STATUS OF IMPLEMENTATION OF THE NATIONAL ANTI-CORRUPTION ACTION PLAN (NACAP)
Status of implementation of the national anti-corruption action plan (NACAP)

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Prepared by

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TABLES OF CONTENTS

EXECUTIVE SUMMARY ..................................................................................................................3

1.0 INTRODUCTION ....................................................................................................................8

1.1 Background .............................................................................................................................8

1.2 Problem Statement ..................................................................................................................11

1.3 Rationale .................................................................................................................................14

1.4 Objectives ................................................................................................................................15

1.5 Methodology ...........................................................................................................................15

1.5.1 Scope and Sampling Method ...............................................................................................16

1.5.2 Research Design and Tool ................................................................................................16

1.5.3 Sources and Methods of Data Collection ............................................................................17

1.6 Data Analysis ..........................................................................................................................17

2.0 COMBATTING CORRUPTION IN GHANA: THE PLACE OF NACAP ........................................19

2.1 Corruption in Ghana ..............................................................................................................19

2.2 The National Anti-Corruption Action Plan ...........................................................................22

2.3 Has NACAP been effective? ....................................................................................................25

2.4 Has NACAP been successful? .................................................................................................26

3.0 DESCRIPTION OF DATA AND RESULTS .............................................................................28

3.1 Level of Awareness of NACAP ...............................................................................................28

3.2 Level of Implementation of NACAP .........................................................................................29

3.2.1 Do you know about NACAP’s Annual Work Plan? Did you receive a copy of the AWP? .................................................................................................................................30

3.2.2 Have you implemented activities assigned to you under NACAP in 2015 and 2016? ..............................................................................................................................................32

3.2.3 Did you report on these activities to CHRAJ? .....................................................................33

3.3 Structural Readiness to Implement NACAP ...........................................................................34
Ghana has been fixated with fighting against corruption since independence, and, in particular, since the inception of democratic civilian rule in 1993. The newly democratized society recognized that corruption could have a negative impact on public service delivery and the fight against poverty. This recognition has led to the enactment of various anti-corruption legislation (usually emanating from the Executive branch of government) meant to “eradicate corrupt practices and the abuse of power”. Ghana has similarly created institutions meant to aid the fight against corruption. The underlying factor is that these anti-corruption measures have emanated from the Executive arm of government. Despite these measures, Ghana has not really seen any meaningful achievement in the fight against corruption as evidenced in metrics such as the Corruption Perception Index (CPI), Afrobarometer and the Ghana Integrity Initiative (GII) led Consortium's Knowledge, Perception and Experiences (KPE) of Corruption Survey. Beginning in the year 2000, and finally in 2014, Ghana adopted the National Anti-Corruption Action Plan (NACAP). NACAP was meant to mobilize the efforts and resources of stakeholders,
state and non state actors, to prevent and fight corruption through ethics, integrity and the stringent application of applicable laws. The unique selling point of NACAP is that it is the culmination of the efforts of public sector, private and civil society organizations.

**About the Study**

This study attempted to investigate the implementation of NACAP by discussing its awareness, the readiness of IPs to implement, the level of implementation and implementation challenges. Data was collected from sampled institutions using a structured interview guide consistent with the objectives of the study.

**Key Findings**

The study made the following key findings as outlined below;

There was no deliberate attempt to sensitize staff of the Implementing Partners (IPs) about NACAP, contributing to the low levels of knowledge of NACAP within society. Within the IPs, knowledge of NACAP was restricted only to the top management and the few focal persons who attended the initial trainings on NACAP. Moreover, there
I. existed was parallel knowledge of NACAP and the roles of the IPs.

II. The study noticed a lack of depth in the implementation of mandated activities. It showed that, even though IPs claimed to have implemented some activities and reported on same, checks revealed limited implementation of NACAP.

III. Most IPs had staff (mostly one person) mandated to oversee the implementation of NACAP, in addition to their core duties. The person, very often, was the one selected to attend the initial trainings organized by CHRAJ. It was, however, found that some IPs rotate staff, consequently there are often different people working on NACAP. However, the study found that very few IPs had more than one person permanently designated to NACAP, and even fewer had units in charge of NACAP.

IV. Lastly, the study found implementation challenges, the biggest of which relates to funding NACAP. Other challenges outlined included a lack of monitoring or supervision, low political buy-in and disinterest in NACAP from top management.
Recommendations

The study made the following recommendations towards a more effective implementation of NACAP:

I. Increase sensitization or awareness creation of NACAP. This should be done within the IPs for their staff. The state should take up the wider sensitization through traditional and new media.

II. Improve the implementation of NACAP activities by getting the IPs familiar with the activities. When the activities are internalized, it is easier to implement.

III. The study recommends a discussion on funding the NACAP. This discussion should happen in the light of an understanding that NACAP is a mobilization of all efforts to resist corruption. Without this understanding, IPs will continue to view NACAP as a Government of Ghana project and demand to be funded to implement the activities.

IV. IPs should create systems in-charge of NACAP implementation. Even though NACAP's MONICOM recommended that organizations set up focal units for NACAP, the study recommends, flexibly, that IPs create their own systems that would be in charge of NACAP implementation.
V. The study recommends government to lend NACAP the needed political commitment. Political commitment should come in the form of funding public IP's budgets contingent on NACAP implementation.
Ghana's transition to civilian rule in 1993, under the Fourth Republic, ushered the country into another period of democratic governance with the enactment of a new constitution. Ghana signaled its intention to combat corruption when Article 35 (8) of the new 1992 Constitution stated “the state shall take steps to eradicate corrupt practices and the abuse of power”. Thus from the outset, the Ghanaian state sought to combat corruption, a canker that results in poor public service delivery and poverty.

A cursory glance at Ghana's legal landscape shows that Ghana has enacted various laws and created institutions meant to combat corruption. These include anti-corruption legal instruments, such as a Public Procurement Law (Act 663), Whistleblower Act (Act 720), Anti-Money Laundering Act (Act 749), Public Financial Management Act (Act 921), and institutions, such as the Commission for Human Rights and Administrative Justice (CHRAJ) and the Economic and Organized Crime Office (EOCO).
In addition to the aforementioned institutions, Ghana envisaged a strategic, holistic plan towards fighting corruption in the country. Corruption was recognized as a menace that is ubiquitous, and therefore required the concerted effort of every section of society to comprehensively and effectively address it. Some of these efforts included the creation of CHRAJ, the Serious Fraud Office (now EOCO), Office of Accountability and the Ghana Anti-Corruption Coalition (a collaboration between public, private and civil society interests), which first created an Anti-Corruption Action Plan in the early 2000s (Ayamdoo, 2016).

In 2014, Ghana’s Parliament approved the National Anti-Corruption Action Plan (NACAP), with a mission to “contextualize and mobilize efforts and resources of stakeholder to prevent and fight corruption through the promotion of high ethics and integrity, and the vigorous enforcement of relevant laws” (NACAP, 2015). The NACAP was formulated by representatives from government, media, private sector, anti-corruption institutions, Civil Society Organizations (CSOs) and development partners. These institutions formed a working group that created a draft plan after nationwide consultations with citizens and institutions. The draft plan was validated and approved at a national forum on integrity in 2011, followed by its adoption by
NACAP has four strategic objectives as follows:

1) To build public capacity to condemn and fight corruption and to make corruption a high-risk, low-gain activity;

2) To institutionalize efficiency, accountability and transparency in the public, private and not-for-profit sectors;

3) To engage individuals, media and civil society organizations in reporting and combating corruption;

Implementation of NACAP is coordinated by CHRAJ. NACAP implementation, however, is ensured by the High Level Implementation Committee (HILIC) of NACAP that includes key state actors, CSOs and private sector representation. Among other duties, HILIC reviews annual progress on NACAP and approves the annual action plan for the subsequent year. HILIC is supported by the Monitoring Committee (MONICOM). Comprising 10 members, MONICOM's duties include developing an M&E Plan, conducting monitoring and evaluation of activities and facilitating the implementation of NACAP.
4) To conduct effective investigations and prosecution of corrupt conduct.

In brief, NACAP adopts a three-pronged approach to dealing with corruption: prevention; education; and investigation and enforcement. It targets public and private sector institutions by integrating anti-corruption measures into their activities. Various Ministries, Departments and Agencies (MDAs), Metropolitan, Municipal, District Assemblies (MMDAs), CSOs, anti-corruption institutions and the private sector are assigned roles and are, as a result, responsible for effectively implementing specific activities assigned. These agencies and actors are referred to as 'Implementing Partners' (IPs), and they are expected to implement NACAP and report on same to the requisite offices, including CHRAJ.

1.2 Problem Statement
NACAP's vision is to create a sustainable democratic society founded on good governance and imbued with high integrity. This would be done by building public capacity to condemn and fight corruption; institutionalize efficiency, accountability and transparency in all sectors; engage individuals, media and CSOs
to report and combat corruption; and to conduct effective investigations and prosecution of corrupt conduct.

NACAP's implementation started in 2015 with an agreed set of activities carved out for implemented that year. Implementation continued in 2016, with accompanying progress reports for both years. The years 2015 and 2016 were significant for anti-corruption in Ghana because these two years saw a fall in Ghana’s Corruption Perception Index (CPI) score, particularly the latter year. Ghana rose quite significantly in CPI scores from 37 out of 100 in 2007 to 48 in 2014 (Transparency International, cited in Trading Economics, 2017). With the exception of 2011, every subsequent year either maintained the score of the previous year or improved upon it. The score of 48 in 2014, however, dropped slightly to 47 in 2015, the first year of NACAP implementation, and then fell rather significantly to 43 in 2016, the second year of NACAP implementation.

Other studies have similarly presented a situation of increasing corruption prevalence in the country. A study carried out by the Ghana Anti-Corruption Coalition, Ghana Integrity Initiative and SEND Ghana in 2016 saw 64% of the sampled 17,996 Ghanaians claiming that corruption had increased in the last two
years (GACC, GII & SEND-Ghana, 2016). The 2017 Afrobarometer surveys revealed that about 55% of sampled respondents believed that corruption had increased significantly, increased somewhat or stayed the same within the previous 12 months (that is 2016).

It is quite disconcerting that the years of NACAP implementation seemingly have seen a prevalence of corruption in the country. While it may be argued that NACAP is a ten-year plan and should therefore not be subjected to scrutiny in its first two years of implementation, such scrutiny would help identify issues that may negatively affect implementation. Implementation of activities under NACAP for 2015 was reported by only 44% of the institutions with responsibility to report. In 2016, this figure rose to 51%. While there was a jump of reporting institutions between 2015 and 2016, NACAP implementation faces quite a challenge if only half of the institutions with responsibility are reporting on the Plan. These manifested challenges necessitate a review of the process of implementation in order to bring attention to the bottlenecks hampering implementation and allow for an effective take-off of the Plan to curb corruption in Ghana.
1.3 Rationale

The fight against corruption will not be effective unless all stakeholders are actively engaged and are playing their assigned roles. The signals so far suggest that the commitment of IPs to NACAP implementation is less than desirable. At the time of this study, the Plan was in its fourth year of implementation. The fact that prevalence of corruption is perceived to have rather increased during the first two years of NACAP implementation, and the reported challenges of under reporting, among other challenges, calls for a study to unearth the deeper issues that challenge NACAP implementation. There is an urgent need to re-examine at the implementation strategy and address the implementation challenges thus far.

The study is timely in providing stakeholders with an in-depth analysis of the challenges of NACAP implementation at its nascent stage. The study will provide recommendations that could stem the tide and pave the way for the Plan to effectively impact the corruption space. The study furthermore represents the first study on the subject to be undertaken by an institution outside the mandated state institution (CHRAJ) that tracks NACAP implementation.
1.4 Objectives
The main aim of the study is to investigate the implementation of NACAP by targeted public institutions, civil society organizations and private sector players. The objectives of the study are to:

1) Ascertain the level of awareness of NACAP among responsible institutions;
2) Ascertain the structural readiness of responsible institutions to implement NACAP;
3) Examine the level of implementation of NACAP among responsible institutions;
4) Explain implementation challenges peculiar to the public sector, private sector and civil society organizations; and
5) Make recommendations for a more effective and efficient implementation of NACAP.

1.5 Methodology
This section provides information on how data for the study was collected and analysed to reach the stated conclusions.
1.5.1 Scope and Sampling Method
A total of 29 institutions (IPs) were sampled for the study. Out of this number, only 18 institutions (institutionally-mandated representatives) responded to the research team. Whilst some of the institutions showed disinterest in discussing NACAP, the focal persons were unavailable in other institutions, and in their absence no other staff could speak to it. The sample was selected from the population of institutions listed in the NACAP document as assigned with the responsibility to report on their NACAP-related activities to CHRAJ. A mixture of stratified, purposive and simple random sampling was used to select the respondents. The population was stratified into civil CSOs, public institutions and private institutions. All units in the strata were selected using simple random sampling. The purposive sampling technique aided in selecting Implementing Partners in order to ensure that respondents had adequate knowledge of NACAP. These methods reduced selection bias and ensured that each strata within the population was represented within the sample.

1.5.2 Research Design and Tool
Data was collected using a structured interview guide consistent with the objectives of the study. The questions in the tool were grouped under five sections, namely:
a. Level of awareness of NACAP;
b. Level of implementation of NACAP;
c. Structural readiness to implement NACAP;
d. Challenges with NACAP reporting; and
e. Recommendations.

1.5.3 Sources and Methods of Data Collection
The study employed both primary and secondary sources in the collection of data. Primary data was collected using the interview guide that was structured to allow for the collection of quantitative data. Heads or representatives of CSOs, public institutions and private sector institutions who were responsible for implementing and reporting activities, as stated in the NACAP, were interviewed. Secondary sources used included the NACAP document and other relevant articles and scholarly material written on anti-corruption and NACAP.

1.6 Data Analysis
The Statistical Package for Social Sciences (SPSS) software was used in analysing the data. The quantitative variables were analysed using descriptive statistics. Qualitative data was analysed relying on a descriptive analysis of data. Statistical tests of significance were performed on the data at 0.05 (5%)
level of significance. The results were presented largely by means of info-graphics to make them easily comprehensible and appealing to a larger audience.
Corruption has been one of the biggest and most persistent talking points in the last decade as a result of its disturbing effects on Ghana's socio-economic development. Corruption has hit endemic levels in Ghana, having put its troublesome tentacles in every sector of the Ghanaian economy (NACAP, 2011). In the last decade, numerous corruption perception surveys have incrementally seen Ghanaians rating corruption as rising in the country. The more recent Knowledge, Perception and Experience (KPE) of Corruption survey, a research by the Ghana Integrity Initiative (GII), Ghana Anti-Corruption Coalition (GACC) and SEND-Ghana (2017) found that most public institutions are perceived to be corrupt. The study sampled 17,996 Ghanaians and discovered that 64% were of the view that corruption had increased within the last two years. Similarly, the 2017 Afrobarometer survey revealed that 55% of

2.0 COMBATTING CORRUPTION IN GHANA: THE PLACE OF NACAP

This section reviews the state and nature of corruption in Ghana and attempts made by the state to combat it. The section specifically examines NACAP as a national tool to fighting corruption in Ghana.

2.1 Corruption in Ghana
Corruption has been one of the biggest and most persistent talking points in the last decade as a result of its disturbing effects on Ghana's socio-economic development. Corruption has hit endemic levels in Ghana, having put its troublesome tentacles in every sector of the Ghanaian economy (NACAP, 2011). In the last decade, numerous corruption perception surveys have incrementally seen Ghanaians rating corruption as rising in the country. The more recent Knowledge, Perception and Experience (KPE) of Corruption survey, a research by the Ghana Integrity Initiative (GII), Ghana Anti-Corruption Coalition (GACC) and SEND-Ghana (2017) found that most public institutions are perceived to be corrupt. The study sampled 17,996 Ghanaians and discovered that 64% were of the view that corruption had increased within the last two years. Similarly, the 2017 Afrobarometer survey revealed that 55% of
its respondents maintained that corruption had increased in the year 2016. In Ghana, bribery is the easiest identified form of corruption. There is also nepotism, fraud and embezzlement.

The effects of corruption on Ghana and Ghanaians are many and varied. Apart from costing the state huge amounts of money, the citizenry feel the effects of corruption mainly in the poor state of service delivery across all sectors. Other effects of corruption include the weakening of the institutions of state, loss of lives (as a result of the poor state of service provision), and a worsening of the living condition of the citizenry (NACAP, 2011).

In Ghana, corruption is given the enabling environment to thrive without any effective commitment from stakeholders to shackle it. The most popular challenge of fighting corruption the politicization of corruption (Ayee, 2016). Politicians fail to name, shame, and punish corrupt officials because they are party faithfuls, and this emboldens corrupt persons as they are able to quickly rally party supporters whenever an allegation of corruption is levelled against them. This behavior translates to the erratic implementation of anti-corruption legislation. There is moreover the issue of selective enforcement of laws, and in
many cases this makes certain clauses very open to interpretation, making it less comprehensive and difficult to both interpret and enforce (Imurana et al., 2014). Other drivers of corruption include resource constraints of anti-corruption institutions like CHRAJ and EOCO, which need to be strengthened to effectively fight corruption. There is the culture of gift-giving and the lack of effective corruption reporting system (NACAP, 2011).

Historically, Ghana has made efforts to combat corruption. These attempts have spanned the various leadership regimes Ghana has had since independence in 1957. As documented elsehwere, Ghana's efforts at controlling corruption have included the following actions (NACAP, 2011):

- embarking on moralizing 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;
- public execution of persons for corruption;
- passage of draconian decrees that included the imposition of long custodial penalties;
- confiscation of properties found or believed to have been corruptly acquired by public office holders;
• 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).

• strengthening the nation's anti-corruption legislative framework through the passage of several anti-corruption laws;

• embarking on public sector and financial management reforms; and

• 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).

2.2 The National Anti-Corruption Action Plan

One of the major strategies initiated by the Government of Ghana to address corruption is the ten-year (2015-2024) National Anti-Corruption Action Plan (NACAP). NACAP was developed based on consultations and consensus reached among key stakeholders from the public and private sectors, anti-corruption organisations and CSOs, and adopted by Parliament. NACAP was developed under the coordination of the Commission on Human Rights and Administrative Justice (CHRAJ). NACAP was meant to contextualize 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. NACAP is perceived as a blueprint with the appropriate mechanisms for fighting corruption in Ghana (“National Anti-Corruption Action Plan: the Panacea,” 2013).

The NACAP is unique when compared to other strategies to combat corruption. In past years, anti-corruption strategies have mainly concentrated on embarking on public sector and financial management reforms, strengthening of the anti-corruption legislative framework through the passage of several anti-corruption laws or a declaration of a policy of zero tolerance for corruption, most of which had not considered the inputs of all its stakeholders (NACAP, 2011). The NACAP was drafted through consultation with stakeholders and integrates anti-corruption measures into the programmes and activities of public sector organizations (MDAs and MMDAs), and key actors in the private and civil society sectors. Also interesting is the fact that, with the NACAP, all stakeholders contribute directly to the fight against corruption by implementing their ascribed roles and responsibilities.
NACAP is aimed at guiding the behaviour or activities of stakeholders in the fight against corruption. Its approach to defeating corruption is three-fold: prevention, education, investigation and enforcement. It targets public and private sector institutions as well as civil society by integrating anti-corruption measures into their activities. Various MDAs, MMDAs, CSOs, anti-corruption institutions and the private sector are assigned roles and are, as a result, responsible for effectively implementing NACAP.

The fight against corruption hinges on the strength of the NACAP-developed activities assigned to the implementation partners – public, private and civil society organisations who implement the activities. NACAP activities are derived from the four strategic objectives it seeks to achieve. The IPs report annually on their assigned activities under each of the strategic objectives. As effective monitoring is essential to the success of every anti-corruption strategy, there is a Monitoring Committee (MONICOM) comprising ten (10) representatives of IPs that monitor and track the progress of implementation of NACAP and present annual reports accordingly (NACAP, 2011). In addition to MONICOM, and to aid CHRAJ in their monitoring and coordinating roles (as well as provide strategic policy direction
and advice to implementing partners), a High Level Implementation Committee (HiLIC) was established. The HiLIC is chaired by the President of Ghana's Chief of Staff and consists of representatives of state agencies, the private sector and CSOs (CHRAJ, 2015; Quayson, 2015).

### 2.3 Has the NACAP been effective?

According to the NACAP Annual Progress Report (2015), the plan has chalked some success in reducing corruption. CHRAJ credits the Plan with investigations into the National Service Scheme (NSS) scandal involving “ghost names” on the Service's payroll. Thirty-three (33) personnel from the NSS had been prosecuted whilst 163 have been dismissed and over GHS18 million recovered as a result. The Ghana Youth Employment and Entrepreneurial Development Agency (GYEEDA) allegations had also been investigated. However, there is very little supporting evidence for the assertion that these investigations and prosecutions were influenced by the implementation of NACAP activities.

Beyond investigations and prosecutions, NACAP is also credited with various anti-corruption education and capacity building programmes targeting ordinary citizens across the country. It is
yet to be established that these programmes were informed by NACAP rather than a fortuitous coincidence with the planned activities of the various IPs.

NACAP annual progress reports have consistently bemoaned the low participation of the implementing partners in the execution of the annual work plan. Only 44% of the selected institutions had reported results of their NACAP activities during the first year (2015) of implementation and 51% had reported in the second year (2016). The private sector and CSOs have not shown as much interest in reporting on or implementing activities when compared to the public sector, despite efforts to reach institutions with the reporting template and numerous reminders to do so.

2.4 Has the NACAP been successful?

The success of NACAP is represented – in the 2016 Progress Reports – by its commitment to creating awareness on the effects of corruption country-wide. There was an increase in the awareness attributed to the intensification in sensitization by NACAP’s Implementing Partners. About ten thousand, two hundred and fifty-nine (10,259) people were reached through
The 2016 Annual Progress Report also reported noticeable success with respect to institutional participation in the implementation and reporting on the NACAP. In 2016, the number of implementing partners increased to 86 from 57 in 2015.

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

Despite these successes, there is need for more education on the importance of the implementation of the activities enshrined in NACAP and its overall long-term goal. In as much as there is need for the state to show more political commitment to invest into the NACAP, it makes sense for civil society gather resources with the aim of a corruption free society. A conscious effort is needed to increase the interest of the stakeholders (especially the private sector) in implementing activities as assigned to them in the Annual Work Plan of NACAP.
As stated earlier, the results from the data collection will be presented based on the five main objectives the study sought to achieve.

### 3.1 Level of Awareness of NACAP

![Staff Awareness of NACAP](image)

**Figure 1: Knowledge of NACAP among staff**  
*Source: Field Survey, 2018*

Figure 1 shows data on the level of knowledge of NACAP within organizations. The figure shows that most (78%) of the staff in the respondent-organizations are not aware of NACAP, whilst only 22% are aware.
3.2 Level of Implementation of NACAP

The study sought to find out the level of implementation of the NACAP by asking three major questions:

I. Do you know about NACAP's Annual Work Plan? Did you receive a copy of the AWP?

II. Have you implemented activities assigned to you under NACAP in 2015 and 2016?

III. Did you report on these activities to CHRAJ?

The analysis of the results is showed below.
3.2.1 Do you know about the NACAP Annual Work Plan? Did you receive a copy of the AWP?

**Figure 2: Knowledge of AWP**

**Figure 3: Receipt of AWP**
Figure 2 shows that 83% of respondents had knowledge of NACAP's Annual Work Plan (AWP), as against 17% who claimed to have no knowledge of the AWP.

Figure 3 shows that 58.8% of the organizations who had stated that they had knowledge of the AWP, received the AWP in 2015. Moreover, in 2016, 70.6% of respondents received the AWP. It showed about a 12% increase in receipts of the AWP.

Figure 4: Period of receipt of AWP

Figure 4 showed the periods within which the organizations received the AWP in 2015 and 2016. From the data, we see that most of the respondent organizations received the AWPs in the first quarter of the year.
3.2.2 Have you implemented activities assigned to you under the NACAP in 2015 and 2016?

Figure 5 above showed that 56% and 72% of respondent-organizations implemented NACAP in 2015 and 2016 respectively. Respondent-organizations that did not respond dropped from 44% (8 out of 18) in 2015 to 28% (5 out of 18) in 2016.

Figure 5: Implementation of NACAP Activities
3.2.3 Did you report on these activities to CHRAJ?

If you implemented NACAP Activities and reported to CHRAJ

Figure 6: Implementing and reporting to CHRAJ

Figure 6 provides information on respondent-organizations who implemented NACAP and reported to CHRAJ. Ninety percent (90%) and 85% respondent-organizations in 2015 and 2016 respectively implemented their NACAP activities and reported on same to CHRAJ.
3.3 Structural Readiness to Implement NACAP

The study sought to determine organizations' structural readiness to implement NACAP by asking questions concerning staff designated to NACAP, the extent of integration of NACAP into organizations' own workplans, and levels to which organizations understand NACAP Reporting tools. In all, it could be seen from the data collected that the sampled institutions were structurally ready to implement the NACAP.

3.3.1 Staff designated to NACAP

![Staff designated to oversee NACAP implementation](image.png)

Figure 7: Staff designated to NACAP Implementation

The study asked if organizations had staff designated to oversee the implementation and reporting on NACAP. About 67% respondent-organisations had staff designated to oversee the implementation of NACAP.

Page | 34
3.3.2 Preparing Respondent-Organization’s Workplan

When do you prepare your annual workplan

- 16.7% prepare in July-Sept (of previous year)
- 38.9% prepare in Oct-Dec (of previous year)
- 44.4% prepare in Jan-March (of year in question)

*Figure 8: Preparing respondent-organization’s annual workplan*

The data showed that about 83% of respondent-organizations prepared their workplans (the organization's plan for their work) within the last quarter of the preceding year (October – December) and the first quarter (January – March) of the actual year.
3.3.3 Integrating NACAP into Organizations’ Workplans

Were you able to integrate NACAP into your workplans?

![Bar chart showing integration rates for 2015 and 2016.]

Figure 9: Integrate assigned activities

The data showed that in 2015 and 2016, 50% and 56% respondent-organizations, respectively, were able to integrate NACAP activities into their organization's internal workplans for the year. About 50% and 44% organizations respectively were unable to integrate NACAP activities into their internal workplans.
3.3.4 Knowledge on reporting tools

How conversant are you with the NACAP Reporting Template

![Bar chart showing percentages of respondents conversant with reporting tool]

- Very conversant: 66.7% in 2015, 73.3% in 2016
- Fairly conversant: 16.7% in 2015, 13.3% in 2016
- Don't know: 16.7% in 2015, 13.3% in 2016

*Figure 10: How conversant are you with the reporting template*

About 67% and 73% of respondent-organizations were very conversant with the reporting tool in 2015 and 2016 respectively.
3.3.5 Clear and easy submission protocol

About 74% of respondent-organizations admitted that the submission protocol for NACAP reports was clear and easy.

Figure 11: Clear and easy submission protocol

About 74% of respondent-organizations admitted that the submission protocol for NACAP reports was clear and easy.
3.4 Challenges with Implementing NACAP

The study sought to investigate challenges with the implementation of NACAP. It asked two questions; whether respondent-organizations are able to implement, and if they had any challenges implementing NACAP.

3.4.1 Are you able to implement NACAP Activities

Are you able to implement NACAP Activities

![Pie chart showing 72% Yes and 28% No]  

Figure 12: Ability to implement NACAP

Most (about 72%) respondent-organizations agreed that they are able to implement. There was about 28% of respondent-organizations not able to implement NACAP.
3.4.2 Challenges implementing NACP

Do you have challenges implementing NACP

- Yes 81%
- No 19%

Figure 13: Challenges implementing NACP

Ability to source funding to implement NACP

- Yes 33%
- No 67%

Figure 14: Funding implementation of NACP
As shown in figure 13, about 81% of respondent-organizations admitted they had challenges implementing the NACAP. Figure 14 shows that only 33% of respondent-organisations are able to source funds from external sources (outside their own funds) to implement NACAP.
4.0 DISCUSSION OF RESULTS AND FINDINGS

This chapter presents an analysis from the primary data results and the findings from the study as captured in the preceding chapter. The chapter also draws from secondary data sources in the discussion of the findings to analyze what the results mean for NACAP implementation in Ghana. The discussion is organized around on the five areas covered in the previous section.

4.1 Level of Awareness of NACAP

The study made the finding that there was no concerted effort by the IPs to sensitize staff about NACAP. This contributed to the low levels of awareness of NACAP. Responses from the institutionally-mandated respondents revealed that staff who had some awareness of NACAP had come by that knowledge through other means (such as radio, newspapers, internet) rather than sensitization programmes within the organization. An interviewee remarked;

“The challenge is with the education. As an institution, we have not deliberately had conversations about it except for projects. The staff would know about it as part of projects”
Moreover, in most IPs, knowledge of NACAP was restricted to top management and the few focal persons selected to attend initial NACAP trainings. The information has not trickled down and so staff are often unaware of NACAP. This was evident in situations where some sampled respondent-organizations could not avail themselves to the interview because the person who knew about the NACAP was not available.

It became evident that there was parallel understanding on what NACAP is, and the roles of the implementing partners. Mainly, respondent-organizations conceived NACAP to be a programme belonging to CHRAJ, instead of the national effort it is supposed to be. A respondent conceived of NACAP as “... a measure to make sure we introduce ethics in our organizations or in the functions of our organizations”.

4.2 Level of Implementation of NACAP

When triangulating the interview responses with the NACAP Implementation Reports for 2015 and 2016, the study noticed a lack of depth in the implementation of mandated activities for those organizations who responded that they had implemented and reported in both 2015 and 2016. The table below provides information on the level or extent of implementation.
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<tr>
<th>Name of organization</th>
<th>Level of Implementation</th>
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<tbody>
<tr>
<td>Ghana Police Service</td>
<td>0%</td>
<td>The Police had about 24 activities which they were to implement as a lead or a collaborating institution. In the report, the Police were not mentioned to have implemented any of their activities.</td>
</tr>
<tr>
<td>Narcotics Control Board (NACOB)</td>
<td>12.5%</td>
<td>NACOB were responsible for implementing about 8 activities in the NACAP as lead or collaborating agency but only one was implemented. Their main activity implemented both in 2015 and 2016 as a collaborating agency was found under strategic objective one which was to organize awareness raising programmes on money laundering.</td>
</tr>
<tr>
<td>Economic and Organized Crime Office (EOCO)</td>
<td>21%</td>
<td>EOCO is responsible for 33 activities in the NACAP and implemented four (4) in 2015 and six (6) in 2016. Their activities mostly fell under the first and fourth strategic objectives. They were more related to creating awareness, investigating and prosecution.</td>
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</tbody>
</table>

1 The study however did not consider voluntary activities which were implemented by the IPs even though they were not specifically mentioned in the NACAP.
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<th>Name of organization</th>
<th>Level of Implementation</th>
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<tr>
<td>Ghana Integrity Initiative (GII)</td>
<td>N/A</td>
<td>In 2015 GACC, GII and SEND Ghana organized 50 district level sensitization programmes in all the 10 regions. This was the only activity stated to have been implemented by GII. They were however, not mentioned in the NACAP report as responsible for the implementation of any activity. In 2016, they also trained citizens on reporting corruption and investigative journalism as well as conducting surveys on perception of corruption.</td>
</tr>
<tr>
<td>National Vocational Training Institute (NVTI)</td>
<td>5%</td>
<td>NVTI did only reported in 2016 but not related to its activity as stated in the report. According to the report, the NVTI is to collaborate with other agencies to provide adequate security for the preparation, packaging and distribution of exams papers. However, they reported on sensitizing staff on NACAP and the reporting tool.</td>
</tr>
<tr>
<td>Financial Intelligence Centre (FIC)</td>
<td>20%</td>
<td>The FIC is responsible for about 7 activities in the NACAP but were mentioned to have implemented three in 2015. These activities were mostly related to training. In 2016, they implemented 5</td>
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<tr>
<td>Electoral Commission (EC)</td>
<td>N/A</td>
<td>The annual progress report for 2015 does indicate that EC reported but there was no mention of activities they implemented. In 2016, they did not report at all</td>
</tr>
<tr>
<td>National Development Planning Commission (NDPC)</td>
<td>10%</td>
<td>The NDPC were not mentioned to have implemented any activity in 2015 even though they reported. In 2016, only one activity was implemented; put in place a toll-free line for subscribers and staff to report abuses of the process to the head office. NDPC have about eight (8) activities in the NACAP to implement.</td>
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<tr>
<td>Judicial Service</td>
<td>20%</td>
<td>In 2015 the Judicial service implemented two (2) activities out of 13. These activities were mainly training and a computerized system of assigning cases to judges. In 2016, they implemented three (3) activities which were same as above except for establishing a complaints unit at the new</td>
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<td>Name of organization</td>
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<td>Public Procurement Agency (PPA)</td>
<td>N/A</td>
<td>PPA has only one activity which is to incorporate and enforce anti-corruption clauses in business contracts which is an activity already implemented by PPA. However, in 2015, PPA reported to have organized training sessions on public procurement for public officers. Even though it was stated in the progress report that PPA reported in 2016, there was no mention of any activity implemented.</td>
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<tr>
<td>Ghana Anti-Corruption Coalition (GACC)</td>
<td>10%</td>
<td>In 2015, GACC’s report on NACAP activities were mainly sensitizing and sharing resources on corruption. In 2016, activities were also more concentrated on sensitization and training of citizens on corruption.</td>
</tr>
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### 4.3 Structural Readiness to Implement NACAP

The study found that most IPs had a staff member designated to oversee the implementation of NACAP, in addition to their core work within the IP. Thus, the person's work on NACAP is temporary.
Some of these persons were the staff initially mandated by their organizations to attend the inaugural NACAP training organized by CHRAJ. Some others rotate staff and often there are different persons handling the implementation of NACAP. Very few IPs had more than one person designated to NACAP, and even fewer had units in charge of NACAP implementation. The lack of a permanent person or unit means no staff is permanently responsible for NACAP implementation, thus hampering effective implementation. It also means that NACAP becomes a stand-alone item of sorts, rather than anti-corruption measures that are woven into the fabric of the implementing agency.

**4.4 Challenges with Implementing NACAP**

The study found that most IPs were able to implement their activities even though they had challenges doing so. They were mainly unable to fund the implementation of NACAP. The public organizations often receive less than the amounts they budgeted for from the state. This culminates in a slashing of their budget and, often, NACAP activities are the first to be removed. The private and CSO sectors do not receive any funds from the government for the implementation of NACAP, and so are left to implement on their own with the few resources they may have.
The underlying issue with the funding is the conception of NACAP as a CHRAJ or Government of Ghana-owned project, and IPs expect the state to provide the funds for its implementation. Other challenges outlined in the study include low sensitization, the lack of monitoring or supervision, low political buy-in and disinterest in NACAP from top management in organizations. Respondents were of the view that government has not shown the needed attention and support for NACAP. Leadership from the government in making sure that Ministries, Departments and Agencies are implementing the NACAP is perceived to be lacking. In years past, the former President made NACAP activities mandatory in every MDAs budget and it was part of the performance indicators each Minister had to satisfy. Currently, respondents are unable to tell the direction the government is taking concerning NACAP.

In line with the thinking that NACAP is a CHRAJ-owned programme, many respondents were of the view that CHRAJ needs to do more to supervise and monitor the implementation of NACAP. The thinking is that, without supervision and monitoring, a lot of IPs will not attach seriousness to NACAP. Again, doubts will be raised about data collected by NACAP because there is no means of independently verifying that an IP actually undertook an activity and did not exaggerate any portions of the report.
5.0 RECOMMENDATIONS

After analyzing the data received and the findings made, the study makes the following recommendations for consideration and adoption:

1. **Increase Sensitization/Awareness Creation Programs.**

   "To the extent that we have not sensitized the public adequately on the NACAP or on corruption generally, this program will continue to struggle."

The low levels of awareness of NACAP in the IPs seems to find expression in the larger society where a lot of Ghanaians may not know about NACAP at all, or may have heard of it but do not know what it entails. The recommendation to the HILIC and the MONICOM is that there is the need to kickstart extensive awareness campaigns to educate management of institutions, their staff, and the wider community on NACAP. There needs to be deliberate attempts at popularizing NACAP by the IPs, and this should be done through sensitization or awareness creation programmes organized by the IPs within their organizations. Apart from traditional media channels, consideration should be given to new media channels so as to reach the mass of the people.
2. Improve Implementation of NACAP Activities
The study recommends that IPs improve upon the implementation of NACAP. NACAP activities can best be implemented if they are woven into the IP's core functions, rather than implemented as “stand alone” activities. Implementation would also be enhanced if IPs understand NACAP and are familiar with their mandated activities.

3. Discuss the funding of the NACAP with all stakeholders involved

"Don’t see yourself as you signing a role, see yourself as contributing to a general pool of efforts to fight corruption... Quite a number of us have not understood what this effort is all about.”

The answer to the funding issue lies in addressing the conceptions IPs have of NACAP. NACAP must be seen as all of our efforts put together to resist corruption. This would also mean that IPs would begin to internalize the activities and carry them out as part of their everyday work flow. This would help us move away from the “no funds” matter. However, this would only happen when IPs are sensitized on NACAP. It is the belief of this study that when this understanding is acquired, then IPs would make space for NACAP regardless of what funds are given.
4. Create Systems in-charge of NACAP Implementation

"NACAP implementation could be more effective if specific units or focal units within organizations are identified, well-briefed or trained on the parameters of anti-corruption areas as framed in NACAP”

"Train the focal persons at a workshop to be able to properly implement and report”

The recommendation is for organizations to create systems or structures to help implement NACAP, hopefully, create or identify units within the organization who would oversee NACAP implementation and reporting. The NACAP's MONICOM in 2018 recommended (though not obligatory) that organizations should set up focal units for NACAP. There should be a Unit Head and a deputy, and at least 2 other staff. This would ensure that even when there is staff turnover, there will be someone in place who could oversee the implementation of NACAP for continuity sake.
5. Political Commitment

"Government must show some overt support for NACAP"

"Government should show more commitment towards the NACAP"

"NACAP implementation should be mandatory, attached to the conditions for promotion"

"Every sector’s programme planning should have NACAP sections"

It is recommended to the government to promote NACAP and put in place plans to encourage its implementation in public offices, such as making NACAP implementation and reporting a mandatory condition for funding MDAs and MMDAs. The previous government (John Mahama's government) made NACAP activities mandatory in every MDAs budget and was part of the performance indicators each Minister had to satisfy. Respondents feel that this kind of support from the government is needed now in order to establish NACAP as part of public sector routine. It is also recommended to the MONICOM to engage with the government to seek and establish their support for the Plan.
6. Supervision and Monitoring

"Monitoring should be done by the CHRAJ and MONICOM. CHRAJ is properly placed to do this."

"CHRAJ should be adequately funded and resourced with manpower."

The recommendation to the CHRAJ, MONICOM and HILIC is for some level of supervision and monitoring to be undertaken. Government should also be seen to be monitoring the implementation of NACAP by making it one of the performance indicators to be satisfied by the various public officials. The thinking is that, without supervision and monitoring, a lot of the public sector implementing partners will not attach seriousness to NACAP. Again, doubts will be raised about data collected by NACAP because there is no means of independently verifying that an implementing partner actually undertook an activity and did not exaggerate any portions of the report.
In Ghana's transition to democracy, corruption was visualized as resulting in poor service delivery and poverty. The nascent democracy therefore enacted various legislation aimed at combatting corruption. Having achieved varying degrees of success combatting corruption with these laws, the state envisaged a strategic and holistic plan within which to situate the fight against corruption. Beginning in the 2000s with a National Anti-Corruption Action Plan (NACAP) – which was formulated by representatives from government, civil society, media and other development partners – was finally approved by Ghana's Parliament in 2014 to “contextualize and mobilize efforts and resources of stakeholder to prevent and fight corruption through the promotion of high ethics and integrity and the vigorous enforcement of relevant laws”. Two years after the implementation of NACAP, Ghana's position on the CPI has consistently dropped, whilst other studies have reported increasing prevalence of corruption in Ghana.

The study aimed at investigating the implementation of NACAP by targeted public institutions, civil society organizations and
private sector organizations by ascertaining the level of awareness of NACAP among IPs, the structural readiness to implement, the level of implementation and implementation challenges faced by IPs. A total of 29 IPs were sampled for the study whilst 18 of them were actually interviewed.

The study makes recommendation for further research on NACAP implementation. Future research should focus on the decentralized implementation of NACAP at the district level. Corruption cannot be fought only at the national level, and so NACAP should move in tandem with Ghana's decentralization efforts.
## ANNEX 1: LIST OF SAMPLED INSTITUTIONS

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