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Corruption is undoubtedly one of the developmental challenges for Ghana. There is increasing recognition of the effects of corruption and a greater call for the need to institute measures to reduce corruption in society. The National Anti-Corruption Action Plan (NACAP) was passed by Parliament in 2014 as a comprehensive action plan encompassing preventive and curative measures, as well as prescribing specific roles for the gamut of stakeholders in Ghana, including the Metropolitan, Municipal and District Assemblies (MMDAs).

While NACAP implementation began in 2015, MMDAs were only properly and comprehensively sensitized to join NACAP implementation in 2018. There was no report of an MMDA implementing NACAP in 2015. In 2016, only 4 MMDAs reported having implemented NACAP. In 2017, 11 MMDAs reported that they implemented NACAP. 11 out of the 216 MMDAs at the time is only 5% of the total number of MMDAs expected to implement NACAP and report on implementation. NACAP implementation is a national project that ought to leave no one behind. In attempting to reverse a pervasive and growing culture of corruption and impunity, only a comprehensive strategy both in approach and geographical scope can permeate the Ghanaian society and make an impact. The issue of coverage (geographical) in implementation of the NACAP is crucial. However, the aforementioned figures are a clear indication that majority of stakeholders are not consciously implementing their assigned duties under the NACAP.
The Ghana Anti-Corruption Coalition (GACC) sought to investigate the challenges of NACAP implementation at Metropolitan, Municipal and District Assemblies (MMDAs) between 2018 and 2019. The findings in respect of 2019 could serve as a precursor to the progress of implementation for 2019 that will be done officially (led by CHRAJ) by June 2020. The study is timely in providing stakeholders with the nascent challenges militating against NACAP implementation at the local level and proposing recommendations that could pave way for the NACAP to effectively impact the anti-corruption space across Ghana. The study was a qualitative one that sampled 78 districts (using the stratified random sampling technique) but took responses from 22 districts owing to the fact that the study hit a saturation point. Primary data was gathered from NACAP Focal persons and other officers with knowledge on NACAP implementation by their MMDAs. The objectives of the study are to:

- Ascertain the level of awareness of the NACAP within MMDAs
- Ascertain the structural readiness of MMDAs to implement the NACAP
- Examine the level of implementation of the NACAP at MMDAs
- Explain implementation challenges peculiar to Metropolitan, Municipal and District Assemblies
- Make recommendations for a more effective and efficient implementation of the NACAP at MMDAs
The results of the study will be discussed in line with the aforementioned specific objectives.

2.1. Level of Awareness of the NACAP within Local Government

While all the MMDAs engaged reported that they were aware of the NACAP and had assigned focal persons for its implementation, only 22% of the MMDAs confirmed that all their staff are aware of the NACAP, as shown figure 1 below:

![Figure 1: Knowledge of the NACAP among MMDA Staff](image)

This figure is also consistent with the percentage of MMDAs that reported undertaking staff sensitization on the NACAP (22%) between 2018 and 2019. Clearly, sensitization has a role to play in getting all MMDA staff informed and knowledgeable on the NACAP.
Every major programme that has to be implemented at the local level is known to all the staff of MMDAs. For the NACAP to gain recognition and for NACAP activities to be implemented, staff of MMDAs ought to be fully informed about the Plan. It appears NACAP implementation is the duty of the NACAP focal person although the role of the focal person is more related to reporting to CHRAJ.

NACAP implementation is the duty of the entire MMDA but the duty-bearers are unaware of this responsibility. For instance, it will be difficult for a Budget Officer to genuinely allocate funding for NACAP implementation if he or she is not informed about the Plan and has not fully committed to it.

This is even truer for the Chief Executives of the various MMDAs. For now, it seems NACAP is known to only the Coordinating directors and the NACAP focal persons at the MMDAs.

2.2. Structural Readiness for the Implementation of the NACAP

Structural readiness in this context implies the dedication or assignment of specific offices and/or officers for NACAP implementation within MMDAs.

The study found out that all the MMDAs that had been trained on the NACAP had dedicated focal persons for implementation of the Plan. It is worth noting that these focal persons are staff of the Assembly who hold certain positions. The figure below shows the portfolios of the NACAP focal persons in the districts that were engaged in this study:
Figure 2: Designation of NACAP Focal Persons in MMDAs

From the diagram above, it could be observed that the NACAP focal persons are people with different portfolios; eight different portfolios to be specific. While the appointment of focal persons is a commendable initiative, the issue of who gets appointed as focal person ought to be probed.

In a number of instances, the choice of focal person seems to have been decided on the personality of the officer rather than some relationship of the NACAP to the portfolio of the officer. The argument here is that there must be some rationale informing the choice of a focal person. However, some arguments were made regarding the choice of officers to lead NACAP implementation within the district.

In the case of Budget Officers, the argument was that NACAP activities had a better chance of implementation if the focal person was the same officer in charge of tying and untying the Assembly’s purse strings. The logic extends that the Budget Officer will not forget to budget for his/her ‘own activities’.
The argument for Internal Auditors is situated within their anti-corruption role; ensuring that the expenditure of the Assembly is carried out in consonance with the full gamut of financial laws and regulations. This argument however looks inwards at proceedings within the Assembly itself and does not seem to consider that NACAP activities target district wide corruption issues.

The link between corruption and human rights has been explained, thus corruption reduces the amount of resources available to undertake human development initiatives. Human Resource Officers have seen their roles expand from being the masters of the payroll to handling disciplinary issues such as sexual harassment at the work place. Human Resource Officers are now required to handle almost everything that affects the human resource at the work place. As mentioned earlier, there is a link between corruption and human rights. This is the argument made for appointment human resource officers as NACAP focal persons.

The appointment of Planning Officers was suggested as the most obvious portfolio to spearhead NACAP implementation at the district level. This is due to the Planning Officers role as the architect of assembly activities, the initiator of the annual work plan that guides what the Assembly does in any given year.

There is merit in the arguments raised for each of these positions as the best fit for NACAP focal person. However, the issue of consistency in the portfolio of the focal persons across MMDAs is even more important than which portfolio is appointed as the NACAP Focal Person.

Consistency ensures that whichever portfolio is asked to take on the NACAP focal person role, this new role becomes part of the portfolio
and officers holding that portfolio all across Ghana become tuned to the role. In a set up (MMDA) where there is a lot of transfers, NACAP implementation has a better chance if the focal person is consistent across MMDAs. This was seen for instance at a municipality in the central region where the Planning Officer, who was the focal person, had been transferred was replaced by an Assistant Director (Central Administration staff).

Consistency means that whichever portfolio is assigned the NACAP responsibility can except to carry out same responsibility no matter which district he/she is transferred to. Beyond practice (and familiarity) makes perfect, consistency in the portfolio of the NACAP focal person also means continuity. A departing planning officer, who is also the NACAP focal person, handing over to his successor would include the NACAP in his or her notes. Even if this planning officer should forget to include NACAP in the handing over notes, the successor would expect it as it is part of the duties of a planning officer. This is the essence of the consistency argument.

2.3. Level of implementation of the NACAP at MMDAs

A key objective of this study was to ascertain the level of implementation of NACAP activities in MMDAs. This study took note of the fact that most MMDAs became acquainted with the NACAP only in the last two years (2018-2019), and therefore confined this question to that timeframe (2018-19).

The survey shows low levels of implementation in the last two years, as could be observed below:
Figure 3: Level of implementation of NACAP activities

From the diagram above, only 33% of MMDAs surveyed reported implementing NACAP in the year 2018. This number however fell to 26% in the year 2019. The challenges facing NACAP implementation in the MMDAs will be delved into the next section. However, a basic issue that ought to be mentioned here is the NACAP Annual Work Plan (AWP). The AWP is a list of NACAP activities that are to be implemented in a calendar year, as determined by the MONICOM and the NACAP High Level Implementation Committee (HiLIC). These activities are selected from the NACAP for implementation annually. It is revealing that only 17% of respondents knew about the AWP;

Figure 4: Knowledge of the NACAP Annual Work Plan
The AWP is the document that informs NACAP implementation in any given year. 83% of respondents did not know about this document. The MMDAs that had undertaken NACAP implementation in 2018 and 2019 had simply pick activities from the NACAP document and not the AWP as the protocol for implementation demands.

2.4. NACAP Implementation Challenges at MMDAs

This section is very linked to the previous one as it offers more information on the level of implementation of the NACAP at MMDAs. It is quite interesting that the challenges facing NACAP implementation at the MMDAs mirrors the challenges at the national level.

![Figure 5: Challenges of NACAP Implementation at MMDAs](image)

From the figure above, 18% of MMDAs surveyed identified lack of political will as one of the issues affecting NACAP implementation. If the converse could be assumed to be true, then that would mean there
is the political will to implement the NACAP at the MMDA level. However, if this challenge is situated within the context of the other challenges identified by respondents, there is little reason to assume the reverse is true.

Political will speaks to the issue of prioritization of the NACAP. Is anti-corruption an issue that the political leadership at the MMDAs are concerned about, and willing to invest Assembly resources in? The commitment of the political leadership to NACAP at the national level has been inconsistent. Since political will and commitment to the NACAP invariably means allocation of resources, it is important to engage the leadership of the MMDAs at the highest level and get their buy-in to the NACAP.

Perhaps the most obvious challenge from figure 5 is Funding. MMDAs have two main sources of funding; the District Assembly Common Fund (DACF) and their Internally Generated Funds (IGF). The DACF is notoriously irregular, sometimes as late as three quarters (calendar year divisions). As the major funding source, this irregularity often leaves some MMDAs borrowing during the year to run the Assembly. As a result, DACF is often exhausted on paying creditors and spending on core MMDA activities. Even with the support of the IGF, Assemblies typically report being overburdened with the financial requirements of the MMDA annual work plan to take on additional activities. However, it should be noted that only 24% of MMDAs mentioned the issue of funding, although this minority were quite vociferous and made a cogent argument on the challenge of funding.

The remaining two challenges captured in figure 5 are quite related: NACAP annual activities are unknown to focal persons and focal persons being unaware of NACAP implementation protocol. The former speaks to the low level of awareness of the NACAP annual work
plan, as captured earlier when it was reported that only 17% of surveyed MMDAs knew about the NACAP annual work plan which informs the NACAP activities to be carried out. The latter speaks to the question most asked by respondents during the survey – after the NACAP training, what next?

Although only 32% of respondents identified the issue of the NACAP implementation protocol as a challenge, this was the dominant question posed to the research team on the field. It is apparent that focal persons did not get a thorough understanding of what to do after the training, and what resources are available to them to undertake NACAP activities in the various districts.
3.1. Strengthen Structural Framework for NACAP Implementation

The current situation with NACAP focal persons for each district offers some structural relations with the national coordinating unit for the NACAP. However, as mentioned in the preceding chapter, NACAP focal persons are determined by each MMDA and come from different backgrounds as far as their formal designations are concerned. This selective appointment has implications when focal persons are transferred out of the district. There is no guarantee that proper records will be kept and a detailed handing over note made available to a successor. Two districts surveyed were already grappling with this issue as the NACAP focal person had been transferred and a successor appointed. The successors however were quite lost since they had not been given any training and were not sure about the implementation protocol for the NACAP.

One way to rectify this will be to consider which designation is the best fit for NACAP focal person in the MMDA set up. This designation should be made responsible for NACAP implementation across MMDAs. The advantage here is that all officers holding this designation will be aware of NACAP implementation and would have built their capacity in this area over time. Staff transfers will no longer threaten continuity of NACAP implementation within MMDAs since the successor will be already familiar with NACAP implementation. The uniformity of the
activities in the NACAP annual work plan for all MMDAs also ensures that a succeeding focal person is already familiar with the NACAP activities to be implemented for that particular year.

As long as there could possibly be consistency of the designations that serve as NACAP focal persons, why not focus on the office instead of the person? Why not have NACAP focal offices instead of focal persons? The distinction and advantage lies in the fact that a NACAP Focal Office puts the responsibility for NACAP implementation on more than one person. This means the capacity of all staff in that department, unit or office is built for NACAP implementation, and indeed the entire resources of that particular office is available for NACAP implementation. It also means that NACAP implementation does not suffer at all when there are staff transfers since NACAP implementation will be supported by the entire unit.

The next structural issue that has to be addressed following the argument made above is the question of which of the departments is most suitable to handle NACAP implementation. This paper will not purport to dictate which department within the MMDA set-up is better able to handle NACAP implementation. However, it is recommended that CHRAJ, the coordinating institution for the NACAP, reviews the arguments for the various departments presented earlier in this report and makes a selection based on which department has inherent traits and positioning to foster NACAP implementation.

### 3.2. Dedicated Funding for the NACAP

The central challenge for NACAP implementation, according to the focal persons that were interviewed, is funding for the NACAP. In some districts, NACAP activities were integrated into the Assembly's annual work plan but were never implemented. The
reason given was that there was no funding to undertake NACAP activities. While it must be conceded that MMDAs have many official and unofficial responsibilities, and as such, there is always competition for the scarce resources at the disposal of the Assembly. This notwithstanding, spending areas are also a reflection of priority areas.

If tackling corruption is a priority for this nation, then the anti-corruption fight needs to be decentralized. There must also be a clear plan for funding. CHRAJ has made several attempts to have government institutionalize a funding source for the NACAP. This has been met, at best, with government declarations to that effect but implementation lasted for only a brief period.

There are some funding models that could be reviewed and adopted for the NACAP. The first is dedicated funding, as has been done for People with Disabilities (PwD) and for funding the Audit Committees at the MMDAs. The District Assembly Common Fund Act (DACF), 1993 stipulates that a two percent (revised to 3%) of the fund is given to Persons with Disability to among others, support their businesses. In the case of Audit Committees, their funding is supposed to be captured in the annual budget of the MMDA, as stipulated by article 226 of the Public Financial Management Regulations, 2019 (L.I 2378). Such a model will guarantee funding for the NACAP.

An alternate funding model is an arrangement that is supposedly already at play, but is evidently not being adhered to. The Budget Guidelines for MMDAs is supposed to ask budget officers to budget for NACAP activities. The officers from MMDAs however seem to be unaware of this, suggesting that this directive may no longer be explicitly captured in the budget guidelines or there is little motivation to follow the directive. Considering the limited success of this model, perhaps it should be jettisoned in favour of the dedicated funding model discussed in the preceding paragraph. It must however be
stated that it would require considerable political will from the highest echelon of executive power and the unwavering dedication, commitment and concerted push for this by the institutions on the NACAP High Level Implementation Committee (HiLIC).

3.3. Institute Proxy Enforcement Measures

One of the foremost challenges of NACAP implementation has been the motivation of institutions to implement NACAP. It would be best if institutions are intrinsically motivated to implement NACAP, given the steep challenge of corruption. However, it seems this has not been forthcoming. The coin needs to be flipped to consider extrinsic motivation to implement NACAP activities. One of the ways to do this would be to link NACAP implementation to other mandatory programmes or beneficial programmes for the Assembly. In the case of the latter, a propitious programme is the District Performance Assessment Tool (DPAT).

As part of efforts to improve the performance of District Assemblies in terms of efficiency, accountability and delivery of basic community services, the Government of Ghana since 2008 implemented a Performance Based Grant System (PBGS) known as the District Development Facility (DDF). Under the DDF mechanism, district assemblies were assessed on selected performance indicators using the Functional Organisational Assessment Tool (FOAT). The MMDAs that performed satisfactorily were financially rewarded to implement their Medium-Term Development Plans (MTDPs) and Annual Action Plans (AAPs)[Ministry of Local Government and Rural Development, 2018].

After 10 years of implementation, the Government of Ghana decided to mainstream the good practices of the DDF into the District Assemblies
Common Fund (DACF) through the responsiveness factor. A new assessment tool known as District Assemblies Performance Assessment Tool (DPAT) has been developed building on the lessons learnt from the FOAT. As mentioned earlier, a favourable DPAT assessment means additional funding for a district. MMDAs therefore take their DPAT assessments seriously.

The recommendation here is to get NACAP implementation as one of the criteria for DPAT assessment in order to motivate MMDAs to implement NACAP. The criterion for NACAP implementation however must be framed so well, and must probe for the kind of evidence that will be difficult to fabricate implementation in order to discourage MMDAs from falsification of NACAP reports and superficial implementation of the NACAP.

3.4. Orientation of MMDA Leadership on the NACAP

One of the findings of this research is that staff at MMDAs are unaware of NACAP. This includes the leadership of the MMDAs, particularly Coordinating Directors and Chief Executives. The programming at MMDAs is led by the leadership. To quite an extent, the programmatic priorities are a reflection of the priorities of the MMDA leadership. It is therefore more likely that NACAP implementation will happen if the leadership of MMDAs are aware of the NACAP and have bought into the Plan.

The strategic decision by CHRAJ to train NACAP focal persons at MMDAs has achieved some level of awareness on the NACAP at the MMDA level and established a structural link between the MMDAs and the National Implementation Support Unit (NISU) of the NACAP at the national level. It will be prudent to go beyond this to undertake an orientation for Coordinating Directors and Chief Executives of the
various MMDAs, especially the former. This is likely to arouse political support for the NACAP at the MMDA level; a support that is likely to translate into implementation. CHRAJ has done this in the past, but clearly the orientation needs to be periodical, rather than a one-off. This purpose could also be served by a detailed circular to these officers.

3.5. Develop NACAP Implementation Guidelines

It was quite clear from the research that even the NACAP focal persons trained were uncertain how NACAP implementation and reporting is to be done. A major issue discovered was that most of the focal persons had no idea where the activities for implementation are to come from. CHRAJ did well to share relevant NACAP documents with the focal persons during the training. The missing piece however is the protocol for implementation.

It is recommended that a brief implementation guideline be developed for the implementation of the NACA. The language and content should be so basic any official, including those completely oblivious to the NACAP, could comprehend the objective of the Plan and how implementation and reporting are to be done. The guideline should detail:

- the source for the activities to be implemented in any particular year,
- how to access the activities for any particular year,
- how to incorporate the activities into the institution's programme, and
- how to fund the NACAP and how to report implementation.
Current brochures on NACAP could be updated with this critical information to serve this purpose.

3.6. Shared Implementation of the NACAP

The research found that in districts where some NACAP implementation had taken place, there has been collaboration between the MMDAs, CHRAJ and NCCE. There are even examples of shared resources by these three institutions to undertake the NACAP. CHRAJ district offices are a key resource for NACAP implementation while NCCE possesses the sensitization and education architecture (as limited as that maybe) to support NACAP implementation.

It is recommended that MMDAs are encouraged to tap into the resources of CHRAJ and NCCE to implement NACAP. This strategy will streamline and harmonize anti-corruption efforts at the district level.