.

A study by the International Monetary Fund (IMF) indicates that corruption can reduce a country's Gross Domestic Product (GDP) by more than 0.5 per cent⁴. Similarly, the European Bank for Reconstruction and Development acknowledges that corruption weakens the state's ability to gain consent for, and enforce compliance with, rules and institutions by undermining the public's trust⁵. More recently, the IMF emphasised the need to help countries ensure the rule of law, improve the efficiency and accountability of their public sectors, and tackle corruption⁶

² UNDP Anti-Corruption Practice Note, 2004

³ World Bank, 2004. The Cost of Corruption, WB, Washington DC

⁴ International Monetary Fund., Also see Navil Mansur CHOWDHURY (2007). An Empirical Analysis Of Selected Factors Affecting Corruption In The Asia-Pacific Region

⁵ European Bank for Reconstruction and Development, (1998). Transition Report, 1998. London, 1998

⁶ IMF (2005). The IMF's Approach to Promoting Good Governance and Combating Corruption: A Guide. IMF, Washington DC

A report issued in 2005 by the Commission for Africa established by then British Prime Minister Tony Blair noted that “weak governance has blighted the development of many parts of Africa to date”. The report further noted that weak governance usually results in bad government policies and the creation of an economic and political climate that discourages people from investing. Furthermore, corrupt and bureaucratic systems are not open to scrutiny and the beneficiaries are frequently not answerable to the public. The result is lack of accountability as well as the weakening of mechanisms aimed at ensuring that people’s voices are heard and human rights upheld. Typically, where corruption reigns, the oversight and accountability roles of Parliament, the media and the justice system are acutely undermined.

Evidence of increases or decreases in levels of corruption has also become a particularly visible means to illustrate a country’s developmental progress. A number of studies sponsored by the UNDP have established that corruption has an adverse impact on women, the environment and levels of investment⁷. The United Kingdom’s Department for International Development (DfID) argues that countries “most likely to succeed will have effective government, enlightened legislation, prudent budgeting and an efficient administration that responds to the needs of poor people”⁸

The unprecedented attention given to the subject of corruption is the result of increased awareness of the strong correlation found to exist between corruption and development. In his essay on “Corruption and the Challenges of National Development”, Ken Attafuah summarises the dire consequences of corruption as follows:

... [T]he cost of corruption is enormous, covering the loss of development funds, retardation of economic growth, flight of capital, and the inflation of administrative costs. Corruption also frequently results in loss of legitimacy and respect for legally-constituted authority by, among other things, undermining the integrity of the socio-legal foundations of that authority. It debases the moral fibre of a society by nibbling away at the core values that bond the society together... Corruption is decidedly dysfunctional to the maintenance of a just social order. It is heavy damper on motivation. It stifles initiative and creativity, demoralises the honest person ... violates the individual’s right to economic and social well-being ... It nourishes mediocrity and undermines the merit system of rewards, appointments and entitlements. ... Corruption generates

⁷UNDP, (1999).Fighting Corruption to Improve Governance. Washington DC

⁸DFID, (1997).Eliminating World Poverty. London, 1997, p.30

incompetence [by fostering] the appointment of the proverbial “square pegs in round holes”. Corruption engenders market inefficiencies, and fosters the deliberate creation of bottlenecks in the bureaucracy in order to further the ends of exploitation. In short, corruption is a hindrance to economic development and social advancement. ...”⁹

Higher levels of corruption are linked to lower levels of socio-economic development as well as higher levels of public sector inefficiency and underperformance. In the foreword to the UNCAC, United Nations Secretary-General, Kofi Annan, states that:

“Corruption is an insidious plague that has a wide range of corrosive effects on societies. It undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organized crime, terrorism and other threats to human security to flourish. This evil phenomenon is found in all countries—big and small, rich and poor—but it is in the developing world that its effects are most destructive. Corruption hurts the poor disproportionately by diverting funds intended for development, undermining a Government’s ability to provide basic services, feeding inequality and injustice and discouraging foreign aid and investment. Corruption is a key element in economic underperformance and a major obstacle to poverty alleviation and development”.

There has also been increased awareness of the linkages between corruption and serious organised transnational crime. Around the world, the opportunities brought by globalisation and technological advancements for legitimate business are also routinely exploited by criminals in aid of their nefarious enterprise.

Today, action against corruption is at its highest on the global agenda. Global efforts have led to the adoption of the following instruments and processes, among others:

- (a) *The UN Convention Against Corruption;*
- (b) *The African Union Convention on Preventing and Combating Corruption;*
- (c) *UN Convention Against Transnational Organized Crime;*
- (d) *UN Declaration Against Corruption and Bribery in the International Commercial Transactions;*
- (e) *International Code of Conduct for Public Officials;*

⁹Attafuah, Ken Agyeman (1999) “Corruption and the Challenges of National Development” *Governance* Vol. 099 No. 5 May 1999, Institute of Economic Affairs (IEA), Accra, Ghana

- (f) *OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;*
- (g) *Financial Action Task Force (FATF) 40+9 Recommendations, and*
- (a) *Establishment of ECOWAS Inter-Governmental Action Group against Money-Laundering in West Africa (GIABA)*

The UNCAC presents a common international framework to combat corruption. This singular Convention, together with the African Union Convention on Preventing and Combating Corruption, and the ECOWAS Protocol on the Fight Against Corruption, presents a set of time-tested and internationally-recognised principles to fight corruption effectively.

In addition to the foregoing, an increasing number of international instruments have been adopted to address leakages in resource management in extractive industries. These include the Extractive Industries Transparency Initiative (EITI), the Kimberly Process and the Forest Law Enforcement Governance Trade (FLEG-T). These instruments challenge the state's control of resources and service delivery via principles of accountability and transparency.

Recent regional initiatives have also helped to control corruption by promoting good governance. The African Governance Forum (AGF), a deliberative process that includes sub-Saharan African countries and their external partners, is an opportunity for regular dialogue and interaction on good governance. Indeed, the second meeting of the AGF took place in June 1998 in Ghana, with a focus on accountability and transparency. The Africa Development Bank (AFDB) has adopted governance and corruption as key performance factors of credit worthiness of African countries in processing applications for funding support. In addition, Benin, Botswana, Ethiopia, Ghana, Malawi, Mali, Mozambique, Senegal, South Africa, Tanzania and Uganda have adopted, under the auspices of the Global Coalition for Africa (GCA), a set of twenty-five anti-corruption principles for fighting corruption.

In response to the effects of money laundering on the development of the West African sub region, the Authority of Heads of State and Government of the Economic Community of West African States (ECOWAS) established the Inter-Governmental Action Group Against Money Laundering in West Africa (GIABA) to, among others, protect the national economies and the financial and banking systems of Member States against abuse, and the laundering of proceeds of crime and the financing of terrorism. GIABA is also to improve measures and intensify efforts to combat money laundering and terrorism financing in West Africa and strengthen co-operation amongst its members.

Corruption flourishes in societies characterised by weakened mechanisms of social control and limited self-discipline. With the attainment of independence in 1957, the nation experienced large scale withdrawal of the systems of controls and guardianship hitherto exercised by the colonial master over the public sector, few of the Africans who stepped into the shoes of the colonialists had the neutrality, impartiality and personal self-discipline in their relationship with and attitudes toward public resources, yet nearly all were strongly subject to demands of family members and friends for favours and largesse from the public purse which our cultural orientations prescribed and defined as legitimate.

Within these contexts, signs of grand and petty corruption began to emerge in the sectors of society, especially within the public sector, with those in top public management positions engaging in corrupt practices the most. In particular, recruitments, promotions, contracts and procurements became favourite sites of corruption. The term “greasing of the palm” became synonymous with bribe-giving.

Reports of rampant bribery and corruption, particularly between officials of the ruling Convention People’s Party (CPP) and top government officials, became common. The soldiers who subsequently overthrew the nation’s first President, Dr. Kwame Nkrumah, and his CPP Government on 24th February 1966 partly justified their action on the ground of combating corruption in the public sector.

In April 1969, the Head of State and Chairman of the National Liberation Council, Lt.-Gen. A. A. Ankrah, had to resign his post over a bribery case. One of the justifications proffered for the coup d’état that removed Prof. Kofi Abrefa Busia and his Progress Party (PP) Government from office was the drive to arrest corruption. Even so, corruption persisted in Ghana throughout the 1970s, with the term *kalabule* becoming its commonest referent.

The June 4th Uprising by the other ranks of the Ghana Armed Forces which led to the ousting of Gen. Fred William Kwasi Akuffo’s Supreme Military Council, as well as the subsequent “House Cleaning Exercise” initiated by the Armed Forces Revolutionary Council (AFRC) Government led by Flt. Lt. Jerry John Rawlings, were chiefly justified in the name of fighting corruption. Similarly, the coup makers who toppled the People’s National Party (PNP) Government of Dr. Hilla Limann on 31st December 1981 accused the ousted government of corruption and, like all their military predecessors, confiscated the assets of many civilian politicians in the name of fighting corruption.

In short, combating corruption has been a major element in the repertoire of justifications for the overthrow of governments in Ghana, both constitutional and

unconstitutional. Public executions by firing squad and other draconian penalties, such as the imposition of lengthy custodial sentences and the confiscation of properties, have been some of the stringent corruption control measures implemented in Ghana. The manifestoes of political parties include promises to fight corruption, with each party pledging on rally platforms to fight corruption better than their opponents. In spite of these developments, corruption remains a reality in this country.

Today, Ghanaians generally acknowledge the importance of mainstreaming the fight against corruption in national development planning. This realisation and commitment is articulated in the 4th Republican Constitution (1992). Article 35(8) of Constitution specifically provides that *“the State shall take steps to eradicate corrupt practices and the abuse of power.”*

The Constitution also espouses equality of opportunity, justice, probity and accountability and provides a *Code of Conduct for Public Officers*. Found in Chapter 24 of the Constitution (1992), the *Code of Conduct for Public Officers* provides, among others, that a public officer shall not put himself or herself in a position where his or her personal interest conflict or are likely to conflict with the performance of an official function. The Constitution also requires certain categories of public officers to periodically declare their assets and liabilities.

Furthermore, by virtue of Article 286(7) of the Constitution, some public officers are enjoined to take and subscribe to an appropriate Oath of Office. In general, these officers pledge, among other things, to:

- bear true faith and allegiance to the Republic of Ghana;
- uphold the sovereignty and integrity of Ghana;
- preserve, protect and defend the Constitution;
- dedicate themselves to the service and well-being of the people of the Republic of Ghana;
- do right to all manner of persons;
- truly and faithfully perform the functions of public office without fear or favour; affection or ill-will; and
- freely give counsel and advice for the good management of the public affairs of the country.

Institutional Mechanisms for Fighting Corruption

In addition to the foregoing, a number of constitutional and statutory bodies are vested with the power to fight corruption. Besides the traditional law enforcement agencies such as the Ghana Police Service and the Bureau of National Investigations, the Commission on Human Rights and Administrative Justice (CHRAJ), the Economic and Organised Crime Office (EOCO), and the Financial Intelligence Centre are the foremost anti-corruption institutions in Ghana.

The Commission on Human Rights and Administrative Justice

The CHRAJ was established in October 1993 by the *Commission on Human Rights and Administrative Justice Act, (Act 456)*. Among the principal functions of the CHRAJ is the investigation of “all instances of alleged or suspected corruption and the misappropriation of public moneys by officials”. In addition, by virtue of Articles 218(b) and 287 (1) of the Constitution, the CHRAJ is mandated to investigate “complaints of corruption” as well as non-compliance with the provisions of the *Code of Conduct for Public officers*.

The Economic and Organised Crime Office

The Economic and Organised Crime Office (EOCO)¹⁰ was established with the object of preventing and detecting organised crime and facilitating the confiscation of proceeds of crime. In order to achieve its objectives, the EOCO, among other functions, is to:

- (a) Investigate and on the authority of the Attorney-General prosecute serious offences involving: financial or economic loss to the Republic or any state entity or institution in which the state has financial interest; money-laundering; human trafficking; prohibited cyber activity; and other serious offences; and
- (b) recover proceeds of crime.

The Financial Intelligence Centre

The Financial Intelligence Centre was established in the Anti-Money Laundering Act, 2008 (Act 769) and started operation in January 2010. The function of the FIC is to receive suspicions transaction reports, disseminate financial intelligence and other information related to money laundering and terrorist financing to relevant

¹⁰The EOCO was, until July 2010, the Serious Fraud Office. The change was effected through the enactment of the *Economic and Organized Crime Office Act, 2010, (Act 804)* by Parliament in 2010.

institutions for further action to combat corruption and deal with the illicit acquisition of money.

1.2. NACAP Formulation Methodology

The formulation of the NACAP benefitted from a variety of approaches. In order to enlist the support of relevant stakeholders in the development of the NACAP and related activities, broad confidence-building and partnership-fostering measures were undertaken. These included the establishment of a Working Group and consultations with government, MDAs, Metropolitan, Municipal and District Assemblies (MMDAs), and other public institutions, private sector, civil society organisations and the general public. The members of the Working Group were drawn from government, anti-corruption agencies, civil society, private sector, media, other key accountability institutions, experts and development partners.

Three primary methods of consultation were employed. These were:

- (a) conducting interviews with key informants;
- (b) holding Focus Group Discussions (FGDs) with stakeholders, and
- (c) staging a Regional Forum in each of the ten (10) regional capitals in Ghana.

The informant interviews and FGDs were conducted with key Government institutions, Members of Parliament (MPs), civil society organisations (CSOs) and representatives of the private sector at the national, regional and district levels. Organising a public forum in each capital enabled stakeholders at the respective regional and district levels to make input into the development of the NACAP; it also helped to generate local ownership of the NACAP and its key processes. Given the disproportionate negative impact of corruption on women, children and other “equity-seeking groups” such as persons with disability and other vulnerable groups, specific attention was paid to issues of *gender* and fair representation of women in selecting participants for all the activities leading to the development of NACAP.

The general public was also given the opportunity to provide inputs into the NACAP process via the website of the Ghana Anti-Corruption Coalition (GACC). To enlist public support for the project and to popularize it, the media was effectively used to educate citizens on the ills of corruption and to publicise the processes and activities leading to the development of the NACAP.

Finally, the draft NACAP document was validated at a National Conference on Integrity held in October 2011 in Accra. The conference brought together over 140 participants from local stakeholders such as government, independent constitutional bodies, civil society (including women’s groups), Ghana’s

development partners, international anti-corruption organisations and sections of the general public.

In short, the broad consultative approach brought together state and non-state actors, both local and international, with the requisite mandate, experience, expertise and interest to help in developing a well-considered NACAP. Ultimately, the effective implementation of the NACAP should result in enhanced levels of integrity, reduced corruption, improved economic performance, and accelerated development of Ghana.

1.3. The Role and Scope of NACAP

As noted earlier, corruption remains endemic in Ghana despite the wide array of measures pursued in the past to control the problem. Amidst growing perceptions of corruption, the public has become increasingly cynical about the official commitment to effectively tackle the menace. Above all, confidence in the integrity of public office is fast eroding.

The major causes of the failure of past anti-corruption strategies include the following:

- inadequate appreciation of the complex mix of factors implicated in corruption;
- lack of public participation in the development and implementation of the anti-corruption measures;
- failure to foster local ownership in the formulation and implementation of the various strategies;
- lack of effective and sustained coordination in the implementation of anti-corruption measures; and
- lackadaisical government commitment to, and limited support for, the implementation of anti-corruption strategies.

The development of the NACAP has taken account of the limitations and shortcomings that characterised previous anti-corruption strategies and spelt their failure. As formulated, the NACAP integrates anti-corruption measures into the programmes and activities of public sector organisations, particularly MDAs and MMDAs, and key actors in the private sector.

The NACAP enables collective action and sustained co-ordination of efforts, as well as the judicious application of resources of stakeholders to combat corruption. It constitutes the benchmark to assess the performance of stakeholders, especially government, in the fight against corruption. The NACAP will therefore guide

stakeholders in their roles and responsibilities to combat corruption. The NACAP seeks to mobilise national efforts to ensure the effective control of corruption. It does not aim at blaming any particular sector for corruption in Ghana.

The scope of the NACAP goes beyond controlling corruption in the public sector, it targets the private sector and embraces the activities of state and non-state actors regardless of gender, age, local or international status. The NACAP adopts a long-term strategic perspective and utilises a three-prong approach to the fight against corruption, namely:

- (a) prevention;
- (b) education, and
- (c) investigation and enforcement.

1.4. Key Risks and Assumptions

The key risks and assumptions of the NACAP include:

- (a) Successive governments will garner and maintain political will for the effective implementation of the NACAP over the 10-year period and beyond;
- (b) Democratic governance and the rule of law will continue to be strengthened through free, fair and credible elections in the country;
- (c) There will be sustained commitment to, and ownership of, the NACAP by each Ghanaian and all other stakeholders in Ghana's developmental process;
- (d) The state will make substantial investment in the implementation of anti-corruption measures;
- (e) Funds will be mobilised and made available in time for the implementation of planned activities, and
- (f) Acceptance, cooperation and participation of stakeholders.

2.0. CORRUPTION IN GHANA

2.1. Defining Corruption

Corruption has a long history in Ghana. Section 239 of the *Criminal Offences Act (Act 29) of 1960*¹¹, proscribes corruption. Parliament's decision in 1960 to criminalize corruption is sufficient evidence of the reality and magnitude of corrupt practices in Ghanaian society to warrant their proscription via legislative enactment. Corruption is ubiquitous and occurs in both the private and public spheres. Its effects are particularly odious within the public sector where public officials, by virtue of their positions as fiduciaries of the people, can abuse the discretionary power entrusted to them for personal gain, at the expense of the State. The situation can be truly grave when officials are entrusted with the power to control the public purse¹² without sufficient measures to ensure effective accountability.

Although Act 29 makes corruption a misdemeanour, a person guilty of corruption can serve up to 25 years in jail. Specifically, section 239 of Act 29 provides for the offence of "Corruption, of and by Public Officer, or Juror" and states as follows:

(1)"A public officer or juror who commits corruption, or wilful oppression, or extortion, in respect of the duties of office, commits a misdemeanour".

(2)"A person who corrupts any other person in respect of a duty as a public officer or juror commits a misdemeanour".

Section 240 explains corruption *by a public officer*, while Section 241 explains corruption *of public officer*. Section 240 provides that:

"A public officer, juror, or voter is guilty of corruption in respect of the duties of office or the vote, if the public officer directly or indirectly agrees or offers

¹¹ Until 16th April 2007, this law was known as the *Criminal Code 1960 (Act 29)*. The change in name was effected by the statute law revision exercise. The *Criminal Offences Act, 1960 (Act 29)* is a comprehensive law that defines most crimes in Ghana and their prescribed punishments.

¹² Global Integrity: An Investigative Report Tracking Corruption, Openness and Accountability in 25 Countries

to permit the conduct of that person as officer, juror, or voter to be influenced by the gift, promise, or prospect of any valuable consideration to be received by that person or by any other person, from any other person”.

Corruption of Public Officer is explained as follows:

“A person commits the criminal offence of corrupting a public officer, juror, or voter in respect of the duties of office or in respect of the vote, if that person endeavours directly or indirectly to influence the conduct of the public officer, juror, or voter in respect of the duties of office or in respect of the vote, by the gift, promise, or prospect of any valuable consideration to be received by the public officer, juror, or voter, or by any other person, from any person”

Thus, corruption under Act 29 is limited to bribery in its various forms:

- (a) bribery of a public officer;
- (b) bribery by a public officer;
- (c) receiving a bribe before doing an act; and
- (d) promise of a bribe.

The scope of corruption covered under the Act is severely limited compared with the scope of corruption in both the United Nations Convention Against Corruption (UNCAC) and the African Union Convention on Preventing and Combating Corruption (AUCAC), which Ghana ratified in December 2005.

For the purpose of the NACAP, corruption is defined as **“the misuse of entrusted power for private gain”**. So defined, corruption includes bribery, embezzlement, misappropriation, trading in influence, abuse of office, abuse of power, illicit enrichment, laundering of proceeds of crime, concealment, obstruction of justice, patronage, nepotism, and conflict of interest.

2.2. State of Corruption

Corruption is endemic in Ghana and permeates every sector of the economy. A key conclusion of the African Peer Review Mechanism (APRM) Report of 2005 was that corruption remains prevalent in all spheres of Ghanaian society. Similarly, the 2000 *Ghana Governance and Corruption Survey* of the Centre for Democracy and Development (CDD-Ghana) found that 75% of the households surveyed regarded corruption as a serious national problem; 59% of households saw corruption as a major problem in the private sector; while 86% saw it as a major problem in the public sector. A later survey conducted in 2005 by the Ghana Integrity Initiative (GII) found that Ghanaians perceived corruption as serious. The survey also

indicated that 92.5% of urban households in southern Ghana believed corruption to be prevalent in Ghana and 90% considered corruption to be a serious problem.

The most recent survey on corruption in Ghana to date was conducted in 2009 by Transparency International. The results of the *Transparency International Barometer Survey* showed that 42% of all households in Ghana paid a bribe in the last year.¹³ Reports on the *State of Corruption in Ghana* issued annually by CHRAJ have repeatedly indicated that corruption is the most troublesome obstacle to Ghana's development. The reports also highlight various types of "corruption" including bribery, embezzlement, misappropriation of public monies, fraud, conflict of interest and abuse of office, abuse of the procurement processes, illegal acquisition of State lands and cyber fraud, among others.

In April 2009, GIABA evaluated the AML/CFT regime in Ghana and the Mutual Evaluation Report (MER) on Ghana was adopted by the GIABA Plenary in November 2009. The MER on Ghana revealed a number of significant deficiencies including: ineffective application of powers by appropriate authorities to investigate, detect, seize and confiscate proceeds of crime; inconsistency in the implementation of the currency declaration system across designated entry and exit points due to non-standardisation of the reporting format and the lack of awareness of roles by customs officials and lack of comprehensive preventive measures by financial institutions and designated non-financial businesses and professions (DNFBPs) in the areas of Customer Due Diligence (CDD), Politically Exposed Persons (PEPs), application of risk-based approach to AML/CFT compliance functions and the monitoring of cross-border and domestic wire transfers.

Furthermore, the work and annual reports of the Public Accounts Committee of Parliament have drawn attention to widespread occurrences of misappropriation and misapplication of public funds, unauthorised payments, waste, misuse and gross mismanagement of funds in public administration. There are also signs that tax evasion and money laundering are significant and growing problems in Ghana. A Judicial Monitoring Exercise conducted by GII in 2007 in Accra, Tema and Kumasi indicated that corruption is very rife in the Judicial Service.¹⁴ In fact, every sector of the country faces one form of corruption or the other.

Ghanaian society is also saddled with "quiet corruption" which takes the form of absenteeism, habitual lateness for work, leakage of funds, imposition of informal

¹³ The TI Corruption Barometer (2009)

¹⁴ GII Judicial Corruption Monitoring Exercise (August 2007)

user fees, petty thievery (stealing of monies and office supplies) and diversion of supplies by public officers. The report of a study released by the World Bank in 2010 entitled, *Africa Development Indicators: Silent and Lethal, How Quiet Corruption Undermines Africa's Development Efforts*¹⁵, indicates that leakage of resources in the provision of health care in Ghana is huge. For instance, in 2000, leakages of non-salary cash flows in health care delivery system in Ghana amounted to 80%, which was only next to Chad which recorded 99%.

A Public Expenditure Tracking Survey (PETS) conducted in 2000 indicated that there were large-scale leakages of 80% funds in the health care sector alone.¹⁶ A Send Foundation Ghana report issued in 2010 on the National Health Insurance Scheme (NHIS) for the period 2004-2008 reported widespread abuses including cheating, over-invoicing by some service providers, fraud, irrational prescriptions by health professionals, and outright impersonation.

Other reports show that the education sector also suffers from quiet corruption. In 2010, the GII reported irregularities in the use of primary school resources, absenteeism and other malpractices in relation to primary education¹⁷. A PETS results in 2007 showed that there were various degrees of leakages at almost all levels of the educational system¹⁸. The survey found that leakages in basic and second cycle schools stood at 52% and 48% respectively. A report from the Auditor General's Department (AuG) has revealed serious irregularities and misappropriations in the education sector including non-collection of outstanding debt, procurement/contract irregularities, unsupported payments, store irregularities, unearned salaries, misappropriation of school funds, and failure to collect or remit taxes¹⁹.

Corruption is also rife in the private sector. Almost two-thirds of private companies pay gifts to secure Government contracts. A World Bank 2007 Enterprise Survey found that 39% of firms make informal payments to public officials to get things done, 23% to get an operating license, 18% in gifts for meetings with tax officials and 61% to secure government contracts.

¹⁵The World Bank (2010) *Africa Development Indicators: Silent and Lethal, How Quiet Corruption Undermines Africa's Development Efforts*. The World Bank used the term "quiet corruption" to indicate "...various types of malpractice of frontline providers (teachers, doctors, inspectors, and other government representatives) that do not involve monetary exchange.

¹⁶ MOFEP (2007) PETS in Health and Education

¹⁷ GII Alert (March 2010)

¹⁸ MOFEP (2007) PETS in Health and Education

¹⁹ AuG (June 2007) Report on Pre-University Educational Institutions

Corruption in Ghana is largely nurtured and influenced by the patrimonial character of the society where informal relations, family connections and social reciprocity are reflected in levels of favouritism, cronyism and nepotism. Social and economic structures in Ghana exhibit a complex interplay between the traditional and the modern. The traditional social order is organised according to principles of kinship, community and reciprocity.²⁰ This creates strong patron-client relationships bound by a traditional sense of deference to leadership and an expectation that loyalty towards patrons will be rewarded through subsequent personal favours²¹. In this system, “the formal legal structures and institutions that prescribe the normative rules for gaining and exercising power may be publicly honoured but privately circumvented through *informal* institutions and arrangements that shape political behaviour and expectations, even though they may be publicly unacknowledged or even condemned”²². Cultural factors also play an important role in shaping our social and economic structures. The culture of gift-giving and gift-taking, used in our culture to cement social and economic relationships, is perceived to create conditions for corruption.

The patronage system also fundamentally influences the formal system and creates contradictions between how institutions are intended to operate in principle and how informal practices supplant formal structures in reality. As a result, public administration and political competition often appear to be driven more by personal ties than formal rules. Voting patterns are still somewhat influenced by traditional forms of identity such as family, clan, ethnic group or ethnic membership and policy-making is often dominated by the dispensing of favours rather than the promotion of the broader public good. The net result of this situation is the creation of an environment characterised by limited or inadequate commitment to change the *status quo* or to tackle the underlying causes of corruption.

The endemic nature of corruption in Ghana may become even more critical as oil revenues come online. While steps are being taken within the context of the *Extractive Industries Transparency Initiative* (EITI) arrangements to reduce the opportunities for corruption, key concerns remain around the issues of ensuring effective monitoring of the EITI arrangements, promoting budget transparency,

²⁰Yankah, K.(2008) *Cultural Influences on Governance*, in Ghana: Governance in the Fourth Republic, Ed. Baffour Agyeman-Duah, Tema: Digibooks.

²¹Afrobarometer Survey in Ghana (2009), CDD-Ghana

²²Attafuah, Kenneth Agyeman (2011) “*The State of Liberalism in Contemporary Ghana*”, Unpublished paper presented at the 2011 Friedrich Naumann-Stiftung Africa Meeting held in Accra, Ghana, March 23- 27, 2011, p. 6.

reducing conflict of interest, establishing an effective assets disclosure regime, and promoting corporate integrity generally. Indeed, the scant revenue transparency in Ghana has the potential to promote corruption in the oil and gas sector.²³

2.2.1. Causes of Corruption in Ghana

The causes of corruption in Ghana are many and varied. Prominent among them are institutional weaknesses, poor ethical standards including limited commitment to the values of integrity and self-discipline, skewed incentives structure, and insufficient enforcement of laws within a patrimonial social and political context. Other factors implicated in corruption are attitudes and social circumstances that make average people disregard or circumvent the law in Ghana. Indeed the CDD nation-wide survey conducted in 2000 lists the following as the other causes corruption: low salaries, culture of gift-giving, lack of effective incentive mechanism, and poor management practices in public organizations²⁴.

Weaknesses in institutional structures may result in the failure to implement and enforce policies and laws that could otherwise ensure accountability and transparency. In the context of weak law enforcement and limited accountability in Ghana, the opportunities for corruption are immense and the chances of being caught are rather minimal.

The following factors are also implicated in the causes of corruption in Ghana:

- (a) Lack of effective corruption reporting system
- (b) Absence of good record-keeping
- (c) Poor management practices in public institutions
- (d) Low levels of integrity

The Global Integrity Report on Ghana states that:

“Ghana’s corruption problem has deep roots in society and our political culture, where societal expectations of largesse and patronage from holders of public office combine with a culture of official impunity, low remuneration, and opacity and unregulated discretion in the use of public authority to produce a system that is hospitable to corruption...”²⁵

²³See www.revenuewatch.org

²⁴ WB/CDD., 2000. The Ghana Governance and Corruption Survey Evidence from Households, Enterprises and Public Officials, 2000

²⁵Global Integrity/The Center For Public Integrity (2004): An Investigative Report Tracking Corruption, Openness and Accountability In 25 Countries, p.7

A host of other factors nurture corruption in Ghana. These include nepotism and neo-patrimonialism, where wealth and power become interchangeable and the differentiation between the business world and the political spheres is less clear²⁶. Some public officers treat public resources as their personal property and distribute them to their families and cronies at will. Many public officers, after performing a public duty expect expressions of gratitude in material form from the persons on whose behalf they are appointed and paid to serve. The service recipient who fails to say “thank you” with a gift in cash or kind at the time of service, or who fails to give a hamper at Christmas, may in future receive poor quality service or suffer delay, a rebuke or outright denial of the service.

Corruption is rife where there is a minimal system of accountability and transparency, where salaries for public officers are extremely low, and where the remuneration and incentives package for different groups of workers or professionals are unbalanced and unfair, and where there is an inadequate incentive scheme to motivate and reward honesty. Corruption in Ghana has long been encouraged by outright impunity, non-enforcement of laws, and selective enforcement of laws and regulations against particular persons and groups. The failure to punish for corruption and economic crimes has also facilitated corrupt behaviour.

2.2.2. Effects of Corruption in Ghana

Corruption generally has serious negative consequences for the development of any nation. Corruption continues to exact a heavy toll on Ghana’s economy, society and politics, retarding national development. Padding of salaries or what is generally known as “ghost names” on the public pay roll alone, costs Ghana thirty billion Ghana cedis (¢30,000,000.000.00) annually. Corruption facilitates generalised disrespect for the law and disregard for the rule of law.

The following are among the documented effects of corruption on Ghanaian society:

- (a) Provision of poor quality services (in such areas as education, health, sanitation and electricity);
- (b) Undermining or weakening of institutions for democracy and good governance;
- (c) Loss of lives;
- (d) Abandonment of development projects;
- (e) Haphazard developments;

²⁶ Jean-Francois Medard, 2002. Corruption in neo-patrimonial States of Sub-Saharan Africa. In A.J. Heidenheimer and M. Johnston Eds Political Corruption: concepts and contexts. New Jersey, Transaction Publishers, 2002, pp. 379-403

- (f) Flight of capital;
- (g) Increased costs of business;
- (h) High cost of infrastructural development;
- (i) Destruction of merit-based competition;
- (j) Weakening of professionalism through production of the proverbial “square pegs in round holes”;
- (k) Destruction of the productive capacity and creativity of individuals (e.g. skilled and honest people remain unemployed); and
- (l) Facilitation of other criminal activities such as drug-trafficking, human-trafficking, terrorism, prostitution and money-laundering.

2.2.3. Measures to Control Corruption

As noted earlier, fighting corruption is one of the most significant challenges facing contemporary Ghanaian society. The criminalization of corruption in 1960 via the passage of the *Criminal Offences Act, 1960 (Act 29)* and the *Criminal and Other Offences (Procedure) Act, 1960 (Act 30)* signalled the nation’s resolve to confront the problem through the instrumentality of the criminal law. The *Criminal Procedure (Amendment) Act, 1965 (Act 261)* was subsequently passed to increase the penalty for corruption to a maximum of 25 years. This has been consolidated with Act 30 in the Laws of Ghana revised edition.

Measures to control corruption, thus, begun as soon it was seen to pose serious developmental challenges for the country. In the early 70s, a number of Commissions of Inquiry were set to investigate individuals and corporate bodies suspected of contributing to rampant corruption in the country. In the late 1970s to the early 1980s, Ghana resorted to the use of highly draconian laws and criminal prosecutions with a view to deterring corruption. The “house-cleaning exercise” and the related trial of numerous individuals before the “People’s Courts” during the short-lived reign of the Armed Forces Revolutionary Council (AFRC) in 1979 was billed to purge the nation of corruption.

The same goal underpinned many prosecutions before the Public Tribunals during the rule of the Provisional National Defence Council (PNDC) between 1982 and 1993. Wealthy businesspeople, former senior military officers who served in the National Redemption Council (NRC) and the Supreme Military Council (SMC) governments of the 1970s, as well as the Ministers of State, Members of Parliament and other government functionaries of the People’s National Party (PNP) were particularly targeted and sternly prosecuted for corruption during the two AFRC and PNDC eras.

During the two periods, various structures and institutions were also set up to deal with corruption. For example, the Citizens Vetting Committee, later renamed the Office of Revenue Commissioners, investigated persons whose lifestyles and expenditures were suspected to substantially exceed their known or declared incomes.

As noted earlier, Ghana's return to constitutional rule in January 1993 under the Fourth Republican Constitution of 1992 saw the systemisation of the nation's anti-corruption by, among other measures, investing the CHRAJ with the powers to investigate "all instances of alleged or suspected corruption, and the misappropriation of public moneys by officials". Since then, the development of a legal and institutional framework to fight corruption has intensified with the establishment of the SFO which was converted to the EOCO in 2010 with enhanced powers.

In 1998, the *Public Office Holders (Declaration of Assets and Disqualification) Act 1998 (Act 550)* was passed, repealing the *Public and Political Party Office Holders (Declaration of Assets and Eligibility) Law, 1992 (PNDCL 280)*. However, whereas PNDCL 280 required that assets and liabilities declared should be gazetted, *Act 550* does not provide for gazetting of the declarations.

Ghana also staged a National Integrity Workshop in October 1998 under the auspices of the CHRAJ. Organised under the theme, "Towards a Collective Plan of Action for the Creation of a National Integrity System", the workshop aimed to generate public awareness of the social and economic costs of corruption, foster the creation of a positive and non-partisan approach towards the combat of corruption, secure the requisite political will to fight corruption, and foster sustained democratic governance, among others. At the end of that workshop, major action steps were mapped for implementation including the launch of a national integrity week and integrity awards, developing and enforcing codes of conduct, strengthening and enhancing existing laws, empowering CHRAJ through improved legislation and greater resource allocation.

The creation of the GACC was a direct result of the National Integrity Workshop. It provides a forum for government, public and private sector institutions and civil society organisations to work together in a broad national effort to combat corruption. The membership of GACC was expanded from the three nucleus institutions (CHRAJ, SFO and IEA) to include the Ghana Integrity Initiative (GII), the Centre for Democratic Development (CDD), Private Enterprises Foundation (PEF), and the National Institutional Renewal Program (NIRP), which later became the National Governance Programme. In 2000, the first National Plan of Action

Against Corruption was prepared by the GACC with the assistance of the World Bank.

The strengthening of the anti-corruption legal framework continued. Three key financial management laws were passed, namely the *Financial Administration Act, 2003 (Act 654)*, the *Public Procurement Act, 2003 (Act 663)* and the *Internal Audit Agency Act, 2003 (Act 658)*. The enactment of these laws in 2003 was intended to bring sanity into the nation's financial management system, prevent illicit enrichment, curb leakage of resources, and generally help to combat corruption and related misconduct. The emerging anti-corruption legal framework was further strengthened in October 2006 with the enactment of the *Whistleblowers Act, 2006 (Act 720)*. The law enables individuals to disclose, in the public interest, information that relates to the unlawful or other illegal conduct or corrupt practices of others. It also protects persons who make disclosures from victimisation or reprisals.

To demonstrate its determination to counter money laundering and terrorist financing, the country adopted a medium term National AML/CFT Strategy (Strategy), 2012-2014 to facilitate coordination, collaboration and cooperation of relevant agencies and all stakeholders involved in implementing AML/CFT measures in Ghana. The key objectives of the Strategy include: strengthening AML/CFT Legislation; strengthening AML/CFT regulatory and enforcement Institutions; capacity building and public education and mobilisation of civil society against ML/TF.

The *African Peer Review Mechanism Country Review Report of the Republic of Ghana*, released in 2005, highlighted the extent of corruption in the country and proposed sets of actions to combat it. In the same year, Ghana ratified the *United Nations (UN) Convention Against Corruption (UNCAC)* and the *Africa Union Convention on Preventing and Combating Corruption*. Ghana signed both the *ECOWAS Protocol on the Fight Against Corruption* and the *ECOWAS Supplementary Protocol on Democracy and Good Governance* in 2002.

By these actions, Ghana has created a fairly solid legal framework to fight corruption. Measures to further improve the framework are continuing. The passage of the *Freedom of Information Bill* and the *Public Officers (Code of Conduct) Bill* into law will help strengthen the nation's anti-corruption legal architecture.

To build integrity in the public service, the CHRAJ launched a publication, "*Guidelines on Conflict of Interest*" (the "*Guidelines*") which aimed at assisting public officials to identify, manage and resolve conflicts of Interest. The *Guidelines*

have been introduced to several public officers at both the national and local levels of the public service. A generic *Code of Conduct for Public Officers* (the “Code”) was also developed. The *Code* seeks to promote integrity, probity, accountability and transparency in the country.

These legislative and related developments have served to garner and heighten broad political commitment to fight corruption. The laws have also helped to identify and highlight fundamental norms and practices in Ghanaian society that are crucial to address the challenges of corruption.

Table 1 below provides a chronological list of key anti-corruption interventions:

Table 1: Key Anti-Corruption Interventions in Ghana (1957-2010)

PERIOD	KEY INTERVENTION
1957-1966	First criminal legislation on corruption was enacted: The Criminal Offences Act, 1960 (Act 29) and the Criminal and Other Offences (Procedure) Act, 1960 (Act 30).
1967-1974	A Commission of Inquiry into Bribery and Corruption under the chairmanship of Justice P.D. Anin, popularly known as the Justice Anin Commission was established. Several other Commissions were established within the period to investigate individual public officers alleged to have committed corrupt acts. The Police Service Act, 1970 (Act 350) was enacted
1979-1991	House Cleaning Exercises; Public Tribunals; Citizens’ Vetting Committees
1992-2000	The 1992 Constitution, which sought to integrate anti-corruption into national development, was adopted. The Constitution formed the basis for adoption of further measures to combat corruption. Including: The <i>Representation of the People Law, 1992 (PNDCL 284)</i> The first Action Plan - “the National Anti-Corruption Strategy and Plan was formulated. <i>CHRAJ was established under Act 456 of 1993</i> <i>Other Independent governance institutions and the Serious Fraud Office (SFO) were established.</i> A number of Laws were enacted within the period, including: Political Office Holders (Declaration and Disqualification) Act, 1998 (Act 550).

	<p>Audit Service Act 2000, Act (584) Political Parties Act, 2000 (Act 574) The National Institutional Renewal Programme (NIRP) and other public sector reforms were also initiated during the period</p>
2001-2008	<p><i>Zero Tolerance for Corruption</i> policy was launched. Some key anti-corruption laws were also enacted. They include: Financial Administration Act 2003 (Act 654) Internal Audit Agency Act, 2003 (Act 658) Public Procurement Act, 2003 (Act 663) Whistleblowers Act, 2006 (Act 720) Anti-Money Laundering Act, 2008 (Act 749) At the international level, the UNCAC and AU Convention were ratified in December 2005 as additional instruments to the Economic Community of West African States (ECOWAS) Protocol on the Fight against Corruption which had been ratified earlier. The CHRAJ also issued <i>Guidelines on Conflict of Interest</i> to assist Public Officials identify and manage Conflicts of Interest</p>
2009-2010	<p>Code of Conduct for Public Officers of Ghana was launched. Anti-Corruption manual produced by the Ministry of Justice 2009 Anti-corruption legislation enacted during the period includes: (a) The Economic and Organized Crime Office Act, 2010, (Act 804); (b) The Mutual Legal Assistance Act, 2010(Act 807); (c) The CHRAJ (Investigations Procedure) Regulations (C.I. 67) (d) AML Regulations of 2011, L.I. 1987 A Working Group to facilitate the development of a National Anti-Corruption Action Plan (NACAP) was inaugurated in 2009.</p>

2.3. Key Issues

The analysis of the state of corruption in Ghana reveals a number of serious governance challenges, namely how to:

- (a) address the gaps in the implementation of the various anti-corruption strategies adopted so far in a more holistic and sustained manner; and

(b) deal with new emerging issues to combat corruption, such as the role of gender in the fight against corruption, among others.

The latter point is crucial and warrants further analysis in that corruption negatively impacts women and children far more disproportionately than men. It is noteworthy that Ghana committed herself to gender equality and the protection of women and children's rights by the ratification of the *Convention on the Elimination of Discrimination Against Women (CEDAW)*, the *Convention on the Rights of the Child (CRC)*, as well the inclusion of legal protection in the 1992 Constitution for women and children. Following the 1995 Beijing Conference on Women and the *Beijing Platform of Action*, Ghana developed a National Gender Policy document which, among other things, seeks to mainstream gender by integrating the concepts of gender equity and gender equality into national policies and programmes. The Policy also encourages the implementation of affirmative action measures to redress gender imbalance in situations where any group, whether women or men, are perceived to be disadvantaged. The Policy also seeks to ensure that national development planning policy objectives are made explicitly gender-responsive. These values and commitments can be subverted by corruption.

Corruption is a multifaceted problem. Each form of corruption has specific characteristics and impacts on gender in specific ways. For instance, administrative corruption may take the form of sexual harassment or the extortion of sexual favours and services, where sex is exchanged for jobs, good grades in examinations or other desirables. To be effective in these circumstances, the design, implementation and monitoring of anti-corruption initiatives must take account of the unique differences, needs, concerns, priorities and experiences of women and men.

Based on the foregoing, the most significant issues that the NACAP must address include the following:

- Acceptance of Corruption or high tolerance for corruption;
- Limited awareness of the linkage between human rights and corruption;
- Weak political will to dispassionately pursue anti-corruption measures;
- Under-resourced anti-corruption agencies and independent governance institutions;
- Weak co-ordination and collaboration among anti-corruption agencies;
- Weak reporting systems and follow-up action;
- Public cynicism and apathy toward the fight against corruption;
- Weak capacity of civil society and media to address public accountability;
- Abuse of incumbency;

- Electoral fraud;
- Weak Public Financial Management (PFM) systems;
- Excessive bureaucracy;
- Politicisation of the fight against corruption;
- Limited investigative journalism;
- Weak enforcement of legislation;
- Weak assets declaration regime;
- Limited attention to gender in anti-corruption programming;
- Unregulated discretion in the use of public authority, and
- International cooperation

3.0. VISION, MISSION AND STRATEGIC OBJECTIVES

This section sets out the vision, mission and strategic objectives of the NACAP.

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

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

Strategic Objectives

The strategic objectives of the NACAP are to:

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

4.0. KEY ELEMENTS OF THE NACAP

4.1. Macro Level Issues

It is widely acknowledged that corruption is a major hindrance to economic development. Since 1957, several policies and programmes to accelerate the growth of the economy and raise the living standards of the people have achieved limited success due partly to the debilitating effects of pervasive corruption. The policies and programmes pursued under the Fourth Republic alone include *Ghana Vision 2020: The First Step (1996-2000)*; the *First Medium-Term Plan (1997- 2000)*; *Ghana Poverty Reduction Strategy (2003-2005)*; and the *Growth and Poverty Reduction Strategy (2006-2009)*. Under these strategic programmes, substantial progress was made towards the realisation of macro-economic stability and the achievement of poverty reduction goals.²⁷

Poverty continues to decline, falling from 52% in 1991/2 to 28% in 2005/6²⁸. There is a high likelihood that Ghana, in addition to achieving the first Millennium Development Goal (MDG 1), will meet the targets for universal primary education (MDG 2) and reducing the under-five mortality rate (MDG 4)²⁹. From a negative growth rate of about 3.3% during 1979-1983, the GDP growth rates experienced upward trends averaging about 4.5% between 1984 and 2000.

Ghana has a prosperous future buoyed by expectations of accelerated development from oil and gas revenues; it is witnessing significant economic growth and development, and hopes to achieve and sustain economic stability in the medium term while placing the economy on a path of higher growth in order to attain a per capita income of at least US\$3,000 by 2020. Quite obviously, Ghana is moving steadily towards becoming a middle income country.

It is important to sustain these positive gains. In order to do so, the country must continue to pursue policies that ensure transparency and accountability in government decision-making, decentralisation, and accountability. Ghana must address a number of key macro issues in the socio-economic, political and legal

²⁷It is arguable that even greater results could have been achieved but for the effects of corruption.

²⁸ GLSS 2005/6

²⁹GoG (2005): Growth and Poverty Reduction Strategy II.

environments, which are crucial to achieving success in the fight against corruption.

The discovery of oil and gas in Ghana opens up an array of opportunities to influence the pace of national development. However, the potential for oil and gas to drive the economy positively for the well-being of Ghanaians, as should be the case with other natural resources, will only be realised if this emerging industry is fully integrated into the local economy, and the menace of corruption vigorously and holistically tackled.

4.2. Public Sector Reform

In recognition of the devastating effects of corruption on national development, Ghana has pursued several initiatives to combat the canker and has achieved significant results, particularly since the return to constitutional rule in January 1993. Some of the initiatives aim at reducing opportunities for graft and rent-seeking behaviour while others seek to improve macro-fiscal discipline and management. Among such important domestic initiatives are the following:

1. Implementation of the decentralisation policy begun in 1988, including:
 - (a) Establishment of treasuries in the districts; and
 - (b) Devolution of responsibilities to the local level.
2. Efforts to reform the Constitution to improve the climate for a more effective and transparent governance regime, which may include:
 - (a) Reducing the excessive powers of the executive President;
 - (b) De-coupling the office of the Attorney-General from that of the Minister of Justice;
 - (c) Electing Metropolitan, Municipal and District Chief Executives; and
 - (d) Reviewing the mandate of CHRAJ.
3. Reform of the Civil Service
4. Monetization of the benefits of senior civil servants into the pay structure;
5. Consolidation of the various pay scales into a single “spine” salary structure;
6. Creation of a human resource database;
7. Reform of Public Financial Management Systems;
8. Control of leakage of public resources through the introduction of the Ghana Integrated Financial Management Information System (GIFMIS);
9. Enhancing the capacity of the Ghana Audit Service, Internal Audit Agency and the Public Accounts Committee of Parliament;

In addition to the initiatives outlined above, the following critical measures must be pursued in order to support the building of stronger institutions that contribute to reducing corruption:

1. Fostering an environment of meritocracy in both the public and private sectors and introducing a result-oriented culture;
2. Addressing issues of values, ethics and culture in the public service;
3. Training of public officers to enhance their productivity and to ensure they are aware of their rights, duties and obligations;
4. Improving the working conditions of public servants.
5. Ensuring equity in remuneration structure of the public service
6. Reviewing financial management practices; and
7. Improving service delivery.

4.3. Strengthening Key Anti-Corruption and Law Enforcement Agencies

The successful implementation of the NACAP demands the effective resourcing and capacity- building of the various institutions involved in combating corruption. There is an urgent and perennial need to enhance the capacity and resource-base of anti-corruption institutions such as the CHRAJ, EOCO, Audit Service, Ghana Revenue Authority, Parliament, Judicial Service, Financial Intelligence Centre, Ghana Police Service and the Attorney-General's Department. The following elements of institutional strengthening and reforms, which are common to the anti-corruption institutions, should be pursued:

- **Institutional Integrity:** The internal arrangements and procedures which define and support institutional integrity, transparency and accountability must be strengthened. Such arrangements and procedures include work ethic, codes of conduct; staff recruitment and promotion; procurement and performance management; disciplinary and grievance procedures; interests and assets disclosures; audit (performance and financial).
- **Inter-agency relations:** the identification of areas of responsibility where there is potential overlap, duplications and conflict to be addressed through joint procedures.
- **Organisational support:** Adequate relevant training for basic competences required for the conduct of inquiries, inspection and investigation, supplemented with specialist courses in law, finance, accounts, and procurement. At the same time, management, budget, human resource and operational training should be provided to the relevant staff in all agencies.

- **Infrastructure:** Improvements should be made to the working environments of the agencies, including data management and storage, premises and facilities management, etc. Consideration may be given to integrated basic functions – such as finance, clerical support and accommodation – so that economies of scale are available across agencies.
- **Access to Information:** There is an urgent need to establish an access to information regime that meets international standards. This is crucial to facilitate prompt communication and investigation of corrupt practices, as well as ensure greater transparency, probity and accountability in national governance.

4.4. Public Awareness and Education

The fight against corruption will bear little fruit without raising the awareness of public officials and the general public to the dangers of corruption and the duty of every citizen to combat corruption. The education must foster a broad societal appreciation of the causes, costs and ramifications of corruption and its linkage to the erosion of human rights. It must improve public understanding of how corruption contributes to the broadening of the scale of poverty in society. This should strengthen the citizen's resolve to resist, condemn and report corruption.

As the foremost constitutional anti-corruption body, the CHRAJ must urgently develop a comprehensive strategy for educating the general public about the negative effects of corruption. Working in concert with other relevant stakeholders, CHRAJ must use its strategic presence in the districts to appropriately educate the general public about the importance of combating corruption at the local level.

In addition, each MDA and MMDA should provide the public with information on what measures it has implemented to combat corruption, how and to whom within that entity the public may report cases of corruption.

Finally, since education is vital in building intolerance towards corruption and encouraging the active involvement of the population in the fight, CSOs and the media should be supported to extend anti-corruption messages which encourage citizens to report breaches of regulations and procedures, such as those relating to financial management and conflict of interest.

4.5. Prevention of Corruption

The main objective of any corruption prevention strategy is to reduce the opportunities for, and occurrence of, corruption and rent-seeking behaviour. This includes the elimination of legislative loopholes and gaps in operational procedures, redefining and properly regulating discretionary power as well as removing the conditions that promote or enable corruption to drive.

The Executive arm of Government has a responsibility to clearly articulate its commitment to fight corruption in all sectors of Ghanaian society. A clear statement of Government's revulsion for corruption and commitment to investigating and prosecuting persons suspected of corruption, where warranted, will impel MDA and MMDA to develop appropriate ethical environments to minimize the opportunities and incentives for corruption.

This end can be attained through the development of clear human resource procedures and regulations that address the recruitment, promotion and disciplining of staff, complaint mechanisms, procurement, codes of conduct, and ethical guidance, among others. In addition, political parties and the private sector must also be required by law to be more transparent as regards their funding sources and expenditure profiles.

The prevention of corruption can also be addressed by the private sector's refusal to engage the public sector in corrupt practices through increase awareness creation. The private sector including political parties must therefore be encouraged by legislative requirements to be more transparent in their funding and expenditure.

Finally, public organisations, MDAs and CSOs should jointly undertake citizen or household surveys to ascertain the extent to which individual public service organisations and public corporations are improving their relations with the citizens. It is also imperative that we introduce score cards and other micro-assessment techniques to monitor routine administrative corruption and service delivery performance.

4.6. Improving Investigation and Prosecution

To ensure the effective investigation and prosecution of corruption and related offences as envisaged above, the relevant institutions should:

1. Have adequate staffing and capacity building
2. Implement appropriate case management systems to ensure expedite disposal of cases
3. Adopt prosecution-led investigations;
4. Ensure anti-corruption officers, prosecutors and judges are equipped to investigate, prosecute and adopt measures to recover stolen wealth;
5. Ensure effective witness protection structures are in place.

4.7. Creating an Enabling Environment

A conducive environment is essential for the successful implementation of the NACAP. To create that enabling environment, priority must be given to the following, among others:

- (a) Political will supported by concrete actions, including resourcing anti-corruption agencies adequately;
- (b) Parliament to enact anti-corruption legislation devoid of partisan or other narrow centred considerations;
- (c) Development and enforcement of good Codes of Conduct for office holders, chief executives, legislators and professionals, among others;
- (d) Continuous demand for transparency and accountability in all sectors of national life, especially the public sector
- (e) Non-interference by political leaders in the enforcement of laws and
- (f) Facilitating reporting of corruption and protecting victims and whistleblowers.

4.8. Role of Stakeholders

Corruption cannot be successfully fought by one institution or individual. The fight against corruption is a complex undertaking that requires that all efforts and resources be galvanised. It must therefore involve stakeholders working harmoniously together. The stakeholders include:

1. Executive;
2. Public Sector institutions (MDAs and MMDAs);
3. Parliament;
4. Judiciary;
5. Anti -corruption and law enforcement agencies;
6. Independent governance institutions;
7. National Development Planning Commission;
8. Media/Civil Society Organisations;
9. Private sector;
10. Traditional authorities/religious bodies;
11. Political parties;

12. Citizenry, and
13. Development partners.

In the process of formulating NACAP, stakeholders jointly identified some key roles in the fight against corruption, which are contained in the key action commitments of the Plan (Annex 1)

4.8.1. Executive

The Executive, referring to the President and his Cabinet, has primary responsibility to ensure that the activities within the NACAP are implemented. The Executive must play a leading role in the adoption and implementation of the NACAP. It must ensure that the appropriate legal framework as well as checks and balances are established. The Executive must also ensure that anti-corruption agencies receive the necessary resources, capacity and independence to fulfil their mandates. The Executive must also adhere to and enforce Codes of Conduct and ethics that seek to regulate the actions of public officers and politically-nominated staff.

The Executive must play its key role and strengthen the independence and integrity of the judiciary by providing it with the necessary resources and facilities for the efficient performance of its functions. Government must leave judges alone to discharge their duties in accordance with law and their conscience.

The Executive must firmly enforce the law against public officers who engage in extortion, bribery and other forms of corruption. Government leaders and bureaucrats must individually and collectively provide the political will to address all forms of corruption.

4.8.2. Public Sector Organisations and Corporations

Public Sector Organisations and Corporations as identified in the Constitution must conscientiously comply with, and implement, specific actions allocated to them in the NACAP. They must also observe and implement internal self-regulatory mechanisms such as Codes of Conduct. The MDAs, in collaboration with the Public Service Commission, should work together to produce an implementing Action Plan within 12 months after the adoption of the NACAP.

4.8.3. Parliament

The legislature plays a vital role in holding the executive accountable by providing public scrutiny, holding parliamentary debates and questioning the actions of the Executive. Parliament must play this role even more effectively. Parliament should fight corruption by:

1. Being proactive in proposing anti-corruption legislation;
2. Enacting anti-corruption legislation expeditiously;
3. Exercising its oversight responsibility over the Executive; and
4. Acting as a role model in the fight against corruption.

4.8.4. Judiciary

The judiciary is the protector of the laws, the legal system and societal integrity. It is an important institution that has the responsibility to uphold good governance principles. The judiciary's prime roles are to uphold the law and ensure that those who violate the laws are punished. The Judiciary ensures the protection of fundamental human rights and freedoms often violated by corrupt individuals.

For the NACAP to succeed, the Judiciary must expeditiously try corruption offences prosecuted before them. The process of automating the courts must be continued in earnest across the country. Allegations of corruption within the Judiciary must be scrupulously investigated and appropriate action taken. There must also be strict compliance with the *Code of Conduct for Judges and Magistrates* developed in 2003 and the *Code of Conduct for Employees of the Judicial Service of Ghana*. Judicial discipline is a minimum requirement to promote anti-corruption and uphold high ethical standards. As the foremost guardians of legality in our society, judges and magistrates, as well as the staff who work with them, must evince the highest standards of integrity and honour.

4.8.5. Anti-Corruption and Law Enforcement Agencies

Anti-corruption law enforcement agencies are crucial in the fight against corruption. They must continue to execute their mandates effectively and to improve upon coordination, information sharing and collaboration. They must also enhance their contribution in the fight against corruption within their own institutions as well as beyond them. As anti-corruption and law enforcement bodies, compliance with their statutory mandates and with the Codes of Conduct

for Public Office Holders is among the most minimum expectations members of the public have of them.

Anti-corruption and law enforcement agencies have to work out effective ways to achieve synergies by co-ordinating their investigations and prosecutions, and sharing information and evidence as appropriate. They must ensure transparency and impartiality in their work, avoid party political interests, and be answerable for their actions.

4.8.6. Independent Governance Institutions

Independent governance institutions (IGIs) have been established to enhance the entrenchment of democracy and good governance into the Ghanaian society. These include the National Commission for Civic Education (NCCE), the Electoral Commission (EC), the National Media Commission (NMC) and the Auditor-General.

Indeed, the IGIs have helped to inculcate in the citizens of Ghana awareness of their civic responsibilities and an appreciation of their rights and obligations. Ghana has had successful elections and smooth transfer of power from one government to another since 1992. The freedom and independence of the media has been guaranteed. Measures to promote accountability for the use of state resources are being enhanced.

During the period of NACAP and beyond, these IGIs should aim to do more. In order to do that, it is important that the IGIs maintain their independence and similar to the Anti-Corruption Agencies and Law Enforcement Agencies, they must ensure transparency and impartiality in their work, avoid party political interests and be answerable for their actions.

4.8.7. National Development Planning Commission

The NDPC was established as a Commission responsible for development planning, policy and strategy. Its functions include formulating comprehensive national development planning strategies and ensuring that the strategies, including consequential policies and programmes, are effectively carried out. The NDPC also prepares broad national development plans and constantly reviews the plans in the light of prevailing domestic and international economic, social and political conditions. Finally, the NDPC monitors, evaluates and co-ordinates development policies, programmes and projects in the country.

It is expected that during the implementation of the NACAP, the NDPC will continue to ensure that public sector institutions plan and include in their annual programme of work the activities spelled out in the NACAP.

4.8.8. The Role of the Media

This anti-corruption action plan will not succeed without the utmost support of the Media and civil society serving as watchdogs. The media plays an important role in investigating and reporting corruption and building support to combat it. A free and independent media, with adequate access to information, is extremely important in the fight against corruption. The media must be bold in publishing information about corrupt officials and corruption cases. The media must be prepared to “name and shame” without compromise. It is by exposing incidents of corruption that there will be an environment in which corruption is a high-risk and low-gain undertaking.

However, it is important that the media operate in an impartial manner and avoid sensationalising cases. Bias and sensationalism can undermine the ability of anti-corruption agencies to deal effectively with corruption. Journalists must be properly trained in principles and techniques of investigating and reporting cases and monitoring corruption trends and practices.

Media houses should be actively involved in the fight against corruption by providing air time for sensitising the public on corruption and its impact on society and how to address it. The National Media Commission must contribute to the success of the NACAP by thoroughly investigating allegations of media corruption, sanctioning corrupt media practitioners, and upholding the highest standards of media practice.

4.8.9. Civil Society

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

Civil society plays an important role in fighting corruption and mobilising pressure for change. Civil society organisations in Ghana have played an active role in

raising public awareness about the dangers of corruption and their rights and responsibilities as citizens in confronting corruption.

It is vital that civil society creates awareness of the NACAP and generally educates the general public on anti-corruption issues. Civil society must build on their advocacy, monitoring and evaluating roles as well as providing sustained public education in support of anti-corruption.

Civil society must partner with government in this fight to ensure considerable success. More importantly, civil society must educate the citizenry and whip up public interest in the fight against corruption in an effort to deal with public apathy and cynicism toward anti-corruption issues. Finally, civil society organisations must uphold strict principles of transparency and accountability in their own operations.

4.8.10. Private Sector

The private sector is undoubtedly part of the corruption problem since it constitutes the supply side of the equation and fuels public sector corruption. Yet, the private sector is widely seen as the engine of growth and a critical partner in the anti-corruption struggle.

It is necessary that the professionalism and ethical standards in the private sector be improved. Professional and regulatory bodies in the private sector can play a dynamic role in raising the awareness of the private sector about inculcating best business practices in their work, establishing and implementing code of business practice, improving financial management procedures, and promoting good corporate governance. Leadership in these areas can be championed by such bodies as the Association of Ghana Industries (AGI), Ghana National Chamber of Commerce and Industry (GNCCI), Ghana Employers' Association (GEA) Institute of Directors of Ghana (IoD-Ghana), Institute of Chartered Accountants, Chamber of Mines, Ghana Chamber of Telecoms, Ghana Bar Association and Ghana Medical Association.

The IoD-Ghana has issued a *Best Practice Guide on Corporate Social Responsibility* ("the Guide"), which includes provisions on corruption. The Guide states, among other things, that "businesses should work against all forms of corruption, including extortion and bribery". There is also a Ghana Business Code, which is a set of principles introduced through the initiative of three key business associations in Ghana –AGI, GNCCI and GEA. The Business Code currently has 169 registered members that have ostensibly brought their operations in line with its principles. The activities of these bodies should be sustained. The AGI, GNCCI and GEA must urgently promote and extend the acceptance and use of the Business

Code in order to better contribute to the fight against corruption in the private sector.

Similarly, the cement manufacturing giant, GHACEM, has developed and implemented a *Code of Conduct for Directors and Staff*, which includes a comprehensive training scheme on “Compliance with Anti-Corruption Policies and Laws of Ghana”³⁰

The activities of these private sector entities in engendering the requisite attitudinal infrastructure for effectively fighting corruption are exemplary and must be replicated in the entire sector.

4.8.11. Traditional Authorities/Religious Bodies

Traditional authorities and religious bodies have a key role in fighting corruption in their communities. To succeed, traditional authorities must develop specifically-tailored strategies to address corruption without losing sight of their cultural and religious contexts. Traditional and religious authorities should revisit and re-examine the country’s value systems as a prelude to engaging in broad public educational and sensitisation campaigns to raise awareness about anti-corruption issues and to improve the quality of public ethics and morality in the country. The Houses of Chiefs and the Centre for Cultural Studies may wish to lead such a project. Religious bodies should also take the anti-corruption message to the pulpit. Traditional authorities and religious bodies should develop and implement a Code of Conduct for themselves and also uphold strict principles of transparency and accountability in relation to funds entrusted to them.

4.8.12. Political Parties

Political parties must raise higher the bar of integrity in order to invigorate the fight against corruption. They can do this by scrupulously and honestly complying with their statutory duty to disclose their sources of funding. In addition, political parties must enhance the scale of transparency, accountability and fair-play in their internal operations in order to better contribute to the fight against corruption. They must also improve their capacity to resist and fight vote-buying, election fraud and related malpractices as well as internal corruption. The Presidential and parliamentary candidates of political parties should also publish their sources of funding on their respective party websites, and the parties should,

³⁰ GHACEM has had training in Corporate Social Responsibility and anti-corruption laws and policies of Ghana, with the assistance of The Justice & Human Rights Institute.

as a matter of policy, require compliance with this emerging international best practice.

Beyond these measures, political parties should incorporate in their manifestoes expressions of commitment to the implementation of the NACAP. Finally, a political party that forms the government must exercise political self-restraint and avoid the phenomenon of “state capture” by which the government uses state machinery to benefit their political party instead of the wider public.

4.8.13. Development Partners

Ghana is still strongly supported by development partners (DPs). General budget support from DPs accounts for about 25-30% of yearly disbursements. Quite legitimately, DPs should be interested in assisting Ghana to ensure the successful implementation of the NACAP. They need to make every effort to strengthen the links between the NACAP and other governance reforms including support for training and mentoring of sector specialists in anti-corruption approaches.

DPs also need to deepen their engagement with Government and the independent constitutional bodies such as Parliament, the Judiciary, CHRAJ, Media Commission, Electoral Commission and the National Commission for Civic Education, as well as non-state actors. DPs should sponsor or otherwise support research to increase knowledge and understanding of corruption in Ghana and its causes, manifestations and effects, and ensure public access to their findings by, among other things, disseminating them widely.

They should also invest in fostering effective non-state monitoring and evaluation of the NACAP while at the same time supporting more effective internal monitoring by the Government, including improvement of national data management systems. Finally, DPs from the OECD should make greater efforts at improving their own country-level compliance with the *OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions*.

5.0. MONITORING AND EVALUATION

Monitoring and Evaluation (M&E) are necessary to ensure a successful implementation of NACAP. Therefore, an M&E Plan will form the basis for a systematic measurement of progress of achievement of the strategic objectives of NACAP. The M&E Plan will provide an overview of implementation and will collect and provide information that will, among others, assist implementing agencies to:

- a) make decisions about their budgets for anti-corruption activities;
- b) track progress of implementation of NACAP within their respective institutions,
- c) assess strategies, systems, and processes to identify and correct deficiencies/weaknesses in implementation of NACAP and
- d) promote collaboration among implementing agencies by sharing implementation reports.

5.1. Structure and Team

The CHRAJ, working in close collaboration with the National Development Planning Commission has the responsibility to co-ordinate and monitor the implementation of the NACAP through a Monitoring Committee (Monicom) comprising ten (10) representatives, as follows:

Table 2: Monicom Members

S/NO	INSTITUTION	NO. OF REPS.
1	Commission on Human Rights and Administrative Justice	3
2	National Development Planning Commission	2
3	Public Services Commission	1
4	State Enterprises Commission	1
5	Private Sector	1
6	Ghana Ant-Corruption Coalition	2

The Monicom, which should meet at least twice a year will among others, have the following responsibilities:

- develop an M&E Plan;
- conduct monitoring and evaluation activities;
- advise implementing agencies on implementation strategies and measures;
- hold periodic review meetings to provide opportunities for sharing of experiences;
- generate reports;
- develop data collection instruments and tools;
- provide technical support to implementing agencies where warranted, and
- generally facilitate the implementation of the NACAP.

5.2. Specific Activities

Data Collection and Tools: During implementation, CHRAJ, through the Monicom, will continuously track progress made and routinely supervise the collection of quantitative and qualitative data to verify progress towards achieving the agreed targets.

Data Quality Review: CHRAJ, through the Monicom, will review data gathered to ensure quality, accuracy, reliability, timeliness and objectivity of the data received.

Progress Reports: Annual Progress Reports will be produced to provide a systematic and structured review of implementation of the actions. Periodic reports will also be produced to address specific issues that may arise. The reports so generated will form part of reports on the state of corruption in Ghana that the CHRAJ issues annually.

Stakeholder Participation: Participatory sessions will be organised quarterly for civil society, the private sector, government and development partners to actively participate in the process to review the progress of implementation. CHRAJ should adopt a systematic dissemination approach to ensure that stakeholders, especially those in the regions and districts, fully participate in the M&E process and ensure relevant feedback is obtained and shared among stakeholders.

5.3. Follow Up and Evaluation

The M&E plans and tools will be used to generate information and data that will allow the measurement of changes that may occur as a result of the implementation of NACAP. To guarantee efficiency and effectiveness, baselines will be drawn according to the data collected and evaluations conducted.

Evaluation efforts will include commissioning and supervision of a number of evaluation efforts: term-end evaluations (i.e. at end of years 3 and 5), ad-hoc evaluations, special thematic studies and final evaluations (i.e. at end of year10) to inform the formulation of the next NACAP

6.0. PROGRAMME OF ACTION (2012- 2021)

Annex 1 contains in summary form a programme of work (Action Plan) that the various stakeholders have undertaken to implement within the next 10 years under each of the four strategic objectives identified. It outlines the activities to be undertaken, indicators, means of verification, time frame (short, medium and long-term), an indicative budget and implementing agencies (both lead and collaborating). The indicator and means of verification provide the evidence of implementation of the activities outlined for monitoring progress, as well as for purposes of evaluation. The timeframe is divided into Short-term (1-2 years), Medium-term (3-5 years) and Long-term (6-10 years).

The total cost of implementation of NACAP is estimated at **Sixty-Five Million, Two Hundred and Forty Thousand (GHC 65,240, 000)** Ghana Cedis as follows:

Table 3: Estimated Cost of Implementation

S/NO.	STRATEGIC OBJECTIVE	ESTIMATED COST (GHC)
1	To build public capacity to condemn and fight corruption and make its practice a high-risk, low-gain activity	26,950,000
2	To institutionalise efficiency, accountability and transparency in the public, private and not-for profit sectors	21,375,000
3	To engage individuals, media and civil society organisations in the report and combat of corruption	5,300,000
4	To conduct effective investigations and prosecution of corrupt conduct.	11,615,000
TOTAL		65,240,000

The budget and resource requirements provided are indicative only; it is expected that beyond this Plan, individual stakeholders will work out their detailed strategies and secure the resources necessary to execute them. A number of the activities to be undertaken in the NACAP require no serious financial outlays but self-regulation, policy, decision-making, enactment of legislation, and use of existing resources and facilities.

7.0. ANNEXES

ANNEX 1: MATRIX (PROGRAMME OF ACTION (2012 – 2021))

STRATEGIC OBJECTIVE 1: TO BUILD PUBLIC CAPACITY TO CONDEMN AND FIGHT CORRUPTION AND TO MAKE CORRUPTION A HIGH-RISK, LOW- GAIN ACTIVITY

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
1. Institute a national cultural Review Programme	National cultural Review Programme Instituted	Document Programme		√		50,000	NCCE, Min Of Information, CHRAJ	MOE, GES, Min. Chieftaincy Affairs and Culture, NDPC, Religious Bodies
2. Organise regular public education and awareness programmes on the evils of corruption and the ethos of anti-corruption in	No of public education and awareness programmes organised	A report on programmes organised			√	500,000	CHRAJ,PEF	CSOs, NCCE,GII

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
MDAs, general public, and private sector organisations .								
3. Create public fora/ community outreach/clinics at District Level	No of Community outreach/ clinics/public fora created	-report on outreach programme			√	850,000	CHRAJ, GII	NCCE, DAs, MMDAs, RCCs, PSC
4. Provide incentives ,including free legal services for public interest litigation	Incentives provided for public interest litigation	List of Incentives			√	1,000,000	Legal Aid Board	Legal Aid Board, Judiciary, LRC,CEPIL
5. Mainstream anti-corruption, ethics and integrity in public, private sectors , civil	Anti-corruption, ethics and integrity issues mainstreamed in public, private sectors, civil society & religious	Organisational programmes			√	1,000,000	CHRAJ, PSC,NDPC,GES/MOE ,PEF	Religious Bodies, Private Sector Organization, MDAs

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
society and religious organisations	organisations							
6. Introduce modules and elements to highlight and strengthen good ethical values in primary, secondary, tertiary, formal & non-formal education	Modules introduced	School curriculum		√		350,000	GES/MOE	CSOs, CHRAJ, NCCE, Non formal education Division, EOCO ,A-G, MOFEP, GNAP PS, CHASS
7. Develop co-curricular anti-corruption activities, such as integrity clubs in Junior and senior high schools	No of junior & senior high schools introduced to co curricula anti-corruption activities	School curriculum Integrity clubs		√		500,000	CHRAJ ,AuG	GES, NCCE, Heads of Junior & Senior High Schools, MOFEP, Police, AG

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
8. Provide educational corruption fighting materials for public, schools and universities, and general public.	Educational materials provided in public schools, universities and the general public	Training manuals - leaflets/pamphlets -stickers/coasters postcards etc		√		8,000,000	CHRAJ, EOCO,	GACC, GII, GES, MOE, Das, MMDAs, MDAs GACC Secretariat Universities/schools
9. Introduce anti-corruption sermons/teaching in Churches	Anti-corruption sermons/teachings introduced	Sermons and teachings		√		50,000	Faith-based organizations	Min of Culture/Chieftaincy Affairs
10. Organise awareness raising programmes on the negative impact of money laundering and financing of terrorism	Awareness raising programmes organised	-Reports -media publication of programmes			√	1,000,000	FIC, EOCO, CHRAJ	Min. Interior, Security agencies, NACOB, National Security Sect., Media

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
sustainable development and security for the general public								
11. Conduct assessment of Institutions/agencies on the integration of corruption prevention measures in their work programmes	No of Institutions/Agencies assessed on the integration of corruption prevention in their work programmes	Work programmes of Institutions/Agencies			√	500,000	NDPC	CHRAJ, CDD, GII, GACC Secretariat, MDAs, EOCO, IAA
12. Unify remuneration, including sitting allowances, for Board/Council members and companies of	remuneration and sitting allowances unified	Approval letter on allowances of Boards/Councils			√	50,000	MOFEP/Office of the President	PSC, Fair wages Commission, Ministers, Boards of affected Ministries/organisations

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
public institutions, boards and agencies.								
13. Depoliticise corruption and other related crimes	Corruption and other related crimes depoliticised	-Media reportage -Talk show discussions -speeches, utterances made			√	100,000	Political Parties, A-G, Office of the President	Media, Members of Parliament, CSOs, Office of the President
14. Enforce the Public Financial Management legislation	Public Financial Management legislation enforced	Report on implementation of Financial Management Legislation			√	4,000,000	MOFEP, Police, AG IAA	CHRAJ, EOCO, AuG, Judicial Service, Public Accounts Committee, GRA-CEPS
15. Strengthen Public complaints Units in the Judicial and Ghana Police Services	Public Complaints units strengthened	No of trained personnel- logistics & equipment provided		√		300,000		JUSAG, Judicial Service Council, Police service
16. Develop and implement anti-corruption programmes in music and	Anti-corruption programmes developed and implemented in music and drama	Programmes implementation report		√		100,000	UG of Ghana, School of Performing Arts, Centres for National Culture, Ministry of Information/Culture	CHRAJ, NCCE, MUSIGA, NAFTI

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
drama								
17. Establish an ethics development centre	Ethics development centre established	Ethics development centre			√	300,000	CHRAJ	PSC, MOFEP, MOE, Accreditation Board, EOCO, AuG, MDAs
18. Intensify public education on linkage between corruption and fundamental human rights and freedoms to general public, MDAs and CSOs	No of public educations organised	Reports of the event -Media Publication	√			400,000 x 10 yrs = 4,000,000	CHRAJ,	Network of Human Rights NGOs, other GACC members, NCCE
19. Establish special awards on integrity at all levels	Special awards on integrity established	Persons receiving awards			√	3,000,000	Office of the President	MMDAs, MDAs, Private Sector, NGOs
20. Strengthen anti-	Capacity at District, Regional	Report on anti-corruption			√	200,000	CHRAJ, EOCO, IAA	NCCE, RCC, MMDAs, AUG,

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
corruption capacity at the District, regional levels and encourage whistleblowing	levels strengthened in ant-corruption issues	capacities strengthened						IAA
21. Institute Whistle-blowing mechanism at District & Regional levels	Whistleblowing mechanism	Whistleblowing mechanism in place		√		500,000	Regional and District Coordinating Council	MDA/MMDAs, CHRAJ, EOCO
22. Undertake measures to prevent corruption in the election of Chief Executives and members of MMDAs	Corruption prevention measures undertaken	Report on measures undertaken		√		250,000	EC, CHRAJ	Security Agencies, MMDAs, RCCs, NCCE
23. Ensure transparent, equitable and	Transparent, equitable and non-partisan	Allocation Report		√		100,000	Cabinet	Parliament Office of the President, RCCS,

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
non-partisan allocation of public/state resources at all levels	allocation of public/ state resources;.							DAs, MMDAs, RCC, other relevant MDAs Min. Water Resources. Works and Housing, MPs
24. Organise programme to sensitize private sector on how to draft business contract to reflect anticorruption provisions	Programmes organised	Report on programmes	√			50,000	PEF	GBA,CHRAJ
25. Incorporate and enforce anti-corruption provisions in business contracts	Anti-corruption provisions incorporated	Report on cases reported and actions taken	√			50,000	PEF, PPA, Entity Tender Committees, and Entities	Corporate organization
26. Develop and implement	Codes of conduct developed and	Copy of codes of conduct			√	150,000	PEF, National House of Chiefs, Faith-	CHRAJ,GACC

ACTIVITIES	INDICATOR	MOV	Time Frame			IND. BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
code of code for corporate bodies, traditional authorities and not –for-profit organisations	enforced						Based Organizations and NGOs	
27. Provide incentives for private sector that enforce anti-corruption provisions	Tax cuts, award(best integrity company)	Report on incentives and awards presented			√		PEF, Corporate organizations	GRA, Min. of Fin. & Econ. Planning
28. Signing of Integrity Packs	Number of Packs	Report/Record			√		PEF	CHRAJ & GAAC

STRATEGIC OBJECTIVE 2: TO INSTITUTIONALIZE EFFICIENCY, ACCOUNTABILITY AND TRANSPARENCY IN THE PUBLIC, PRIVATE AND NOT-FOR PROFIT SECTORS

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
1. Conduct system examination of corruption-prone MDAs and Public Institutions to identify and plug loopholes	No of system examinations conducted in MDAs and Public institutions	System examination reports	√			350,000 2,035,000	CHRAJ	Other GACC Members and Secretariat, GII, EOCO, MDAs and Public Institutions
2. Monitor implementation of system examination reports and recommendations	System examination recommendations implemented	Monitoring reports		√		100,000	CHRAJ	Other GACC Members and Secretariat, GII, EOCO, MDAs, PSC and Public Institutions
3. Rotate roles and, schedules of revenue staff, and accountants.	Roles and schedules rotated	Revenue staff and Accountants movement schedule		√		50,000	C&AGD, GRA, AuG	All other revenue collection Agencies ,CSOs, Media, Public Accounts Committee
4. Introduce computerised and net-based system in all revenue	Revenue collection /generation Agencies computerised	Computers and net-work systems			√	3,000,000	GRA, MOFEP,	All other revenue collection Agencies

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
collection/generation Agencies	and net-based							
5. Simplify procedures of tax assessment, collection and payment verification	Tax assessment and payment procedures simplified	Copies of simplified version of procedures		√		150,000	GRA, MOFEP	All other revenue collection Agencies and Min of Information
6. Develop and implement user friendly, efficient and effective tax administration systems	User friendly and efficient Tax administration systems developed	Document on tax administration systems		√		2,000,000	GRA, MOFEP	
7. Enact a Budget Law	Budget Law enacted	Copies of Budget Act/Law		√		None	MOFEP, A-G, Parliament	
8. Build capacity of MDAs for transparent use of public resources	Capacities built on transparent use of public resources	Reports on capacity building programmes			√	150,000	MOFEP, AuG, CHRAJ, CEOs of state institutions	
9. Extend EITI principles to the Oil and Gas	EITI principles extended to oil and gas sector	EITI Report			√	100,000	MOFEP, GNPC, Petroleum	EITI Secretariat

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
sector.							Commission, GRA, Min of Energy	
10. Develop and implement Customer Service charters in all MDAs, public and private sector Institutions	No of MDAs and other Public and private sector Institutions that have implemented the Customer Service Charter	Copies of Service charters			√	400,000	All MDAS/Public Insts, Public Sector Reform Secretariat	Private sector, NGOs
11. Ensure that MDAs and MMDAs prepare financial statements on time for audit	Financial statements of a number of MDAs/MMDAs prepared on time for audit	Financial statement of MMDAs/MDAs			√	590,000	PSC, OHSC	All MDAs/Public Institutions
12. Establish and strengthen Audit Report Implementation Committees (ARICs) in all MDAs and MMDAs	No of ARICs established and strengthen	ARIC Reports	√			150,000	IAA, MRG&RD	All MDAs and MMDAs
13. Enforce legislation	Political party legislation	Compliance of political parties			√	1,500,000	EC and Law enforcement	All political parties, CSOs

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
regulating the operations of political parties	enforced						Agencies	
14. Enact law setting ceiling on political party financing and election expenditures	Law enacted	Copy of the Law		√		200,000	AG, Parliament and EC,NDPC	All political parties, CHRAJ
15. Establish a Parliamentary committee to follow up on PAC recommendations on the AuG's report.	Parliamentary Committee established	List of committees of parliament	√			None	Parliament	Political parties represented in Parliament, NDPC
16. Enact a Law on Code of Conduct for public officers.	Code of conduct law enacted	Copies of the Law	√			None	AG, Parliament,	CHRAJ and Auditor General
17. Develop and enforce Code of Ethics for MPs	Code of ethics developed and enforced	Copies of code of ethics	√			50,000	Parliament	CHRAJ, AG and Auditor General, APNAC

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
18. Enforce and monitor compliance with the codes of Conduct/ethics	Codes of conduct and ethics enforced and monitored	Monitoring Report			√	1,000,000	CHRAJ, Parliament	MDAs, PSC
19. Inaugurate and operationalise the National Ethics Advisory Committees of MDAs	National Ethics Advisory Committee inaugurated	Report on inauguration	√			10,000	CHRAJ	MDAs, PSC, OHCS, Office of the President
20. Assess performance and functioning of the National Ethics Advisory Committees and all other Ethics Committees of MDAs	No. of NEAC's Performance assessed	Performance Assessment Reports		√		5,000	CHRAJ	
21. Create and operationalise integrity committees/ Ethics committees within state institutions	Creation of committees	Existence of committees		√		100,000	MDAs/MMDAs	PSC, CHRAJ

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
22. Develop and Implement Public Service Integrity Programme	PSIP developed	Copies of PSI documents			√	2,500,000	CHRAJ	PSC, OHCS, Heads of MDAs
23. Review the Assets Declaration law	Assets Declaration Law reviewed	Report of review	√				A-G	AuG, CHRAJ, CSOs
24. Train Ministers, MPs and other Public Officers on Public Sector Ethics	No of MPs, Ministers and Public Officers trained	Training Report		√		150,000	CHRAJ	PSC, OOP, Parliament, OHCS, PSC
25. Enforce Conflict of Interest rules and educate public officers on conflict of interest			√			350,000	CHRAJ,	PSC, Heads of MDAs/MMDAs
26. Request public officers to disclose personal interests, e.g. affiliations, upon taking up public	No of public officers disclosing Personal interest	Circulated application letters	√				PSC, Heads of MDAs	MMDAs/MDAs

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
appointment								
27. Review SSS implementation Policy	Policies implemented and reviewed	Implementation report		√			FWC	MOFEP, C&AGD All MDAs
28. Strengthen the capacity of MMDAs for accountable and effective service delivery at the district level	Capacity building programmes implemented at MMDAs	Capacity building Reports		√		150,000	MLGRD	NALAG, CHRAJ, RCCs, CSOs MMDAs
29. Appoint CEOs of state institutions through open, competitive and transparent processes	No of appointments made through open competitive and transparent processes	Report on appointment processes	√			50,000	OOP, PSC, OHCS	Min. Employment, Boards and Councils of State Institutions
30. Create civic awareness to enable public demand accountability from public officials	No of awareness programmes organised	Reports on awareness created			√	4,000,000	NCCE	CHRAJ

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
31. Conduct public expenditure tracking surveys	No of expenditure tracking surveys conducted	Public Expenditure tracking survey Reports			√	100,000	MOFEP,	CHRAJ, MDAs, CSOs
32. Strengthen GACC and widen its membership to include human rights organizations.	No of human rights organisations included in the membership of GACC	List of members of GACC	√			100,000	GACC	CHRAJ, Network of Human Rights NGOs, CSOs
33. Train journalists in investigative journalism.	No of journalists trained in investigative journalism	Training reports			√	750,000	GJA, Media Commission	Min Info/Communication
34. Protect journalists by providing legal assistance if their reporting on corruption results in criminal charges.	No of journalists protected	Lawyers representing journalist on pro-bono basis		√		50,000	Legal Aid Scheme/Board,	Ghana Bar Association, CSOs in public Interest Litigation (CEPIL, LRC, J&HRI, etc), A-G
35. Develop and implement a National Strategic Framework for	National strategic framework developed and implemented	Framework document			√	155,000	Judicial Service	OOP, JUSAG, GBA

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
Strengthening Judicial Capacity and Integrity .								
36. Review the code of conduct for judges and Magistrates	Code of conduct reviewed	Copies of the reviewed code of conduct		√		100,000	Judicial Service	JUSAG, GBA, CHRAJ
37. Organise town hall meetings at the local level aimed at enhancing public trust in the justice system	No of town hall meetings organised	Report ons of the meetings	√			150,000	Judicial Service	GBA
38. Incorporate and enforce anti-corruption provisions in business contracts	Anti-corruption provisions incorporated		√			30,000	PPA,	Private sector, PPA, Entity Tender Committees, and Entities
39. Audit school/institution accounts annually as required by law	Schools and Institutional accounts audited	Audit Reports	√			100,000	AuG	GES/MOE IAA

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
40. Provide adequate security for the preparation, packaging and distribution of exam papers	Adequate security provided	Security report	√			150,000	WAEC, Examination Entities, Educational Institutions	MOE, GES, NVTI, Private Institutions
41. Develop Code of Conduct for lecturers of tertiary institutions and tutors of other institutions of higher learning	Codes of conduct developed and enforced	Copy of codes of conduct		√		150,000	Vice-Chancellors, Principals and Heads of Higher Institutions	CHRAJ
42. Develop and implement code of conduct for corporate bodies, traditional authorities and not-for-profit organisations	Codes of conduct developed and enforced	Copy of codes of conduct		√		150,000	PEF, National House of Chiefs, Faith-Based Organizations and NGOs	
43. Develop and implement public assets management	Public assets management systems developed and	Reports on development and implementa-			√	50,000	MOFEP, AuG	MDAs and MMDAs

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
system	implemented	tion of public assets management system						
44. Evaluate the implementation of NACAP at end of the 10 year period (i.e. 2021)	NACAP Evaluated	Evaluation Report			√	100,000	NDPC, CHRAJ	All MDAs
45. Formulate NACAP 2 based on end of period evaluation	NACAP Document formulated based on end of period evaluation	NACAP Document			√	100,000	NDPC, CHRAJ	All MDAs

STRATEGIC OBJECTIVE 3: TO ENGAGE INDIVIDUALS, MEDIA AND CIVIL SOCIETY ORGANIZATIONS IN REPORTING AND COMBATING CORRUPTION

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
1. Educate media practitioners, NGOs on anti-corruption methods, practices and challenges of fighting corruption	Media practitioners educated on anti-corruption methods, practices and challenges of fighting corruption	Educational Reports			√	175,000	GJA, Media Commission	CHRAJ, EOCO
2. Train media and NGO's on anti-corruption methods and practices.	No of media houses and NGOs trained on anti-corruption methods and practices	Training Reports			√	750,000	GJA, GII, Media Commission	Media Organisations
3. Develop, and implement a Code of Ethics/ Conduct for journalists and media establishments	Code of ethics and conduct developed and implemented	Copies of code of conduct and implementation report		√		150,000	GJA, Media Establishments	NCCE

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
4. Develop whistle blowing and other reporting mechanism (e.g complaints and suggestion boxes, hotlines).	Whistle blowing and other reporting mechanisms developed	Copies of reporting mechanisms			√	100,000	CHRAJ, Police, NACOB, BNI, G RA-CEPS	PSC, OHCS Heads of MDAs, PEF, Private sector organisations, EOCO,
5. Undertake awareness-raising programmes for the public	Awareness raising programmes organised -increase in reported cases by the public	Reports on programme		√		150,000	NCCE, CHRAJ,	GII, CDD, IDEG, ISODEC, CEPIL, LRC Civil society, AG
6. Create a confidential system for citizens to report cases of corruption and provide legal advice to victims of corruption.	Confidential system created No of persons provided with legal advice	Copy of system and list of persons provided with legal advice			√	1,000,000	CHRAJ, GII (ALAC), EOCO, A-G, Police, BNI, IAA, AuG, OOP, NACOB	Legal Aid Board, GACC
7. Enact the Right to Information	Right to information Law enacted	Copy of the law	√			25,000	A-G, Parliament of Ghana	CHRAJ, Statistical Service, NDPC

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
8. Educate and sensitise public and civil servants, media, civil society and general public on the Rights to Information Law	Education and sensitisation programmes for public and civil servants, media, civil society and general public on the Right to Information Law organised	Reports on sensitisation programmes for public and civil servants, media, civil society and general public on the Right to Information Law		√		150,000	Min. of Information, NCCE, RTI Coalition	CHRAJ, Institute of LG Studies, MLG, NGOs, CBOs, CSOs, Media
9. Set up an independent body (with a strong civil society presence) to monitor the implementation of the Right to Information Law	Independent body established	Monitoring report		√		500,000	PSC, OOP, A-G, NGOs	Parliament
10. Conduct and publish yearly studies on state of corruption in Ghana	Studies on the state of corruption conducted and published every	Report on studies undertaken and copies of studies	√	√		750,000	CHRAJ,	GII, Other members of GACC

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
	year	published						
11. Commission national surveys of public perception, awareness, attitudes, and performance of f AC agencies biannually.	National surveys commissioned bi-annually	Reports of surveys conducted			√	150,000	NDPC, Statistical service, CHRAJ,GII	EOCO, PAC, AuG, GACC
12. Clear backlog of audit works and Undertake timely auditing of state institutions	Percentage of backlog of audit works cleared -Timely audit of state institutions	Audit Reports	√			150,000	AuG, IAA	PAC
13. Increase the allocation of resources to audit agencies	Allocation of resources increased	Allocation list		√			MOFEP	Parliament, OOP
14. Establish and enforce Codes of Conduct for	Codes of conduct established and enforced	Documents containing cases relating to code of conduct;			√	100,000	NGOs	DSW

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
and within all NGOs		report on code of conduct matters addressed						
15. Formulate and implement a National Policy on NGO programmes	National NGO policy formulated and implemented	Policy document			√	150,000	NGOs	DSW
16. Strengthen institutional and operational capacity of Civil society organisations in monitoring and evaluating public revenue and expenditure and physical projects	Institutional & operational capacities of CSOs strengthened	Report on institutional and operational capacities strengthened			√	1,000,000	IDEG, ISODEC, GII, RWI/GACC	DSW, MOFEP, GRA

STRATEGIC OBJECTIVE 4: TO CONDUCT EFFECTIVE INVESTIGATIONS AND PROSECUTION OF CORRUPT CONDUCT

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
1. Ratify and domesticate international conventions relating to corruption, money laundering and transnational organised crime	Palermo convention ratified	Ratification Proceedings in the Hansard			√	25,000	AG, Min Foreign Affairs, Parliament of Ghana	FIC, EOCO, Police ,BNI
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	Corruption definition amended	Copies of amendment Act	√			50,000	AG, Parliament	CHRAJ, EOCO

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
3. Enforce AC laws impartially, regardless of position or status of parties involved.	AC laws impartially enforced				√	None	EOCO, CHRAJ, BNI, Police, NACOB	Judicial Service
4. Enact Witness Protection legislation	Protection legislation enacted and implemented	Copies of legislation and implementation report			√	None	AG and Parliament	Other anti-corruption Agencies
5. Enforce the implementation of the Financial Management Laws and regulations	Financial Management Laws and regulations enforced	Implementation Reports	√			None	PPA, ETC, Entity Heads, EOCO	CSOs, AG
6. Acquire communication and information technology equipment to support investigations	Communication and information technology equipment acquired	Equipment			√	100,000	EOCO, CHRAJ, FIC, BNI	MOFEP, Public Procurement Authority
7. Provide and furnish office accommodation for anti-corruption Agencies	Office accommodation provided and furnished	Office accommodation and facilities			√	1,000,000	MOFEP	CHRAJ, EOCO, FIC, AuG

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
8. Recruit prosecutors for A-G,s, office	No of prosecutors recruited	Staff list			√	200,000	A-G, DPP	OOP, MOFEP, PSC, OHCS
9. Build the capacity of the EOCO and FIC to undertake intelligence gathering work	Capacities built for EOCO and FIC personnel	Capacity building reports			√	1,500,000	EOCO, FIC,NACOB,BNI	AG, National Security, BNI, MMDAs, Ghana Armed Forces
10. Operationalise and widen the outreach of EOCO country-wide	No of offices opened and functioning country-wide	Offices set up			√	250,000	EOCO,	MOFEP, PSC, AG
11. Train officers of the EOCO and law enforcement agencies in basic investigation techniques, basic drug law enforcement, basic intelligence, asset tracing, Money Laundering	Officers trained in basic investigations, techniques, drug law among others	Training reports			√	1,500,000	EOCO, Police, FIC,NACOB, BNI	Police Training School, DEA
12. Strengthen AG's Department to facilitate speedy	AG's Department strengthened	Cases prosecuted speedily	√			250,000	AG	Police, General Public

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
prosecution of corruption cases								
13. Establish an independent prosecution Authority	An Independent Prosecution Authority established	Establishment document/Act		√		1,000,000	OOP, PSC, OHCS	Parliament of Ghana, A-G.
14. Recruit state prosecutors for CHRAJ and EOCO	State prosecutors recruited	Recruitment list of state prosecutors		√		250,000	A-G	CHRAJ, EOCO
15. Build capacity of anti-corruption institutions to perform their respective mandates and functions	Capacity of anti-corruption institutions built	Capacity building Reports			√	130,000	Anti-Corruption Institutions	MOFEP
16. Harmonise activities of public institutions fighting corruption	Activities of public institutions fighting corruption harmonised	Harmonisation document			√	None	Key accountability Institutions	GRA-CEPS
17. Strengthen Collaboration among anti-	Collaboration among anti-corruption	Functional Information Sharing and	√			120,000	GII,AG	EOCO, FIC, Police, Key

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
corruption agencies	agencies strengthen	exchange Platform						accountability Institutions, CHRAJ
18. Restructure CHRAJ to reflect its triple mandates: Corruption; Human Rights, and Admin. Justice	CHRAJ re-structured	Re-structured document		√		500,000	CHRAJ	PSC
19. Train Officers on Whistleblower Act.	Officers trained on the Whistleblowers Act	Training report		√		150,000	CHRAJ, AG	Anti-corruption Agencies
20. Review challenges in the implementation of Whistleblowers Act	Challenges reviewed	Revised Act		√		50,000	AG,	GACC
21. Expand computerized system of selecting judges to sit on cases	Computerised system expanded	Expanded Computerised selection list of Judges		√		150,000	Judicial Service	Judges and Legislative Association
22. Extend computerisation of court systems to all levels in all	Computerisation of court systems extended	Installed computerised systems			√	300,000	Judicial Service	NOVEP

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
regions								
23. Organise training for judicial service staff on computerized court system	Training programmes organised	Training report			√	120,000	Judicial Service	Judicial Service Staff, JUSAG
24. Strengthen the use of IT in intelligence and investigations	Use of IT strengthened			√		None	AC Agencies	A-G, Min. Communications
25. Build Capacity of AC Institutions in Asset Tracing and Recovery	Capacity of AC Institutions built	Capacity building report			√	150,000	EOCO, FIC, CHRAJ	Police, CSOs, NCCE
26. Review complaints handling procedures to reduce period of disposing of corruption complaints	Complaints handling procedures reviewed	Revised complaints document	√			None	CHRAJ, EOCO, BNI, FIC, Police, A-G, DPP	PRAAD
27. Train investigators, and prosecutors in	Number of staff trained	Training Report			√	500,000	EOCO, FIC,	Judiciary Training Institute, CSOs,

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
financial investigations, restraint, confiscation, Mutual legal Assistance								Media, Ghana Police Service, NACOB,BNI
28. Train investigators and prosecutors on witness protection legal framework	No of investigators and prosecutors trained	Training Report		√		150,000	CHRAJ,	Police, EOCO, AG, FIC, BNI,CHRAJ
29. Issue Regulations for the implementation of all anti-corruption and related legislation	Regulations on anti-corruption and related legislations issued	Copy of regulations			√	None	A-G,	FIC, EOCO, AuG, CHRAJ
30. Strengthen the national coordination capacity in combating transnational corruption and organised crime	National coordination capacity strengthened	Report on capacity strengthening			√	2,000,000	, Min of Interior, National Security, AG, Parliament	Min of Foreign Affairs, BNI,EOCO, FIC, NACOB,AG, CHRAJ
31. Undertake an in-depth review of legislation on,	Legislation reviewed	Copy of revised legislation		√		50,000	A-G	CHRAJ FIC, NACOB, EOCO, Parliament

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
mandatory sentences for drug offences and non-bailable crimes								
32. Organise study sessions on the vulnerability to money laundering and terrorism financing	Study sessions organised	Report on study sessions			√	50,000	FIC, EOCO	A-G, MOFEP,
33. Build Capacity of FIC on financial intelligence analysis	Capacity of FIC built	Capacity building report		√		150,000	FIC	Bank of Ghana, EOCO
34. Establish social movement and conduct social marketing campaigns to boost public support for the work of AC agencies	Social movement to boost support for work of AC agencies established	Social Movement Establishment Documents	√			50,000	GACC, GII	CSOs
35. Establish anti-corruption courts	Courts established	List of Courts		√		50,000	Judicial Service	AC Agencies, Parliament, A-G

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
36. Re-train and sensitise all Judges and Magistrates in the Anti-Corruption courts	Judges and Magistrates re-trained and sensitised	Training and sensitization Report			√	120,000	Judicial Service	AC Agencies, Parliament, A-G
37. Provide constitutional security of tenure of office for the IGP and heads of Ant-corruption/security agencies	Constitutional security of tenure of office provided	Constitutional provisions		√		None	A-G, Parliament of Ghana, OOP	PSC, Ghana Police Service Council, GRA-CEPS, NACOB, EOCO ,BNI
38. Conduct public Relations Programmes to enhance image of the Police Service	Public Relations Programmes conducted	Reports		√		50,000	Ghana Police Service	Min of Interior
39. Train Police officers in Public Relations and Customer Care	Police Officers trained in public relations and customer care	Training report		√		120,000	Ghana Police, GIJ	Public Relations Institute

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
40. Establish Customer Care Desks in all Police Stations	Customer Care Desks established	Customer Care Desks		√		30,000	Ghana Police Service	Public Sector Reform, PSC, CHRAJ
41. Undertake programmes on ethics, integrity and human rights for Police Officers	Programmes on ethics, integrity and human rights undertaken	Programme implementation Reports	√			50,000	CHRAJ	NCCE, Police, Network of HRs NGOs
42. Empower the public to resist police corruption and excesses	Public empowered	Public Reporting police corruption and excesses		√		50,000	Ghana Police Service CSOs, NCCE	Public, community leaders, civic clubs
43. Train Police officers on records management	No of Police Officers trained	Training report			√	300,000	Ghana Police Service	Public Records and Archival Administration
44. Complete implementation of community policing programme throughout the country	Implementation of community policing programme completed	Implementation report			√	None	Ghana Police Service	Community leaders, assembly members
45. Strengthen PIPS to investigate and prosecute corrupt	PIPS strengthened	Report		√		50,000	Ghana Police Service,	Judicial Service, A-G

ACTIVITIES	INDICATOR	MEANS OF VERIFICATION	Time Frame			INDICATIVE BUDGET (USD)	IMPLEMENTING AGENCY	
			S	M	L		Lead (L)	Collaborating Agencies
Police Officials								
46. Apply stiffer sanctions to Police personnel found culpable of misconduct	Stiffer sanctions applied	Report on sanctions			√	None	Ghana Police Service	CHRAJ, Judiciary, PSC
47. Organise professional training programmes for Police Officers	Professional trainings organised	Training Report			√	50,000	Ghana Police Service	CHRAJ, Educational Institutions