

NATIONAL ANTI-CORRUPTION ACTION PLAN

2022 MONITORING AND EVALUATION FRAMEWORK FOR DATA COLLECTION AND REPORTING

GUIDELINES FOR DATA COLLECTION AND REPORTING

1.0. INTRODUCTION

The National Anti-Corruption Action Plan (NACAP) was adopted in July 2014 for implementation by stakeholders, which include Public, Private and Not-For-Profit organizations and institutions.

In terms of implementation of NACAP by public sector organizations and institutions, the Office of the President (OoP) issued directives in March 2015 which, among others, provide that:

- All heads of institutions and leadership at all levels should take responsibility for their areas of oversight and ensure that measures are taken to combat corruption in their institutions, including implementation of roles specifically assigned to their institutions under NACAP;
- The Ministry of Finance should ensure that MDAs, MMDAs and all public sector institutions budget for the implementation of specific programmes assigned to them under NACAP, and

- Ministers, Chief Executives and Heads of Public sector institutions shall submit reports on the implementation of NACAP to the Monitoring and Evaluation Committee (MONICOM) at the CHRAJ, with copies to the Office of the President.

To assist in the assessment of the outputs or outcomes of the implementation of planned activities and generally assess the progress of implementation of NACAP in 2022, indicators have been developed under general role and the four strategic objectives of NACAP.

These guidelines have been issued to assist implementing agencies report on the implementation of their planned activities under NACAP on schedule, using the National Anti-Corruption Reporting Tool (Google Form), an online data collection and reporting tool.

## **2.0. ROLES UNDER NACAP**

### **2.1 General Role**

The General role is designed for implementation and reporting by **ALL** Implementing Partners (IPs), including public sector organizations, private sector and not-for-profit organizations.

### **2.2 Roles under Strategic Objectives**

These are roles specific to implementing agencies under the four Strategic Objectives which can be found on pages 54-90 of the National Anti-Corruption Action Plan (2015-2024).

All IPs are to use this framework to report on all activities under “General Roles” and assigned activities under the four strategic objectives.

### **3.0. THE 2022 MONITORING AND EVALUATION FRAMEWORK FOR DATA COLLECTION AND REPORTING**

The 2022 NACAP M&E Data Collection and Reporting Framework is presented in the form of a matrix as follows:

**NACAP Ref. No:** This refers to the reference number and activity under NACAP selected for implementation.

**Broad Activity:** This refers to activities for implementation as provided for in the 2015-2024 National Anti-Corruption Action Plan document, which can be found in pages 54-90.

**Indicator:** The indicator measures the expected results from the implementation of the broad activity.

**Data Source (Means of Verification):** The origin, root from which the data was collected on the indicator, e.g. Programme/ Meeting reports, Payments vouchers, Store records, etc.

IPs are required to complete the Indicator (provide result/status of implementation) and Data Source (Means of Verification) sections.

Where an implementing partner is unable to undertake a required assigned activity, the agency should indicate “**NOT UNDERTAKEN**”, in the “Indicator” section and **reasons must be provided for not undertaking the activity.**

#### 4.0 Clustering of Implementing Partners

Implementing Partners are clustered/grouped into the following:

CLUSTER/CATEGORY OF INSTITUTION	COMPOSITION
Office of the President (OoP)	Office of the President and its Agencies
Parliament	Parliament
Judicial Service (JS)	Judicial Service
Commission on Human Rights and Administrative Justice (CHRAJ)	CHRAJ
Anti-Corruption Agencies (ACAs)/Key Accountability Institutions (KAIs)	Office of the Attorney General and Ministry of Justice Office of the Special Prosecutor National Investigations Bureau Ghana Police Service and Other Security Agencies Narcotics Control Commission Internal Audit Agency Ghana Audit Service Economic and Organised Crime Office
Ministries and Civil Service	Office of the Head of Civil Service (OHCS), Ministries and the Civil Service

CLUSTER/CATEGORY OF INSTITUTION	COMPOSITION
Department, Agencies (DAs) and Other Public Sector Institutions (OPSIs)	Department, Agencies and Other Public Sector Institutions including the: Electoral Commission (EC) Ghana Revenue Authority (GRA) National Commission for Civic Education (NCCE) National Development Planning Commission (NDPC)
Metropolitan, Municipal and District Assemblies (MMDAs)	Office of the Head of Local Government Service (OHLS) as well as RCCs and MMDAs
Financial Sector	Bank of Ghana, Banks, Savings and Loans
Pension and Insurance Institutions	National Pensions Regulatory Authority National Insurance Commission Social Security and National Insurance Trust All other Pension and Insurance institutions
State Interests and Governance Authority (SIGA) and State-Owned Enterprises (SOEs)	State Interests and Governance Authority (SIGA) All State Owned Enterprises
Civil Society Organisations (CSOs)	All Civil Society and Non-Governmental Organisations

CLUSTER/CATEGORY OF INSTITUTION	COMPOSITION
Faith Based Organisations (FBOs)	Catholic Bishops Conference The Ghana Pentecostal and Charismatic Council, The National Charismatic and Christian Churches The Christian Council of Ghana The Council of Independent Churches Ghana Muslim Mission Ahmadiyya Muslim Mission Ghana All other religious bodies
Private Sector (PS)	Private Enterprise Federation All Private Organisations
Political Parties (PPs)	All Political Parties
Traditional Authorities	Ministry of Chieftaincy and Religious Affairs National House of Chiefs Centers for National Culture
Tertiary and Educational Institutions	Basic Schools, Second Cycle Schools and Tertiary Schools
Media	National Media Commission, Radio and Television stations

The clustering of IPs is for reporting on activities in relation to a specific cluster.

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## GENERAL ROLES (ACTIVITIES) OF IMPLEMENTING PARTNERS

Broad Activity	Indicator	Result (Status of Implementation)	Data Source (Means of Verification)
Budget for implementation of NACAP activities	Amount budgeted for implementation of NACAP activities		
	Actual expenditure for implementing NACAP activities		
Designate Schedule Officer(s) (Focal Person) for NACAP	Name(s), designation(s), email(s) and phone number(s) of Focal Person(s)		
<p>Sensitize staff on NACAP and SDG 16 (SDG Target 16.5 and 16.6)</p> <p>Note: SDG 16.5: Substantially reduce corruption and bribery in all their forms. SDG 16.6: Develop effective, accountable and transparent institutions at all levels.</p>	Number of staff sensitized on NACAP and SDG 16		
Strengthen internal control measures to reduce opportunities for corruption within public, private and not-for-profit sector organizations/institutions	Number of Internal Audit reports (indicate date of submission)		



Broad Activity	Indicator	Result (Status of Implementation)	Data Source (Means of Verification)
	Number of Audit Committee Meetings (indicate date of meetings)		
Establish safe and confidential reporting systems/mechanisms at the work place (e.g. complaint boxes, hotlines and web-based platforms)	Safe and confidential reporting systems/mechanisms at the work place established (Indicate mechanism in place)		
Act expeditiously on reports of corruption and misconduct in the work place.	Number of corruption (e.g. fraud, bribery, misappropriation, embezzlement etc.) complaints received		
	Number of complaints on workplace misconduct (e.g. persistent lateness, absenteeism, sexual harassment, etc.) received		
	Number of investigations on acts of corruption		
	Number of actions undertaken on workplace misconduct		

Broad Activity	Indicator	Result (Status of Implementation)	Data Source (Means of Verification)
	Number of prosecutions/sanctions on acts of corruption		
	Number of sanctions on workplace misconduct		
Develop and publicize sexual harassment policies at the work place	Sexual harassment policy at the work place (indicate whether the policy is in place)		
	Number of awareness programmes on Sexual harassment policy organised for staff		
	Publication of Sexual harassment policy (on websites, at vantage points of the offices, notice boards, etc.)		
Introduce measures to control absenteeism, lateness and moonlighting	Measures to check absenteeism, lateness (e.g. clock in device, attendance book etc)		
	Measures to check moonlighting		

## STRATEGIC OBJECTIVE 1

### TO BUILD PUBLIC CAPACITY TO CONDEMN AND FIGHT CORRUPTION AND TO MAKE CORRUPTION A HIGH- RISK LOW- GAIN ACTIVITY

NACAP Ref/ Broad Activity	Indicator	Results (Status of Implementation)	Data Source (Means of Verification)
2. Organize Regular Public Education and Awareness Programmes on the Evils of Corruption and the Ethos of Anti-Corruption in the General Public ( <b>Pension and Insurance Institutions</b> )	Number of public education and awareness programme on the evils of corruption and the ethos of anti-corruption		
	Number of beneficiaries		
3. Create Public Fora/Community Outreach/Clinics at District Level	Number of community outreach/clinics/public fora organised		
	Number of beneficiaries		
5. Mainstream Anti-Corruption, Ethics and Integrity in Public and Private Sector ( <b>Pension and Insurance Institutions</b> )	Measures or activities introduced to mainstream Anti-corruption, ethics and integrity issues		

NACAP Ref/ Broad Activity	Indicator	Results (Status of Implementation)	Data Source (Means of Verification)
10. Organize Awareness Raising Programmes on the Negative Impact of Money Laundering and Financing of Terrorism on Sustainable Development and Security for the General Public	Number of awareness raising programmes organised		
11. Conduct assessment of institutions/ agencies on the integration of corruption prevention measures in their work programmes	Number of institution/agencies assessed on the integration of corruption prevention in their work programmes		
14. Enforce the Public Financial Management legislation	Budget developed and implemented		
	Proper procurement and contracting practices adopted		
	Periodic accounting and financial reporting undertaken		
	Number of activities of Audit Committees and internal audit reports submitted		

NACAP Ref/ Broad Activity	Indicator	Results (Status of Implementation)	Data Source (Means of Verification)
	External audit recommendations and management letter implemented		
17. Establish an ethics development centre	Ethics development centre established (provide details)		

## STRATEGIC OBJECTIVE 2

### TO INSTITUTIONALIZE EFFICIENCY, ACCOUNTABILITY AND TRANSPARENCY IN THE PUBLIC, PRIVATE AND NOT-FOR-PROFIT SECTORS

NACAP Ref/Broad Activity	Indicator	Results (Status of Implementation)	Data Source (Means of Verification)
1. Conduct System Examination of Corruption-Prone Public and Private Institutions to Identify and Plug Loopholes <b>(Pension and Insurance)</b>	System examinations conducted in a number of financial institutions (provide details)		
2. Monitor implementation of system examination reports and recommendation	System examination recommendation implemented		
10. Develop and Implement Customer Service Charters in all Public and Private Sector Institutions <b>(Pension and Insurance)</b>	Customer Service Charters developed (indicate whether the charter is developed)		
	Actions taken towards implementation of customer service charter		
11. Ensure that pension and insurance institutions prepare financial statements on time for audit	Measures/actions taken to ensure financial statements of pension and insurance institutions are prepared on time for audit		

NACAP Ref/Broad Activity	Indicator	Results (Status of Implementation)	Data Source (Means of Verification)
18. Enforce and Monitor Compliance with the Codes of Conduct /Ethics	Measures taken to enforce and monitor compliance with the codes of conduct /ethics		
21. Create and Operationalise Integrity Committees/Ethics Committees within State Institutions ( <b>Pension and Insurance</b> )	Measure taken to create and operationalise Integrity/Ethics Committees		
25. Enforce Conflict of Interest Rules and Educate Staff on Conflict of Interest	Measures taken to enforce Conflict of interest rules		
	Number of staff educated on conflict of interest		
26. Request Staff (Key Officers in the Industry) to Disclose Personal Interests, e.g. Affiliations, Upon Taking up Appointment	Number of staff disclosing personal interest		
30. Create Civic Awareness to Enable the Public to Demand Accountability from Staff of the Institution	Number of awareness programmes organised		
	Number of beneficiaries		

### STRATEGIC OBJECTIVE 3

#### TO ENGAGE INDIVIDUALS, MEDIA AND CIVIL SOCIETY ORGANISATIONS IN REPORTING AND COMBATING CORRUPTION

Ref/Broad Activity	Indicator	Results / Status of Implementation	Data Source (Means of Verification)
4. Develop whistle blowing and other reporting mechanism (e.g. hotlines, toll free and other digital platform)	Whistleblowing and other reporting mechanisms developed (list reporting mechanisms in-place, including Whistle blowing)		
5. Undertake awareness-raising programmes for the public (whistle blowing and others)	Number of awareness raising programmes organised		
	Number of beneficiaries		



## STRATEGIC OBJECTIVE 4

### TO CONDUCT EFFECTIVE INVESTIGATIONS AND PROSECUTIONS OF CORRUPT CONDUCT- SHORT AND MEDIUM TERM ACTIVITIES

Ref/Broad Activity	Indicator	Result (Status of Implementation)	Data Source (Means of Verification)
5. Enforce the implementation of the Financial Management Act and Regulations	Financial Management laws and regulations enforced		
25. Build Capacity of <b>Pension</b> and <b>Insurance</b> Institutions in Asset Tracing and Recovery	Measures taken to build capacity of <b>pension</b> and <b>insurance</b> institutions in asset tracing and recovery built		
32. Organise study sessions on the vulnerability to money laundering and terrorism financing	Number of study sessions organised		