



**FINAL  
INDEPENDENT IN-DEPTH EVALUATION  
GHANA NATIONAL ANTI-CORRUPTION ACTION  
PLAN  
[NACAP: 2015-2024]**

**SEPTEMBER 2024**



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ACTION PLAN  
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This final independent evaluation report was prepared by an evaluation team comprising Professor Samuel Kobina Annim (Evaluation Manager and Government Statistician, Ghana), Professor Simon Mariwah (National Consultant and Health and Development Geography Expert), Dr. Millicent Abigail Aning-Agyei (National Consultant, Development Expert and Monitoring and Evaluation Specialist) and Dr. Prince George Aning-Agyei (Development Planner). International Evaluation Advisors (Dr. Marianne Camerer who is an anti-corruption expert; and Sofia Guillot who is a monitoring and evaluation expert) also contributed in reviewing the inception, the evaluation tools and final evaluation reports.

The Independent Evaluation Section (IES) of the United Nations Office on Drugs and Crime (UNODC) provided evaluation toolkits, guidelines and report templates for the final evaluation of NACAP. It also provided technical support in reviewing the inception report, tools and final reports of the NACAP evaluation.

### **Disclaimer**

This report presents the results of the Final Independent In-Depth Evaluation of the Ghana National Anti-Corruption Action Plan (NACAP: 2015-2024). It was funded by the Government of Ghana with technical support from the UNODC. However, the views expressed in this report do not necessarily represent the views and official policies of the Government of Ghana, Ghana Statistical Service (GSS), Commission for Human Rights and Administrative Justice (CHRAJ) and UNODC.

## CONTENTS

CONTENTS .....	IV
LIST OF TABLES .....	VI
LIST OF FIGURES .....	VII
ABBREVIATIONS AND ACRONYMS.....	VIII
FOREWORD .....	IX
ACKNOWLEDGEMENTS .....	X
DEFINITION OF KEY TERMS.....	XI
EXECUTIVE SUMMARY.....	XII
INTRODUCTION AND CONTEXT .....	xii
METHODOLOGY OF THE EVALUATION .....	xiii
MAIN FINDINGS PER EVALUATION CRITERIA.....	xiii
MAIN CONCLUSIONS.....	xvi
MAIN RECOMMENDATIONS .....	xvii
MAIN LESSONS LEARNED AND GOOD PRACTICES .....	xviii
I. INTRODUCTION .....	1
BACKGROUND AND CONTEXT .....	1
PURPOSE AND SCOPE .....	2
THE COMPOSITION OF THE EVALUATION TEAM .....	3
EVALUATION METHODOLOGY .....	4
LIMITATIONS OF THE EVALUATION .....	8
II. EVALUATION FINDINGS .....	10
RELEVANCE .....	10
EFFICIENCY .....	13
COHERENCE .....	16
EFFECTIVENESS .....	19
IMPACT .....	31
SUSTAINABILITY .....	36
HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION AND LEAVING NO ONE BEHIND .....	41
III. CONCLUSIONS .....	45
Relevance.....	45
Efficiency.....	45
Coherence.....	45

# THE GHANA NATIONAL ANTI-CORRUPTION ACTION PLAN [NACAP: 2015-2024]

Effectiveness .....	45
Impact .....	45
Sustainability.....	46
Human rights, gender equality, disability inclusion and leaving no one behind .....	46
IV. RECOMMENDATIONS.....	47
RECOMMENDATION 1 – SUSTAINABLE FUNDING FOR NACAP ACTIVITIES .....	47
RECOMMENDATION 2 – STRONGER POLITICAL ACTION .....	47
RECOMMENDATION 3 – INCLUSIVITY AND GRASSROOTS ENGAGEMENT .....	48
RECOMMENDATION 4 – CONTINUOUS CAPACITY BUILDING .....	48
RECOMMENDATION 5 – RESULTS-BASED DESIGN OF NACAP II .....	48
V. LESSONS LEARNED AND GOOD PRACTICES .....	50
LESSONS LEARNED AND GOOD PRACTICES .....	50
ANNEX I: TERMS OF REFERENCE.....	51
ANNEX II: EVALUATION MATRIX.....	65
ANNEX III: EVALUATION TOOLS: QUESTIONNAIRE AND INTERVIEW GUIDES .....	67
ANNEX IV: DESK REVIEW LIST .....	74

## LIST OF TABLES

Table 1: Number of Institutions that Participated in the Interviews by Region .....	6
Table 2: Limitations of the Evaluation and Mitigation Measures .....	8

## LIST OF FIGURES

Figure 1: Map of Ghana showing its 16 Administrative Regions and their Capitals.....	3
Figure 2: Theory of Change for the NACAP Evaluation Exercise.....	4
Figure 3: Distribution of Research Assistants for Data Collection across Region.....	7
Figure 4: Progress in Achievement of Strategic Objectives of NACAP.....	20
Figure 5: Awareness Creation Campaign against Corruption .....	21

## ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Full name/word	Abbreviation or Acronym	Full name/word
AWPs	Annual Work Plans	NACAP	National Anti-Corruption Action Plan
CHRAJ	Commission for Human Rights and Administrative Justice	NADMO	National Disaster Management Organisation
CPI	Corruption Perceptions Index	NCCE	National Commission for Civic Education
CSOs	Civil Society Organisations	NGOs	Non-Governmental Organisations
DAC	Development Assistance Committee	NISU	NACAP Implementation Support Unit
ECOWAS	Economic Community of West African States	OECD	Organisation for Economic Cooperation and Development
EOCO	Economic and Organised Crime Office	OSP	Office of Special Prosecutor
FDA	Food and Drugs Authority	PSIs	Public Sector Institutions
GES	Ghana Education Service	PWDs	Persons With Disability
GII	Ghana Integrity Initiative	RCC	Regional Coordinating Council
GRA	Ghana Revenue Authority	SDGs	Sustainable Development Goals
GSS	Ghana Statistical Service	ToC	Theory of Change
HiLIC	High-Level Implementation Committee	UNCAC	United Nations Convention Against Corruption
IES	Independent Evaluation Section	UNODC	United Nations Office on Drugs and Crime
IPs	Implementing Partners		
MDAs	Ministries, Departments and Agencies		
MMDAs	Metropolitan, Municipal and District Assemblies		
MONICOM	Monitoring Committee		
MTEF	Medium-Term Expenditure Framework		



## FOREWORD

Corruption remains a significant challenge that undermines social justice, sustainable economic growth and democratic principles upon which societies are built. Ghana has witnessed commitment and support from all segments of society, including government, civil society, the private sector and the general public, in its fight against corruption through collaborative efforts. The Government of Ghana implemented the National Anti-Corruption Action Plan (NACAP) from 2015 to 2024 as a comprehensive strategy to effectively address corruption. NACAP sought to promote and mainstream the values of integrity, transparency and accountability in all sectors of society and ensure effective enforcement of anti-corruption laws in Ghana through prevention, education and capacity-building, and investigation and enforcement measures.

As the implementation of NACAP ends in 2024, a final independent evaluation was necessary to assess the achievement and challenges of the Action Plan. The evaluation will inform future design and development of NACAP and similar plans in Ghana and other African countries.

This evaluation report presents the findings on the NACAP evaluation and offers recommendations for developing NACAP II and improving its implementation for greater impact and effectiveness. It focuses on the contribution to NACAP in curbing corruption in Ghana, rather than the status of corruption over time. It, thus, highlights Ghana's progress and challenges regarding the development and implementation of NACAP and anti-corruption measures in general. The report provides lessons learned and recommendations that can guide future efforts with respect to NACAP and anti-corruption measures in Ghana, Africa and beyond.

This final NACAP evaluation report is anticipated to serve as a valuable resource and guide for policymakers, practitioners and advocates dedicated to promoting transparency and accountable societies, as part of anti-corruption measures. Together we can strengthen our resolve and help to sustain the gains from the NACAP implementation. We call on all stakeholders, including the private sector, civil society and citizens, to support Ghana's fight against corruption across sectors.

**Professor Samuel Kobina Annim**

Government Statistician, Ghana

Ghana Statistical Service

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We are again deeply grateful to all the research assistants and data transcribers who assisted in this important national evaluation exercise. To all Implementing Partners (IPs), including Civil Society Organisations (CSOs), public and private organisations, political parties, media, individuals and the general public, we say thank you for participating and contributing to this evaluation exercise.

## DEFINITION OF KEY TERMS

**Anti-corruption:** Any action, plan, activity or policy intended or intending to reduce corruption and corruption-related practices.

**Corruption:** The misuse of entrusted power for private gain through bribery, embezzlement, misappropriation, trading in influence, abuse of office, abuse of power, illicit enrichment, laundering of proceeds of crime, concealment, obstruction of justice, patronage, nepotism and conflict of interest (NACAP, 2011, p. 24)<sup>1</sup>.

**Evaluation:** An assessment, as systematic and impartial as possible, of an activity, project, programme, strategy, policy, topic, theme, sector, operational area or institutional performance...Evaluation provides credible, useful evidence-based information that enables the timely incorporation of its findings, recommendations and lessons into the decision-making processes of the organisations and stakeholders (United Nations Evaluations Group).

**Implementing institutions:** These are institutions that have key responsibilities toward the implementation of NACAP. In this evaluation exercise, implementing institutions at the national and sub-national levels are counted separately because they may act singularly or collectively to fight or not to fight corruption.

**Political action:** All conduct in which public officials, including legislators, use their official position or political power to positively influence anti-corruption initiatives. It includes intervening on behalf of constituents with any government agency to endorse and pledge support for anti-corruption initiatives.

**Political support:** This involves backing from various segments within the political system, civil society and the general public. Support can come from political parties, organisations and ordinary citizens, who play a role in upholding anti-corruption initiatives. Political support helps to sustain anti-corruption efforts by providing broader buy-in and ensuring that measures are accepted, reinforced and upheld across the system.

**Political will:** The commitment of political leaders and bureaucrats to undertake actions to achieve a set of objectives - in this case, anti-corruption policies and programmes - to sustain the costs of those actions over time (Brinkerhoff, 2000, p. 242<sup>2</sup>).

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<sup>1</sup> National Anti-Corruption Action Plan (NACAP) (2011). NACAP (2015 to 2024). Retrieved: [NACAP](#).

<sup>2</sup> Brinkerhoff, D. W. (2000). Assessing political will for anti-corruption efforts: An analytical framework. Public Administration and Development, 20(3), 239-252.

## INTRODUCTION AND CONTEXT

Corruption is a global threat to sustainable development. It expropriates a country's limited wealth, harms the poor and vulnerable the most, exacerbates inequality and injustice, and undermines national stability through mistrust of citizens for their leaders and institutions. Many developing countries, including Ghana, have implemented several policies and strategies to fight high levels of corruption. Through a wide multi-stakeholder consultative and participatory process, Ghana implemented the National Anti-Corruption Action Plan (NACAP) from 2015 to 2024 aimed at fighting corruption in the country.

## PROJECT DESCRIPTION AND OBJECTIVES

The overall objective of NACAP is to promote and mainstream the values of integrity, transparency and accountability in all sectors of society and ensure effective enforcement of anti-corruption laws in Ghana through prevention, education and capacity-building, and investigation and enforcement approach. Specifically, NACAP seeks, among others, to increase awareness of the linkage between human rights and corruption as well as draw attention to the importance of gender in anti-corruption programming and unregulated discretion in the use of public authority. The Action Plan also seeks to strengthen partnerships with civil society and other non-state actors, including the private sector.

The strategic objectives of NACAP are to:

1. Build public capacity to condemn and fight corruption and make its practice a high-risk, low-gain activity.
2. Institutionalise efficiency, accountability and transparency in the public, private and not-for-profit sectors.
3. Engage individuals, media and Civil Society Organisations (CSOs) in reporting and combating corruption.
4. Conduct effective investigations and prosecution of corrupt behaviour.

## PURPOSE AND SCOPE

The specific objectives of the evaluation were to:

1. Link the outcomes of the NACAP progress reports and evidence that will emerge from the evaluation exercise to ascertain whether the expected output and outcome indicators, as set out in the performance framework, have been achieved.
2. Re-assess the operational philosophy of NACAP.
3. Identify external determinants of the outputs, outcomes and impact of NACAP.
4. Assess the extent to which NACAP has been implemented based on the seven broad themes (evaluation criteria) which are relevance; coherence; effectiveness; efficiency; impact; sustainability; and human rights, gender equality, disability inclusion and leaving no one behind.

The evaluation was also guided by questions under seven evaluation criteria which are relevance, efficiency, coherence, effectiveness, impact, sustainability, and human rights and inclusivity.

## **METHODOLOGY OF THE EVALUATION**

In terms of methodological approach, the evaluation was guided by the theory-based evaluative design and mixed-methods approach. A desk review of relevant reports on NACAP activities enabled the Evaluation Team to fully understand the nature and scope of NACAP activities in order to develop the theory of change, contextualise issues and design the tools for the evaluation.

We collected primary data using qualitative approaches. All the stakeholders, including Lead and Collaborating Institutions, were targeted for the evaluation via semi-structured in-depth interviews. In each institution, special attention was given to generational variations and perspectives, including marginalised groups (i.e., people with disabilities). At the end of the fieldwork, 973 Implementing Partners (IPs) were interviewed across the 17 categories (excluding the citizenry) of implementing institutions. The Evaluation Team also adopted unstructured observation to assess the anti-corruption campaign messages by the various IPs.

With expressed permission and at the convenience of the respondents, each interview was either audio-recorded or detailed hand-written notes were typed out at the end of each day. The National Consultants independently coded all materials thematically using deductive and inductive codes, based on the principles of Grounded Theory.

Various mechanisms were adopted to guide the implementation of the evaluation and ensure quality data. The evaluation adhered to professional standards and ethical principles, including informed consent, privacy, anonymity, confidentiality and impartiality. All the soft copies of the data collected were stored in a password-protected file on a secure laptop. Furthermore, the audio tapes of the interviews were permanently deleted from the recorders, while the Microsoft Word format of the transcripts was saved on a secure laptop. All the data gathered were anonymised as much as practicable before analysing and archiving them.

## **MAIN FINDINGS PER EVALUATION CRITERIA**

### **Relevance**

Generally, the objectives, outcomes and outputs of NACAP were reported to be relevant to Ghana's fight against corruption. NACAP is perceived as relevant to supporting IPs' mandate and enhancing their capacity to fight corruption within their operational framework. Public sensitisation and awareness creation on NACAP, sources and effects of corruption and measures to address acts of corruption contributed to the contextual relevance of NACAP, considering multifaceted factors such as economic, equity, social, cultural and political economy. The evaluation exercise revealed that the IPs generally found that NACAP caused a socio-cultural change in people's perspectives on corruption and measures to combat it. NACAP is considered as a direct response to their priority needs and interests and a complement to their efforts in addressing corruption issues and practices. Considering its constitutional backing to the anti-corruption efforts of different political regimes, NACAP helped to facilitate other legislative provisions such as the creation of the Office of the Special Prosecutor Act, and Economic and Organised Crime Office (EOCO) Act, and Witness Protection Act to better align NACAP activities with relevant institutions and laws in the fight against corruption in the future.

### **Efficiency**

The implementation of NACAP has been quite efficient in driving anti-corruption activities in Ghana, though amidst some challenges. On economic efficiency, it was found that the digitalisation of public services has helped to streamline the operations of public and private sector institutions to improve cost efficiency by

reducing the cost of operations. Some improvements were recorded in operational efficiencies and timelines due mainly to the digitalisation agenda that was integral to the NACAP activities. Specifically, the transition to digital/online systems and services has created a more efficient, transparent and accountable environment for doing public and private businesses, thereby supporting the overall goal of NACAP. The various regulatory practices and internal control measures contributed to closing some sources of revenue leakages and increasing revenue generation within the period of NACAP implementation. However, the NACAP implementation faced challenges such as poor and high cost of internet connectivity, poor staff and customer adaptation and electronic security concerns, which affected the reliability and effective use of electronic systems in the fight against corruption in Ghana.

### **Coherence**

One of the major banes of corruption in Ghana was through human interface in accessing institutional services. As a result, NACAP's efforts to shift most of such interactions to remote or electronic platforms were consistent with the anti-corruption agenda of most IPs, promoting transparency and accountability in their operations. Nonetheless, it was found that more education and structures were required to ensure that the services were accessible to persons from different facets of the country. NACAP activities were also consistent with the internal programmes of the IPs, attributable to the integration of NACAP structures to the institutions such as the appointment of focal persons and internalisation of the audit system as well as the extensive engagement of the IPs on the aims and major activities of NACAP. The operationalisation of NACAP was also consistent with the United Nations Convention Against Corruption (UNCAC), which entreats members to develop an anti-corruption model through preventive policies and the establishment of anti-corruption bodies. Thus, the strategic objectives and broad major activities of NACAP were found to be offshoots from the UNCAC provisions.

### **Effectiveness**

There was a general consensus that NACAP has been quite effective in achieving some of its activities. NACAP has caused some structural transformation in the anti-corruption agenda through the introduction of policy, legal and institutional frameworks to regulate the internal and external operations of both public and private sector organisations to enhance transparency and accountability. The creation or strengthening of anti-corruption institutions such as the Office of Special Prosecution (OSP), Economic and Organised Crime Office (EOCO), Public Procurement Authority (PPA), Internal Audit Agency (IAA), and Public Account Committee of Parliament has facilitated investigations and prosecution of corruption-related cases to deter them from engaging in acts of corruption. However, the high-level awareness among the national and regional representatives of the various stakeholders had not fully transcended to the sub-regional levels. This is likely to affect the effectiveness of NACAP in achieving its objectives since most of the interactions between the institutions and the general populace occur at the sub-regional levels. There was poor protection for whistleblowers and the lack of dedicated funds to reward them, which could discourage the citizenry from actively participating in the anti-corruption fight by providing critical information to unravel corruption practices and acts of corruption.

### **Impact**

NACAP has provided the needed political will, commitment and support and policy direction to enable the IPs to expand their public education and sensitisation agenda on anti-corruption. It has also provided the needed institutional framework for the various anti-corruption agencies to collaborate in the fight against corruption. This has empowered the public sector institutions to effectively interact and manage the private sector institutions by compelling them to conform to laid down procedures, structures and systems to reduce corruption. Some respondents declined to be audio recorded and requested permission from their national offices before participating in the evaluation. This suggests that individuals may not feel empowered to openly discuss corruption and related issues. It also indicates that the impact of NACAP activities has not fully trickled down to the local level.

### **Sustainability**

The implementation of NACAP has made significant strides in raising awareness, promoting transparency, and strengthening institutions in the fight against corruption in Ghana. The appointment of NACAP's focal persons in the administrative structures of the public institutions has been critical in sustaining its operations by ensuring that NACAP's activities are reflected in the programmes of actions of the IPs. However, there was the challenge of non-focal persons (schedule officers) for NACAP designated for the interviews, thus their inability to give full updates on their institutional implementation of NACAP. Other significant challenges that threaten the sustainability of NACAP activities and achievements include adequacy and sustainability of funding for the various activities of NACAP, low political action to fight corruption, inadequate capacity building for staff and focal persons of NACAP and low level of inclusivity and grassroots engagements and empowerment for reporting and fighting corruption in the country. CHRAJ should consciously update its list of focal persons for NACAP to appropriately track the successes and gaps in the implementation of the Action Plan.

### **Human Rights, Gender Equality, Disability Inclusion and Leaving No One Behind**

The passage of the Right to Information Law, Whistleblower Act, and the Witness Protection Act was found to be protecting the fundamental human rights of the citizens in the performance of their civic duties as in the provision of information to unearth corrupt practices and acts of corruption as well as availing themselves as witnesses to effectively prosecute corruption-related cases. The citizens have the civic responsibility to support the course against corruption and, as such, the passage of such laws through NACAP was expected to empower them to demand for proper transparency and accountability from the state institutions.

Similarly, the passage of the Affirmative Action Bill strengthens Ghana's aim of fostering a more inclusive society by addressing gender disparities and promoting equality across various sectors in Ghana. Promoting equal opportunities and eliminating all forms of discrimination is an important stride in the fight against corruption in every society. More practically, several approaches had been adopted by the IPs through NACAP to promote inclusivity, including the establishment of a disability fund, accessibility to public buildings, inclusivity in education and legal representation in courts.

## MAIN CONCLUSIONS

### Relevance

The objectives, outcomes and outputs of NACAP have been perceived as generally relevant to Ghana's fight against corruption under the period 2015-2024. The NACAP activities align with the operational goals, needs and priorities of implementing institutions in addressing corruption issues and practices. Backed by Ghana's Constitution, NACAP transcended one political regime and contributed to combating corruption in Ghana through regulatory and legislative reforms.

### Efficiency

Although the implementation of NACAP has been fairly efficient in promoting transparency, accountability, integrity and convenience in accessing public services through digitisation, it was faced with challenges, including poor and high cost of internet connectivity, poor staff and customer adaptation and electronic security concerns. This reduces the reliability and effective use of electronic systems as part of efforts to fight corruption in Ghana and promote national development.

### Coherence

NACAP activities were consistent with the anti-corruption efforts of most of the IPs and with their internal programmes and practices in addressing issues of corruption. Similarly, the activities of NACAP are consistent with the frameworks of external agencies such as UNCAC and Sustainable Development Goals (SDGs). Thus, the strategic objectives and broad major activities of NACAP were found to be offshoots from the UNCAC provisions.

### Effectiveness

There was a general consensus that NACAP has been quite effective in achieving its activities. However, the high-level awareness among the national and regional representatives of the various stakeholders had not fully transcended to the sub-regional levels. Even though NACAP activities have helped in mainstreaming anti-corruption ethics and integrity in all sectors of the society, it is yet to yield the needed outcomes.

### Impact

Across the four strategic objectives and 135 activities of NACAP, the evaluation has revealed that the implementation of NACAP has made appreciable impact in building capacity to condemn and fight corruption, institutionalising efficiency, accountability and transparency, engaging individuals, media and CSOs in reporting and combating corruption, and conducting effective investigation and prosecution of corrupt conduct in Ghana. With continuous and aggressive efforts, these impacts could be sustained beyond the lifespan of NACAP, where citizens and public and private officials see corruption as a high-risk, low-gain activity.



## **Sustainability**

Although the implementation of NACAP has made significant strides in fighting corruption and corruption related offences, major challenges threaten the sustainability of the Plans. These challenges relate to the adequacy and sustainability of funding for the various activities of NACAP, low political action to fight corruption, inadequate capacity building for staff and focal persons of NACAP, and low level of inclusivity and grassroots engagements and empowerment for reporting and fighting corruption in Ghana.

## **Human Rights, Gender Equality, Disability Inclusion and Leaving No One Behind**

Central to the implementation of the activities of NACAP are issues of human rights, gender equality and inclusion of vulnerable groups such as persons with disability. Therefore, the passage of the Right to Information Law, the Witness Protection Act, and Affirmative Action Bill marks significant milestones in protecting the rights and freedoms of the vulnerable populations in Ghana. Another achievement is the development of the Persons with Disability Amendment Bill (2020).

# **MAIN RECOMMENDATIONS**

## **RECOMMENDATION 1 – SUSTAINABLE FUNDING FOR NACAP ACTIVITIES**

The implementation of NACAP has faced some financial constraints, which have affected its effectiveness. The financial resource constraints have been reported in most of the Annual Progress Reports of CHRAJ and also during the evaluation exercise. Therefore, CHRAJ should spearhead the securing of long-term funding for anti-corruption initiatives. The Ministry of Finance should also enforce its directive requesting all covered institutions to include anti-corruption measures in their budgets and integrate them into their programmes and operations in their budget estimates in line with NACAP. In this regard, CHRAJ should facilitate the establishment of a NACAP Fund to support the implementation of NACAP activities across the various sectors of the economy. Developing and implementing a comprehensive plan or strategy to address these concerns are, therefore, imperative to sustain the gains achieved through digitisation to combat corruption.

## **RECOMMENDATION 2 – STRONGER POLITICAL ACTION**

The success of anti-corruption efforts depends on strong political will, commitment, support and action at all levels of government. CHRAJ should ensure that political leaders are committed to implementing anti-corruption policies. Regular public statements from the highest levels of government reaffirming zero tolerance for corruption and demonstrating transparency and accountability can set a right tone of integrity across the public sector. Thus, NACAP II should consider prioritising political action regarding funds and other resources for integrity and accountability.

## **RECOMMENDATION 3 – INCLUSIVITY AND GRASSROOTS ENGAGEMENT**

CHRAJ, as the coordinating agency of NACAP implementation, should make conscious efforts to engage more with local communities, traditional authorities and marginalised groups to ensure that anti-corruption initiatives are relevant and impactful at all levels. To achieve this, it is recommended that more resources should be dedicated to education and awareness campaigns, with a focus on making these efforts more accessible and engaging for the wider population.

## RECOMMENDATION 4 – CONTINUOUS CAPACITY BUILDING

Capacity building of Focal Persons (Schedule Officers) should be an integral part of the implementation of future NACAP, and not on ad hoc basis. CHRAJ should design a standard schedule of training and capacity building programmes for the Focal Persons throughout the implementation of NACAP. CHRAJ should also lobby for NACAP Focal Persons to be made a designated portfolio within the administrative structures of the public implementing institutions, especially Ministries, Departments and Agencies (MDAs) and Metropolitan, Municipal and District Assemblies (MMDAs). This will ensure that even if they are transferred to different regions or districts, they will continue to perform the same functions rather than being given a different schedule outside NACAP activities. It is also recommended that CHRAJ consciously update its list of Focal Persons for NACAP to appropriately track the achievements and challenges in the implementation of the Action Plan.

## RECOMMENDATION 5 – DESIGNING OF NACAP II

In the design of NACAP II, CHRAJ and relevant stakeholders should incorporate a theory of change and a mid-term evaluation to identify successes and weaknesses that will shape the remaining years of its implementation.

Beyond population-based corruption surveys, NACAP II should also institutionalise institution-based corruption surveys to unearth context-specific issues for redress. This will provide a comprehensive perspective of the state and nature of corruption in the country to shape the design and implementation of strategies to deal with it.

Finally, anti-corruption strategies should be integrated into the strategic plans and policy documents. Our review indicated that anti-corruption activities were not an integral part of these strategic documents that drive the vision of the institutions.

## MAIN LESSONS LEARNED AND GOOD PRACTICES

The implementation of the Ghana NACAP has provided valuable insights into the complexities of fighting corruption in Ghana. Key lessons that may inform the development of future NACAP are as follows:

1. **Broad consultation:** The development of NACAP involved broad consultations with arms of Government, MDAs, MMDAs, Private Sector, Civil Society, Academia, Leaders of the Faith, and Traditional Authorities as well as Regional Consultations. This engendered general acceptance of the NACAP document and its activities.
2. **Strong monitoring and coordination:** The NACAP document has strong monitoring and evaluation mechanisms for tracking progress and challenges such as HiLIC, Monitoring Committee (Monicom) and NISU. However, more resources should be allocated to HiLIC, Monicom and NISU for an improved monitoring exercise.
3. **Role of media, civil society and the ordinary citizens:** NACAP recognised the crucial role of a wide range of stakeholders, including the media, CSOs and ordinary citizens, and these are well integrated into its framework.

# I. INTRODUCTION

## BACKGROUND AND CONTEXT

Corruption hinders a nation's sustainable development, exacerbates poverty and threatens human rights. Consequently, many developing countries, including Ghana, have implemented several policies and strategies to fight high levels of corruption. For example, Ghana has ratified several international protocols and instruments on corruption, including the United Nations Convention Against Corruption (UNCAC) in 2005, African Union Convention on the Prevention and Combating of Corruption in 2005, and ECOWAS Protocol on the Fight Against Corruption in 2003. Ghana also promulgated laws and established government and quasi-institutions with the sole mandate to investigate and prosecute corruption-related issues. The Commission on Human Rights and Administrative Justice (CHRAJ) was established partly to provide free advice and services on corruption prevention in Ghana. Furthermore, the Criminal Offences Act 1960 (Act 29), popularly known as the Criminal Code, criminalises corruption in the form of active and passive bribery, extortion, wilful exploitation of public office, use of public office for private gain and bribery of foreign public officials. There is also a Code of Conduct for Public Officers and the Civil Service Act which provides guidelines on conflicts of interest for civil servants. Despite all these provisions and efforts to control corruption in Ghana, acts of corruption were still thriving.

Subsequently, Ghana deepened its fight against corruption by designing and implementing the National Anti-Corruption Action Plan (NACAP) from 2015 to 2024 as a comprehensive strategy to effectively tackle corruption. The multi-stakeholder consultative and participatory approach to developing and implementing NACAP generated a greater sense of collective responsibility to combat corruption in Ghana. NACAP conceptualises corruption as "the misuse of entrusted power for private gain through bribery, embezzlement, misappropriation, trading in influence, abuse of office, abuse of power, illicit enrichment, laundering of proceeds of crime, concealment, obstruction of justice, patronage, nepotism and conflict of interest" (NACAP, 2011, p. 24)<sup>3</sup>.

The overall objective of NACAP is to promote and mainstream the values of integrity, transparency and accountability in all sectors of society and ensure effective enforcement of anti-corruption laws in Ghana through prevention, education and capacity-building, and investigation and enforcement approach. Specifically, NACAP seeks, among others, to increase awareness of the linkage between human rights and corruption as well as draw attention to the importance of gender in anti-corruption programming and unregulated discretion in the use of public authority. It also seeks to strengthen partnerships with civil society and other non-state actors, including the private sector.

The strategic objectives of NACAP are to:

1. Build public capacity to condemn and fight corruption and make its practice a high-risk, low-gain activity.
2. Institutionalise efficiency, accountability and transparency in the public, private and not-for-profit sectors.

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<sup>3</sup> National Anti-Corruption Action Plan (NACAP) (2011). NACAP (2015 to 2024). Retrieved [NACAP](#)

3. Engage individuals, media and Civil Society Organisations (CSOs) in reporting and combating corruption.
4. Conduct effective investigations and prosecution of corrupt behaviour.

NACAP sets out to achieve 135 broad activities categorised into short-term (1-2 years), medium-term (3-5 years) and long-term (6-10 years) under the four strategic objectives. Regarding the strategic objectives, the Action Plan aimed to achieve 28 activities under Objective 1, 45 under Objective 2, 16 under Objective 3 and 46 under Objective 4. The implementation of NACAP lies with the High-Level Implementation Committee (HiLIC), Monitoring Committee (Monicom), Commission for Human Rights and Administrative Justice (CHRAJ), which plays a coordinating role, and Implementing Partners (IPs). NACAP targeted the Executive Arm of Government, Ministries, Departments and Agencies (MDAs), Metropolitan, Municipal and District Assemblies (MMDAs), Parliament, Judiciary, Anti-Corruption and Law Enforcement Agencies, Independent Government Institutions, Media, CSOs, Private Sector Organisations, Development Partners, Political Parties, Academia, Leaders of the Faith, Traditional Authorities, and the General Public. To improve cultural diversity and participation in its implementation, NACAP prioritised gender, inclusivity and human rights integration, and a fair representation of marginalised and vulnerable groups such as women, children, persons with disabilities and the poor.

A total of USD 65,640,000.00 was earmarked for the various activities under NACAP. An amount of USD 26,950,000.00 was allotted to implement Objective 1 activities, USD 21,375,000.00 for Objective 2 activities, USD 5,300,000.00 for Objective 3 and USD 12,015,000.00 for Objective 4 activities.

As the implementation of NACAP ends in 2024, a final independent evaluation was necessary to assess the achievement of the Action Plan and document lessons drawn, experiences and insights gained from the implementation of NACAP to inform its future design and development, and the rollout of similar plans in Ghana and other countries in Africa. The evaluation covered the context within which NACAP was conceptualised, developed, approved and implemented to assess its outcomes.

The specific objectives of the evaluation were to:

1. Link the outcomes of the NACAP progress reports and evidence that will emerge from the evaluation exercise to ascertain whether the expected output and outcome indicators, as set out in the performance framework, have been achieved.
2. Re-assess the operational philosophy of NACAP.
3. Identify external determinants of the outputs, outcomes and impact of NACAP.
4. Assess the extent to which NACAP has been implemented based on the seven broad themes (evaluation criteria) which are relevance; coherence; effectiveness; efficiency; impact; sustainability; and human rights, gender equality, disability inclusion and leaving no one behind.

## PURPOSE AND SCOPE

The process followed the evaluation criteria defined by the Organisation for Economic Cooperation and Development/Development Assistance Committee (OECD DAC), which are relevance, coherence, efficiency, effectiveness, impact and sustainability. In addition, the United Nations System-Wide Action Plan (UN-SWAP) requirements used by the United Nations Office on Drugs and Crime (UNODC) concerning human rights, gender equality and inclusivity were adopted.

In terms of geographical scope, the evaluation covered all the 16 regions of Ghana (see Figure 1). It also covered IPs, political parties, CSOs and the general public. The findings and recommendations of the independent final evaluation of Ghana’s NACAP are expected to contribute to addressing any identified gaps in the Action Plan, and guide the development and implementation of NACAP 2 and other similar plans. It is also anticipated that the lessons drawn from this evaluation will inform strategies and action plans of other African countries.

The findings and recommendations of this final evaluation of Ghana’s NACAP will be useful to the Government of Ghana, policymakers, anti-corruption practitioners, law-enforcement and prosecutorial authorities, civil society, private sector organisations, development partners, academia, media and the general public to contribute to the fight against corruption.



Figure 1: Map of Ghana showing its 16 Administrative Regions and their Capitals

## THE COMPOSITION OF THE EVALUATION TEAM

The Evaluation Team comprised the Evaluation Manager (Professor Samuel Kobina Annim, who doubles as the Government of Ghana Statistician), National Consultants (Professor Simon Mariwah and Dr. Millicent Abigail Aning-Agyei) and International Evaluation Advisors (Dr. Marianne Camerer, who is an anti-corruption expert; and Sofia Guillot, who is an evaluation expert). The Ghana Statistical Service (GSS) partnered with National Consultants to guarantee some level of independence in the evaluation, as GSS, as a national

institution, could not evaluate itself. The Independent Evaluation Section (IES) of UNODC provided technical support during the final evaluation. The inclusion of the International Evaluation Advisors and UNODC brought international perspectives to the evaluation exercise.

The Team also received technical assistance from Dr. Prince George Aning-Agyei. Administrative support was provided by GSS (Omar Seidu, Jane Geraldo-Acolatse and Kwamina Issifu) and CHRAJ (Stephen Azantilow and Amanda Kasim).

## EVALUATION METHODOLOGY

### Evaluation Design and Approach

The evaluation was guided by the theory-based evaluative design and mixed-methods approach. The Evaluation Team first undertook a desk review of relevant documents such as books, published and unpublished reports on NACAP activities. The desk review ultimately enabled the team to fully understand the nature and scope of NACAP activities in order to establish the Theory of Change (ToC), design and contextual issues. Secondly, primary data were collected using qualitative approaches such as interviews and observations. Based on the seven evaluation criteria, the Consultants developed a ToC (Figure 2) to guide the evaluation.

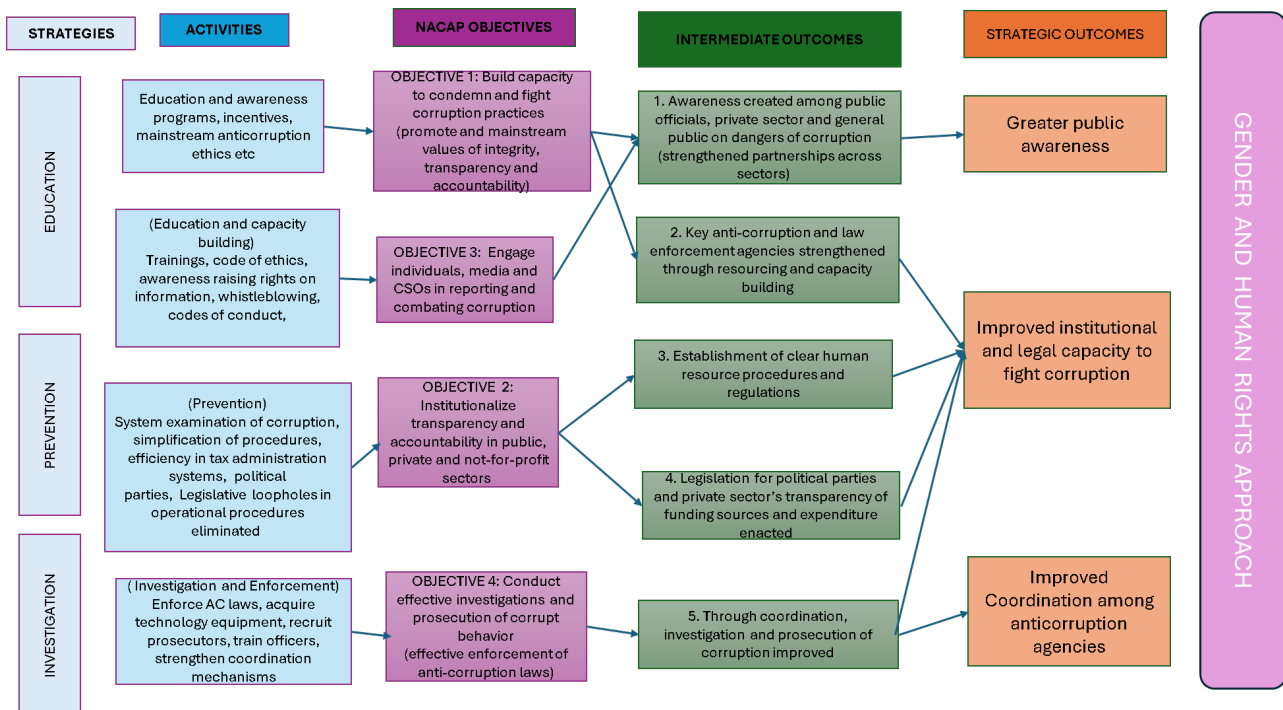


Figure 2: Theory of Change for the NACAP Evaluation Exercise

Source: Evaluation Team, 2024

The effective implementation of NACAP requires the implementation of specific activities directed at addressing the root causes that create a conducive environment for corrupt practices to thrive in public administration and governance in Ghana. Accordingly, the ToC specifies the relationship between the strategies or the activities of NACAP and the intended impact. It outlines the pathways through which the NACAP activities will lead to specific outcomes and long-term impact. The underlying assumptions of the ToC were that the planned activities of NACAP will be successfully implemented and there will be political will,

commitment, support and action to deepen the fight against corruption. These efforts are expected to lead to the proposed strategic outcomes of greater public awareness, improved institutional and legal capacity to fight corruption and improved coordination among anti-corruption agencies. Ultimately, these outcomes are expected to increase accountability from public, private and not-for-profit sectors, and increase citizen monitoring of programmes and activities by public, private and not-for-profit sectors, which will lead to long-term impact of reduced corruption and corruption-related practices.

### Sampling and Data Collection

In line with the study design, both qualitative and quantitative data were collected to allow for data triangulation that comprehensively addresses the objectives of the evaluation. The Evaluation Team reviewed all NACAP Annual Reports and other relevant documents to guide the evaluation tool design and inform the evaluation. All implementing institutions (IPs) were targeted for the evaluation. The NACAP document categorises IPs into Lead and Collaborating Institutions. All the stakeholders, including Lead and Collaborating Institutions, were targeted for the evaluation for semi-structured in-depth interviews. At the end of the fieldwork, 973 IPs were interviewed across the following 18 categories of institutions:

1. Office of the President
2. Parliament
3. Judiciary
4. Anti-Corruption and Agencies/Key Accountability Institutions
5. MDAs, MMDAs, and Other Public Sector Institutions (OPSIs)
6. Independent Governance Institutions
7. State Interest and Governance Authority (SIGA) and State-Owned Enterprises (SOEs)
8. Financial Sector Institutions
9. Private Sector
10. Media
11. Civil Society Organisations (CSOs) and Non-Governmental Organisations (NGOs)
12. Traditional Authorities
13. Faith-Based Organisations (FBOs)
14. Political Parties
15. Development Partners
16. Educational Institutions
17. Citizenry
18. Labour Unions

Table 1 presents the distribution of the institutions that participated in the interviews across the 16 administrative regions of the country.

**Table 1: Number of Institutions that Participated in the Interviews by Region**

Region	Number of institutions
Western	32
Central	60
Greater Accra	144
Volta	51
Eastern	78
Ashanti	164
Western North	62
Bono	36
Ahafo	24
Bono East	64
Oti	32
Northern	43
Savannah	26
North East	19
Upper East	59
Upper West	79
<b>Total</b>	<b>973</b>

Source: Fieldwork, 2024

Finally, the Evaluation Team adopted unstructured observation to assess the anti-corruption campaign messages by the various IPs. Some IPs also invited the Team to observe their discussions and reporting mechanisms while preparing their report on their annual work plans.

### Data Analysis

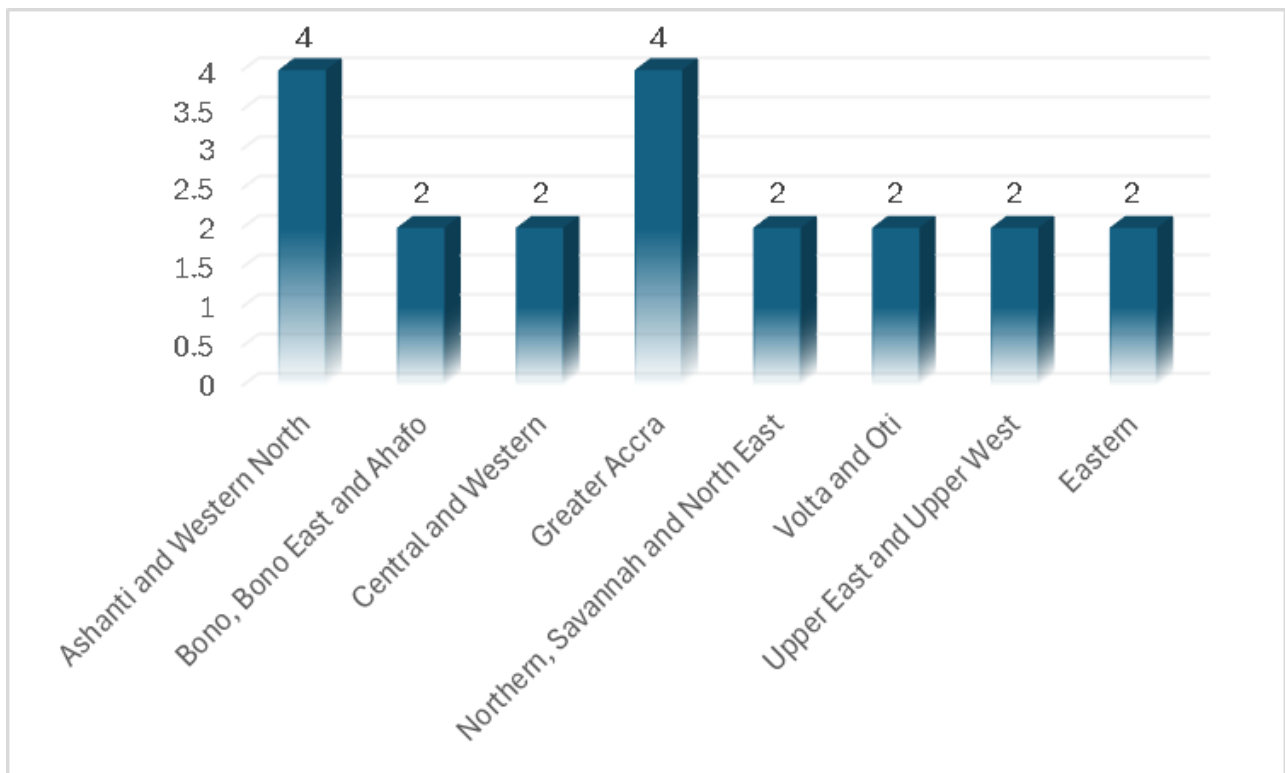
In line with the standards and norms of qualitative data collection and analysis, participants were initially contacted and interviews arranged at their convenient time and place. With expressed permission and at the



convenience of the respondents, each IDI was either audio-recorded or detailed hand-written notes typed up at the end of each day. The Consultants independently coded all materials thematically using both deductive and inductive codes, based on the principles of Grounded Theory. The coding framework and thematic analysis were linked to the interview guides, themes discussed and the objectives of the evaluation. This enabled the Consultants to read across the data and provide a cross-institutional comparative analysis from the different institutions. Photographs and general observations during the interviews were used to support the findings of the interviews.

**Recruitment and Training of Field Staff**

Together with GSS, the Evaluation Team recruited and trained 20 research assistants to assist in data collection. The minimum qualification for recruitment of the research assistants was a graduate degree, experience in evaluation and qualitative data collection, accurate transcription of qualitative data as well as familiarity with research ethics. The Evaluation Team Members were the core facilitators of a two-day training programme for the research assistants that took place on 6-7 June 2024 in Accra. The training covered issues relating to the objectives of the evaluation, evaluation instruments, research ethics, role plays, communication channels, roles of research assistants, anticipated challenges and how to resolve them. A service and non-disclosure agreement was signed by all the research assistants. Figure 3 shows the distribution of research assistants in teams for data collection across the 16 regions of Ghana.



**Figure 3: Distribution of Research Assistants for Data Collection across Region**

Source: Fieldwork, 2024

### Reporting and Review Process

The National Evaluation Team produced Draft and Final Reports of the Evaluation. HiLIC, the International Evaluation Advisors and UNODC reviewed and provided comments on the draft report and submitted the same to the Team. The Team then incorporated the comments into the report and submitted a revised final draft report to the Client to review the final draft to ensure compliance with standards and all necessary details. The evaluation report was structured to include an Executive Summary, Background to the evaluation, Objectives, Methods, Analysis of findings, Lessons learnt, Stories of change, Conclusions and Recommendations.

### Data Management and Quality Assurance

The Consultants adopted various mechanisms to guide the implementation of the evaluation and ensure quality data. The evaluation adhered to professional standards and ethical principles, including informed consent, privacy, anonymity, confidentiality and impartiality. Aside from the National Consultants, monitoring teams from GSS, CHRAJ and HiLIC ensured that the data collected were of optimal quality.

All the soft copies of the data collected were stored in a password-protected file on a secured laptop. Furthermore, the audio tapes of the interviews were permanently deleted from the recorders, while the Microsoft Word format of the transcripts was saved on a secure laptop. All the data gathered were anonymised as much as practicable before analysing and archiving them.

### Independence of the Evaluation Process

The evaluation process was deemed independent because of the following:

- Independence of the evaluation team: The team was not involved in the design, development and implementation of NACAP and is part of the academic sector.
- Participation of the Independent Evaluation Section of UNODC: This strengthened the independence of the evaluation exercise and added more credibility.
- Independence of the process: The evaluation adopted scientific and rigorous evaluation methods (triangulation of both methods and instruments) and processes to guarantee its independence and credibility.

## LIMITATIONS OF THE EVALUATION

Like every evaluation, this final evaluation of Ghana’s NACAP has some limitations but measures were taken to address them to mitigate their impact on the evaluation (see Table 2).

**Table 2: Limitations of the Evaluation and Mitigation Measures**

Limitations to the evaluation	Mitigation measures
Limited cooperation and engagement from the implementing institutions to provide relevant information for the evaluation.	1. A national launch of the evaluation was organised in December 2023 to improve sensitisation of the final evaluation and response rate

## THE GHANA NATIONAL ANTI-CORRUPTION ACTION PLAN [NACAP: 2015-2024]

	<ol style="list-style-type: none"> <li>2. CHRAJ and HiLIC of NACAP reached out to IPs for their cooperation in the evaluation</li> <li>3. The Team embarked on public sensitisation of the evaluation to improve response rate</li> <li>4. Press Statement by GSS to encourage participation in the evaluation exercise</li> <li>5. The Team extended the period of data collection to allow for more time</li> </ol>
<p>Less than a week into the qualitative data collection, there was a nation-wide industrial action by the members of the Civil and Local Government Staff Association of Ghana (CLOGSAG) from 3rd to 12th July 2024 and later by Organised Labour Unions. This made some respondents reluctant to participate in the evaluation during the strike period, thus delaying the data collection.</p>	<ol style="list-style-type: none"> <li>1. To ensure adequate time for data collection, the Team extended the period to cover the lost days due to the strike</li> <li>2. Obtained permission to visit participants at agreed locations (outside office premises) to collect data for the evaluation</li> </ol>
<p>Delayed release of funds affected the timely implementation of the evaluation.</p>	<p>The Evaluation Team continued to develop the evaluation protocols (inception reports, methodologies and data collection instruments) in order to avoid further delays when the funds were released</p>
<p>Limited knowledge of NACAP and the absence of an institutional Focal Person for NACAP.</p>	<p>Such interviews were conducted with reference to corruption and anti-corruption activities and measures without direct mention of NACAP</p>

Source: Fieldwork, 2024

## II. EVALUATION FINDINGS

The findings from this evaluation are presented based on the evaluation criteria defined by the OECD DAC and the United Nations System-Wide Action Plan (UN-SWAP) requirements used by UNODC concerning human rights and inclusivity. The criteria comprise relevance, coherence, efficiency, effectiveness, impact, sustainability, and human rights and inclusivity.

### RELEVANCE

This criterion explores the extent to which the activities and principles of NACAP align with the needs and priorities of the stakeholders. The aim was to ascertain whether the implementation of NACAP supported the ordinary course of operations of the IPs. The findings under this section have been organised around key themes: responsiveness to needs, policies and priorities, sensitivity and responsiveness to specific context, and adaptation over time. The section also analyses the quality of design of the NACAP.

#### EVALUATION QUESTIONS:

1. To what extent has NACAP been relevant to stakeholders' needs and priorities?
2. How do stakeholders perceive the relevance of NACAP in reducing or combating corruption in Ghana?
3. To what extent was NACAP designed in a result-oriented, inclusive and participatory manner?
4. To what extent are the outcomes, outputs and activities of NACAP relevant to achieving its objectives?

### RESPONDING TO NEEDS, PRIORITIES AND POLICIES

The 1992 Constitution of Ghana acknowledges the importance of anti-corruption efforts. Specifically, Article 35(8), under the Directive Principles of State Policy, states that '*The State shall take steps to eradicate corrupt practices and the abuse of power*'. In addition, Ghana has ratified several international protocols and instruments related to anti-corruption such as the United Nations Convention Against Corruption (UNCAC) in 2005, African Union Convention on the Prevention and Combating of Corruption in 2005, and the Economic Community of West African States (ECOWAS) Protocol on the Fight Against Corruption in 2003. The development of NACAP was, therefore, to actualise the various tenets and provisions in these instruments.

The IPs were asked to indicate the extent to which NACAP responded to their needs, priorities and policies. The interviews revealed that the IPs generally perceived NACAP as a crucial document that supports their mandate and enhances their capacity to address corruption within their operational framework. The IPs acknowledged corruption as a bane to their growth and development and, as such, NACAP was considered to be a direct response to their need and a complement to their efforts in addressing issues of corruption.

It was generally mentioned by the IPs that the implementation of NACAP had contributed to addressing some of their distinctive needs. For example, a representative of one of the public sector institutions reported as follows:

*NACAP's anti-corruption measures have helped the National Disaster Management Organisation (NADMO) to maintain integrity by ensuring that all items sent for distribution are accounted for properly.*

It was reported that NADMO has instituted a tracking, verification and reporting system to effectively monitor distributions across its warehouses, and between the warehouses and disaster victims to enhance transparency and proper accountability. Thus, NADMO has developed an assessment system, comprising unit assessment, damage assessment, community engagement, data verification, needs assessment and follow-up assessment to ensure that the support received by the disaster victims tallies with the records from their warehouses. The implication is that NACAP, with its focus on accountability, has contributed to introducing new systems of accountability to the fight against corruption. This accountability was crucial to prevent any misappropriation of resources, which could have undermined the organisation's mission to assist disaster victims effectively.

A representative of a development partner also admitted that NACAP has been instrumental in implementing their programmes in areas of business and trade advocacy. The development partner noted that much of the advocacy work carried out by the organisation has been aided by the NACAP's activities, and that NACAP has provided valuable support and resources to enhance their advocacy initiatives. It was also reported by a representative of a public sector institution that, through its adherence to the principles of NACAP, the institution has transitioned from paper-based operations to paperless processes to improve tax compliance and revenue generation. Other issues of responsiveness to the needs, priorities and policies of the stakeholders were mentioned by the IPs, including the implementation of shared financial signatories to promote checks and balances, and salary validation to eliminate ghost names from the government payroll. For example, a representative of a public sector institution stated:

*The directorate ensures that financial signatories are not limited to just the directorate staff. We include signatories from the health facilities as well, which helps in preventing any single individual from having unchecked control over finances. This had been a major operational challenge of the directorate for years. But with the current system, there is proper accountability and transparency in the management of funds.*

In sum, the interviews revealed that the IPs generally perceived NACAP as relevant to their operations. This suggests that the tenets of NACAP were generally necessary for the effective functioning of the institutions.

### SENSITIVITY AND RESPONSIVENESS TO SPECIFIC CONTEXT

NACAP was developed to address some of the critical factors that led to the failure of the previous anti-corruption efforts of the government. As a result, the Action Plan stressed on public education and sensitisation for the people to appreciate the underlying social, cultural and economic issues promoting acts of corruption in public administration. This section considered multifaceted factors such as economic, equity, social, cultural and political economy that have become the bane for corruption in the country.

From the evaluation exercise, the IPs generally indicated that NACAP responded to social and cultural efforts in fighting corruption. Some of the institutional representatives reported that the public sensitisation and awareness creation aspect of NACAP on the sources and effects of corruption as well as the measures to address acts of corruption were all part of their agenda to cause a socio-cultural change on people's perceptions on corruption. They added that NACAP provided a structured programme of activities and common understanding for different institutions to collaborate in the fight against corruption. This suggested that the implementation of NACAP was relevant in supporting the mandate of the various institutions in addressing the socio-cultural dimension of corruption. This was important because some of the IPs perceived the socio-cultural element as one of the main driving forces of corruption.

In relation to economic relevance, some of the institutional stakeholders attested to the fact that the implementation of some of the strategies of NACAP has led to increased revenues and accountability. For example, some representatives of the public sector institutions reported that their institutions have implemented various software and online payment methods to minimise corrupt activities, improve transparency and accountability in revenue collection and increase tax compliance. Some other revenue generating institutions such as the Passport Office and the Lands Commission added that the use of digital documentation, online payment system and reduction in physical interaction with clients had increased revenue generation, promoted fairness and eased access to their services. Further, the representatives of private financial institutions attested to the operational challenges they encountered prior to the digitalisation of their operations, which created avenues for favouritism and corruption. They, however, acknowledged how the operationalisation of the strategies of NACAP has contributed to increase convenience, record keeping, time savings and communication in their service delivery. This shows the extent to which NACAP has promoted transparency and accountability in the interactions between the general populace, and key state agencies and private sector institutions.

### ADAPTATION OVER TIME

This dimension of relevance measures the capacity of an intervention to respond to changes in critical circumstances over the course of its implementation and still remain relevant to the beneficiary stakeholders. The evaluation exercise considered the adaptability of NACAP activities across different political regimes over its course of implementation. This was because the implementation period of NACAP has transcended across two political regimes (2015-2016 for National Democratic Congress; and 2017-2024 for New Patriotic Party) with different ideologies.

Most of the IPs admitted that NACAP has remained relevant across the political regimes. Some of the representatives of CHRAJ attributed this strong adaptation of NACAP activities across the political regimes to the constitutional basis for the Plan. One of the representatives of the independent governance institutions had this to say:

*NACAP was developed pursuant to Article 35(8) of the 1992 Constitution of Ghana and in line with several international instruments that Ghana has ratified over the years such as the United Nations Convention Against Corruption (UNCAC), African Union Convention on the Prevention and Combating of Corruption, and the ECOWAS Protocol on the Fight Against Corruption. NACAP is, therefore, considered as a direct activation of the constitutional provision and the international instruments. As a result, various governments feel committed to ensuring its success.*

The result shows that the constitutional backing to the anti-corruption efforts contributed to its successful adaptation across different political regimes. Thus, some representatives of the independent governance institutions mentioned that the constitutional backing helped to facilitate other legislative provisions such as the creation of the Office of the Special Prosecutor Act, and Economic and Organised Crime Office (EOCO) Act, Witness Protection Act, among other institutional legislative reforms to enable NACAP activities to better align with relevant institutions and laws in the fight against corruption in the course of time.

Other IPs from the independent governance institutions, state interest governance authority and state-owned enterprises, and public sector institutions also mentioned that corruption is one of the fundamental challenges of the Ghanaian society, and every government feels compelled to continue to implement policies and programmes to address it to win public support. In other words, the continuous implementation support for

NACAP over the period was partly attributed to the social contract between the citizens and the government to protect the resources of the country.

The evaluation exercise further found that the fusion of the NACAP's implementation structures into existing state institutions and structures with clear mandates and responsibilities as well as the appointment of focal persons in the various institutions contributed significantly to the successful adaptation of NACAP across different political regimes. In other words, the clear disassociation of the implementation of NACAP from political party structures and the utilisation of state institutions contributed to making the programme apolitical, which has enabled it to remain relevant across different political regimes. This suggests that the continuous use of apolitical structures and institutions to drive forward the implementation of NACAP is essential for it to remain relevant across the major political divide and also enable it to adapt effectively to address the changing course of corruption.

### QUALITY OF DESIGN

Many of the IPs indicated that the strategic objectives and the major actions of NACAP were in direct response to their operational challenges. This suggests that the design of NACAP was relevant to the priorities and needs of the IPs. It was also found from the evaluation exercise that the broad base of the NACAP strategic objectives and the major actions helped to meet the priority needs and interests of different IPs. Some representatives of the implementing institutions, independent governance institutions, reported that NACAP's major actions added more clarity to the strategic objectives by making them targeted to peculiar needs and avenues in the fight against corruption. This could be attributed to the broad-based strategies for the development of NACAP, comprising education, prevention and investigations, as shown in the theory of change. Thus, the design of NACAP identified the major sources of corruption in Ghana and developed specific strategies to address them.

### EFFICIENCY

This evaluation criterion measured how well resources have been utilised under the implementation of NACAP. This criterion was organised under:

- Economic efficiency: Analyses the extent to which the implementation of NACAP has helped to reduce the cost of operations in public services and cost efficiency in the anti-corruption agenda.
- Operational efficiency: Explores how well resources were used in the implementation of NACAP. It is measured in terms of the level of alignment between the programmes or budgets of the IPs and their operational goals or mission.
- Timeliness in relation to the operations of NACAP: Assesses the timeliness in achieving results as well as the time savings associated with the NACAP implementation.

#### EVALUATION QUESTIONS:

1. To what extent has NACAP efficiently delivered regarding the implementation strategies and use of resources (e.g., education and capacity-building materials, funds)?
2. To what extent are the strategies and activities of NACAP cost-effective and timely implemented/delivered to meet expected standards?

Before presenting the economic and operational efficiency of NACAP based on definitions above, it has to be clarified that even though there was explicit mention of a total of USD 65,640,000.00 earmarked for the various activities under NACAP, so far, there is no concrete information on the actual amount released towards the implementation of NACAP. This presents a difficult challenge in evaluating the efficiency of the use of financial and other resources for the NACAP and its related activities.

### ECONOMIC EFFICIENCY

One of the major activities in the design of NACAP, as shown in the theory of change, was prevention. Some of the elements designed to prevent corruption were system examination of corruption, simplification of procedures, and efficiency in tax administration. It was reported by some of the implementing institutions, independent governance institutions, and anti-corruption and law enforcement agencies, that digitalisation was considered a major avenue to reduce public sector corruption by improving efficiency. It was found that the digitisation of public services has helped to streamline their operations to improve cost efficiency by reducing the cost of operations of both public and private sector institutions. For example, a representative of one of the independent governance institutions had this to say:

*The digitalisation of our services has helped to simplify processes such as applications for licences and renewals. This has contributed to reducing the time and resources required for these transactions, which can diminish the motivations for corrupt behaviours. The reduction in the need for physical infrastructure and personnel for in-person services has led to cost savings for the institution. These resources are now redirected towards anti-corruption initiatives and capacity building to further improve our services.*

The excerpt above illustrates how the transition to digital/online systems and services has created a more efficient, transparent and accountable environment for doing business (both public and private), thereby supporting the overall goal of NACAP. It was found that corruption thrived during in-person exchanges, which is also costly to operate as the institutions are required to establish more offices and employ additional staff to serve the public more effectively. As a result, the digitalisation efforts have helped to reduce the additional cost of establishing the offices and employing staff to manage the offices. NACAP's strategic efforts in addressing corruption through technological innovations have provided some cost savings to the IPs. Thus, the ToC that guided the implementation of NACAP indicated the utilisation of technology as part of the strategies and activities to be leveraged to address issues on corruption. Representatives from other IPs also highlighted similar cost-saving benefits, emphasising that both institutions and clients experienced savings as the public spent less time accessing services through the electronic systems.

A participant from an academic institution described how the implementation of policies and internal controls in the colleges of education has helped them achieve value for money. Following the procurement regulations and internal audit systems instituted by NACAP, the evaluation found that many institutions saw the need to conduct a value-for-money audit before certain projects could be implemented. This procurement and audit requirement was found to compel IPs to compare various receipts and invoices regarding the quality and size of projects before making a determination on either the project or the vendor to execute the project. Thus, the strategic objective two of NACAP sought to institutionalise transparency and accountability in public administration. Accordingly, the various auditing and control measures instituted in the public sector to prevent corruption were part of the actualisation of the strategic objective.

By increasing digitisation efforts to address anti-corruption issues, some of the revenue-generating institutions acknowledged that there has been an increase in their revenue generation. This suggests that the



digitalisation agenda has succeeded in closing some of the sources of revenue leakages. For example, a representative of one of the public sector institutions (PSI) reported that the organisation has instituted a performance tracker system for its operational and financial performance, which showed an increase in revenue generation. Thus, the various regulatory practices and internal control measures have resulted in increasing revenue generation over the period. The representative added that monies which would have gone to individuals are now coming into the coffers of the Ghana Revenue Authority, showing an important achievement in the implementation of NACAP.

### OPERATIONAL EFFICIENCY

This section explored how well resources were used in the implementation of NACAP. It was measured in terms of the level of alignment between the programmes or budgets of the IPs and their operational goals or mission. The evaluation revealed that NACAP has prompted the IPs to adopt the Medium-Term Expenditure Framework (MTEF), requiring public institutions to link their budgets to the achievement of clear policy goals and objectives. This was in line with the second strategic objective of institutionalising transparency and accountability in public sector administration. With the implementation of MTEF, projects, programmes, activities and services should clearly be linked to the policy goals and objectives to get funding approval for implementation. Some of the IPs reported that adhering to this regulatory practice has enabled them to implement clear projects and activities that have addressed some of their operational challenges and also helped to improve transparency, accountability and integrity in their operations. A representative of one of the PSIs made the following remarks:

*Our organisation is mandated to ensure that resources are utilised in accordance with established procedures. Anti-corruption efforts, such as managing unearned salaries and adhering to procurement laws, have helped to ensure that funds are spent appropriately, thereby supporting the institution's operational efficiency.*

The above narration demonstrates how conformity with NACAP's regulations, practices and controls was contributing to improve operational efficiency and addressing critical sources of corruption. It was found that the use of validation through the Ghana card (National Identification Card System) and direct supervision from head teachers and sectional heads have contributed immensely to addressing issues related to unearned salaries. This was part of the mechanisms to prevent public sector corruption in the design of NACAP. Some other IPs reported that linking their budgets with their operational goals and objectives has enabled them to track progress of achievement and establish internal monitoring and control systems to achieve their targets. Other IPs also mentioned that aligning their operations to the MTEF has promoted synergies among their programmes and activities to achieve practical targets.

For instance, stakeholders consulted reported that regulatory processes and practices established through NACAP have enhanced the operational efficiency of the Ghana Revenue Authority (GRA) by enhancing convenience in accessing their services. Thus, digitalisation of the service provision of GRA through NACAP has created a more efficient and user-friendly environment for tax compliance, ultimately benefiting both the GRA and the taxpayers.

*Taxpayers can now make payments from the comfort of their homes or offices using mobile money (MoMo) or bank transfers, which eliminates the need to physically visit GRA offices and wait in long queues. By improving the efficiency of revenue collection through digital means, the GRA can better monitor tax compliance and identify discrepancies that may indicate corrupt practices. This efficiency contributes to a more robust tax system that discourages corruption. Digital payments create*

*automatic records of transactions, which enhances transparency and accountability in tax collection. This reduces the chances of errors or disputes regarding payment histories - (representative of a PSI).*

It was reported by some of the IPs that the difficulties that surrounded access to institutional services created avenues for corruption and corrupt practices. However, the actualisation of NACAP's interventions has helped to streamline the operations of some of the implementing partners to eliminate the accessibility difficulties that characterised their services. The evaluation exercise also found that the success of NACAP in improving operational efficiencies in the implementing partners was largely due to the increased transparency, monitoring and accountability mechanisms that were embedded in the digitalisation architecture of the anti-corruption agenda. This implies that more efforts should be made to uphold and sustain these principles in the anti-corruption fight to help realise the overall goal and objectives of NACAP.

### TIMELINESS

One of the strategies implemented by NACAP to obtain expected results was to reduce time for accessing public services by introducing automated systems. The move to automated systems is a strategic approach to create a more robust operational framework among the IPs for combating corruption, fostering a culture of integrity and improving service delivery to the public. The time efficiency has the potential to reduce frustration among stakeholders, which may otherwise lead to corrupt practices as individuals seek to expedite processes through bribery. In this regard, it was reported by several IPs that the automated systems integrated into their operations have increased processing times and drastically reduced backlogs.

A representative of a PSI reported that GRA has reported improvements in the efficiency of processing applications for product registration. With a focus on transparency, integrity and accountability, the representative added that the time taken to process applications has decreased, allowing businesses to get their products to market more quickly. This time efficiency is crucial for businesses that rely on timely approvals to thrive.

As much as the IPs praised the digitisation agenda as the fulcrum for improving transparency, accountability, integrity and convenience in accessing public services, it was reported that poor and high cost of internet connectivity, poor staff and customer adaptation and electronic security concerns have become major factors frustrating the reliable and effective use of the electronic systems. This suggests the need to develop and implement a comprehensive plan or strategy to address these concerns and sustain the gains achieved through digitisation to combat corruption.

### COHERENCE

This criterion of evaluation measured the extent of compatibility of NACAP with the programmes policies and strategies of the implementing stakeholders. The measurement of this criterion is organised under internal and external coherence. Internal coherence assessed the synergies and interlinkages between NACAP and other anti-corruption efforts carried by the implementing institutions as well as the level of complementarity between NACAP and other anti-corruption interventions by the Government. The external coherence measured the level of compatibility or alignment between NACAP and other policies and interventions implemented by international critical actors such as the UNODC. It also considered the level of alignment of NACAP with external anti-corruption policy commitments by the Government of Ghana to the Sustainable Development Goal (SDG) 16.

**EVALUATION QUESTIONS:**

1. To what extent were the objectives, strategies and activities of NACAP compatible with national, regional and international priorities and policies? [SG1]
2. How has the alignment or contradiction of NACAP with other policies facilitated or prevented the implementation and achievement of the objectives of NACAP?
3. What opportunities for collaboration have been utilised during the implementation of NACAP?

**INTERNAL COHERENCE**

It was found from the evaluation exercise that NACAP was very much consistent with the anti-corruption efforts of most of the IPs. For example, a representative of one of the development partners reported that the activities of NACAP align with their goal on awareness creation and community engagement on corruption. One of the principal goals of the development partner is to create awareness about the causes and effects of corruption on the society. The development partner provides advocacy on measures to address public sector corruption to ensure the judicious use of public funds. As a result, the development of NACAP, as an anti-corruption framework, clearly aligned with the operational vision and mission of the development partner. Further, a representative of the National Health Insurance Scheme (NHIS) reported as follows:

*The use of online platforms for subscription and renewal of health insurance service is directly in line with NACAP to create electronic avenues to reduce the human interface that mostly become a breeding ground of corruption. Currently, one can access all our services online, and even make payments and lodge complaints to our offices through the electronic medium. The electronic system has helped to increase transparency and accountability in our operations since all payments are directed to a common pool at the head office. We have also succeeded in eliminating the long queues which were associated with our operations. So, I will say our operational vision is consistent with the principles of NACAP.*

Similar remarks were made by other IPs from the courts, financial institutions and utility service companies regarding the use of electronic platforms to improve transparency, revenue generation and accountability as well as easing congestion and pressure associated with their operations. This shows that the design of NACAP was consistent with the internal challenges of the IPs. The above also suggests that NACAP was very much consistent with the internal programmes and practices of the IPs in addressing issues of corruption. A critical view about the consistencies in the anti-corruption efforts between NACAP and the IPs showed that one of the major opportunities of corruption in Ghana was through human interface in accessing institutional services. As a result, any measure that tries to shift such interactions to remote or electronic platforms helps to reduce acts of corruption by promoting transparency and accountability. This suggests that additional efforts to help reduce the direct human interactions in accessing public and institutional services could help to address issues on corruption. Nonetheless, this will require more education and structures to ensure that the services are very much accessible to persons from different facets of the country.

The internal consistency and coherence of NACAP with the internal programmes of the IPs could be attributed to the integration and alignment of NACAP structures to the institutions such as the appointment of focal persons and internalisation of the audit system. It could also be attributed in part to the extensive engagement of the IPs on the aims and major activities of NACAP, and the awareness creation of the sources and effects of corruption in Ghana.

## EXTERNAL COHERENCE

The operationalisation of NACAP was found to be consistent with the UNODC's convention against corruption, which entreats members to develop an anti-corruption model through preventive policies and enforcement mechanisms that include the establishment of anti-corruption bodies. The strategic objectives and broad activities of NACAP were related to the provisions in the convention on corruption. This suggests that some specific actions from NACAP, such as the establishment of the Office of the Special Prosecutor in 2018, were direct actualisation of the provisions in UNCAC.

In addition, the internalisation of the audit system, as a corruption preventive measure, was consistent with the anti-corruption prevention model of UNCAC. The UNCAC in 2003 entreats member countries to promote transparency and accountability in matters of public finance, and establish specific requirements for the prevention of corruption, in particularly critical areas of the public sector, such as the judiciary and public procurement. This shows that the enactment of the Public Procurement Act, 2003 (Act 663) and subsequent establishment of the Public Procurement Authority coupled with the amendment of the Act in 2016 (Act 914) were all a direct response to the provisions in the UNCAC. The integration of procurement departments in both public and private sectors of the country was also consistent with this requirement from the external partners of the country.

Part of the convention also requires public service institutions to develop a standard code of conduct to regulate their interaction with the public. The aim is to enhance the quality of service from public service institutions devoid of corruption. It was found from the evaluation exercise that the development of service charters by several public and private institutions under NACAP was in consonance with this requirement of UNCAC. The service charters clearly state the service quality expectations of clients and avenues to lodge complaints. Some of the implementing partners reported that the creation of avenues for complaints had been useful in providing important feedback for their continuous improvements in their service operations.

Furthermore, the UNODC's Convention on Corruption in 2003 requires member countries to involve members of the society to help prevent public corruption. The Convention calls on countries to actively promote the involvement of non-governmental and community-based organisations, as well as other elements of civil society, and to raise public awareness of corruption and prevention. NACAP's engagement with broad stakeholders from the public and private sectors, NGOs, and the general public conform with these requirements of important international partners. The extensive public awareness and sensitisation on the sources of corruption by CHRAJ and the National Commission for Civic Education (NCCE) are consistent with the anti-corruption agenda of the international community.

Since Ghana is a signatory to the United Nations SDGs, the evaluation exercise examined the level of coherence between NACAP and SDG 16, which focuses on building effective, accountable and inclusive institutions at all levels. Specifically, targets 5 and 6 seek to substantially reduce corruption and bribery in all forms. The implementation of NACAP and its adaptability across different political regimes is a demonstration of the commitment of Ghana to meeting these international targets by 2030. Representatives of some of the IPs indicated that the passage of the Right to Information Bill to law is particularly targeted at promoting transparency in public service as enshrined in the SDGs. Some representatives of the anti-corruption and law enforcement agencies also mentioned that the decentralisation of the audit and procurement services was consistent with the principles of accountability and transparency, which are core to every anti-corruption agenda.

Ghana's commitment to external development and anti-corruption protocols and instruments has influenced its efforts to implement actions to reduce corruption in the public sector. Thus, all the above showed that

there is coherence between NACAP and external partners and policy commitments of Ghana. This suggests that Ghana is committed to these institutions and protocols and is geared towards meeting its international commitments with respect to anti-corruption.

## EFFECTIVENESS

This evaluation criterion measured the extent to which NACAP has achieved the four strategic objectives of 1) building the capacity of the public to condemn and fight corruption and make its practice a high-risk, low-gain activity; 2) institutionalising efficiency, accountability and transparency in the public, private and not-for profit sectors; 3) engaging individuals, media and CSOs in the report and combat of corruption; and 4) conducting effective investigations and prosecution of corrupt conduct.

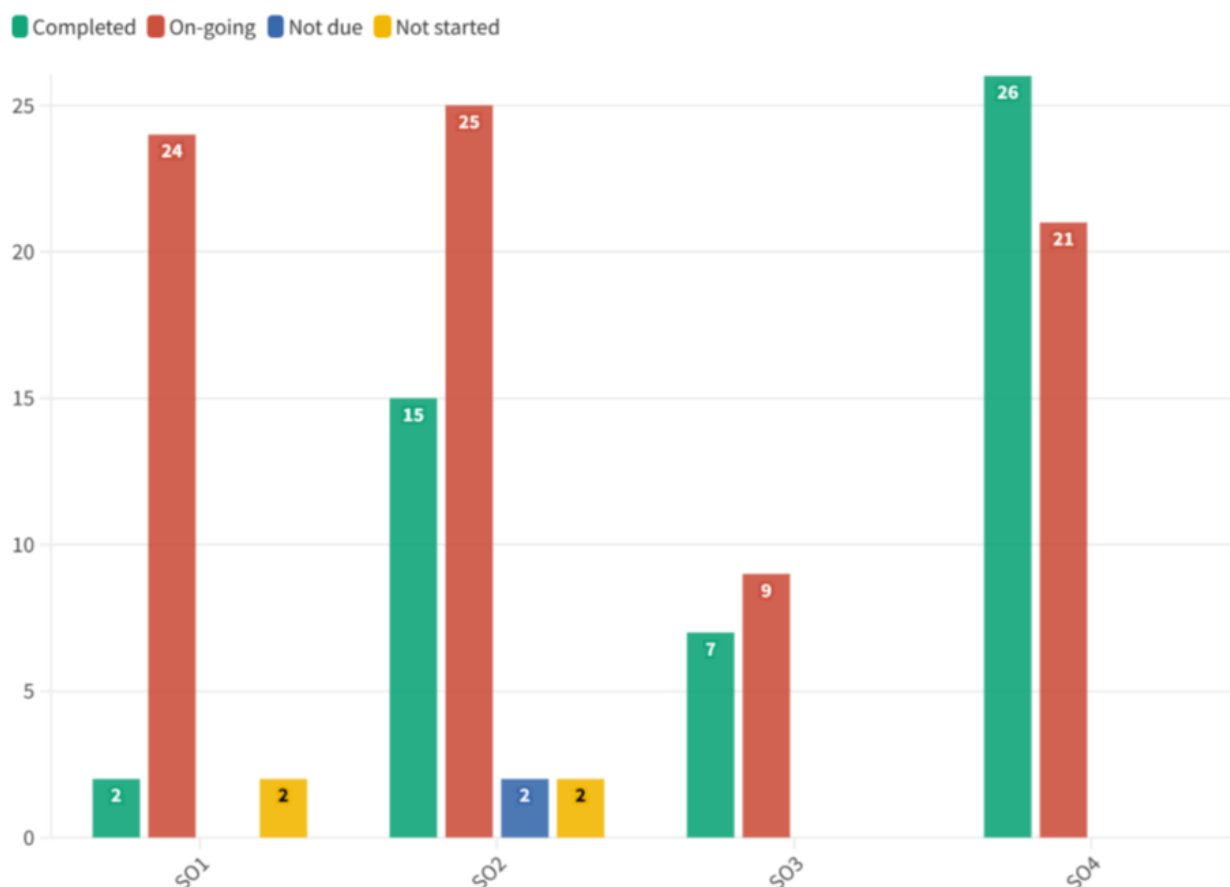
### EVALUATION QUESTIONS:

1. To what extent has NACAP achieved its objectives, outputs and outcomes?
2. What, if any, unintended results can be attributed to NACAP?
3. What are the facilitating or hindering factors for achieving the objectives of NACAP?
4. What strategies or activities have been the most effective in achieving the objectives and outcomes of NACAP?
5. How have the roles and responsibilities of stakeholders contributed to reducing or combating corruption in Ghana?

This section presents the findings on the impact of the NACAP activities over the past 10 years. Based on the mixed-method approach adopted for the study, the section first focuses on the achievements of NACAP based on the review of secondary data and organised under the four strategic objectives of the Plan before corroborating it with the responses from IPs through the interviews. The desk review focused on the secondary information related directly or indirectly to the implementation of NACAP such as Annual Work Plans (AWPs) of IPs, Annual Progress Reports (APRs) of NACAP by CHRAJ and the Corruption Perception Index (CPI) of Transparency International.

## PROGRESS ON THE NACAP ACTIVITIES

Before presenting the findings from the desk review and the interviews, we first present the summary of the progress in achieving the strategic objectives of NACAP (Figure 4). It was revealed that, from its initial stage in 2015 to now, there is demonstrable evidence that the implementation of NACAP has gained tremendous momentum in terms of the number of IPs providing AWPs, the number of activities covered, and the sensitisation and training programmes organised. As reported by CHRAJ in the 2022 APR (the last available report at the time of the evaluation), out of the 135 broad activities of NACAP, 130 (96.3%) of planned activities, made up of 24 short-term, 45 medium-term, and 60 long-term activities, are at various stages of implementation.



**Figure 4: Progress in Achievement of Strategic Objectives of NACAP**

Source: CHRAJ, 2022

\*SO=Strategic Objective

**Strategic Objective 1: Building the capacity of the public to condemn and fight corruption and make its practice a high-risk, low-gain activity**

This strategic objective focused on creating awareness on the evils of corruption, mainstreaming anti-corruption ethics and integrity in the society, and building capacity to report and condemn acts of corruption.

***Awareness creation on the evils of corruption***

From the desk review, it was realised that public awareness campaigns and education on corruption have increased. That is, NACAP has promoted anti-corruption education in schools and the wider community through the NCCE, Ghana Integrity Initiative (GII), Ghana Anti-Corruption Coalition (GACC), Bank of Ghana (BoG), Ministry of Food and Agriculture (MoFA), Ministry of Lands and Natural Resources (MoLNR), Ministry of Youth and Sports (MoYS), Ministry of Fisheries and Aqua-culture Development (MoFAD), Ministry of Communication and Digitisation (MoCD), Office of the Head of Civil Service (OHCS) and related institutions. These have the potential to foster a culture of integrity and accountability among citizens. The renewed awareness created by the NCCE, especially in schools, has the potential to produce the next generation of citizens who are not only informed but also empowered to fight corruption and related practices.

Similarly, from the interviews, it was reported that key implementing agencies such as CHRAJ and NCCE have embarked on education and awareness campaigns to create awareness about issues related to corruption. It was found that the awareness creation programmes were organised through direct interactions with other institutions and communities, workshops and training sessions, public education campaigns, and collation and sharing of reports with other state institutions and CSOs to track their compliance with the tenets of NACAP. Thus, the collation of reports enabled CHRAJ, as the central implementing agency, to ascertain the training, knowledge and capacity gaps for each institution in relation to the implementation of NACAP. For example, a representative of an IP narrated,

*CHRAJ collects and compiles reports from various activities and initiatives related to NACAP. This collation process not only helps in monitoring progress but also facilitates the sharing of insights and findings with regional stakeholders, thereby enhancing collaboration and understanding.*

Figure 5 presents some of the public awareness campaigns rolled out by IPS toward reporting and combating corruption in Ghana.



**Figure 5: Awareness Creation Campaign against Corruption**

Source: Fieldwork, 2024

Another representative of an IP indicated that the feedback system through the collation of performance reports enabled them to provide training and capacity building programmes that were directly responsive to the needs of the various institutions in relation to the implementation of NACAP. Stakeholders involved in the training programmes included government agencies, CSOs, community leaders, and private sector organisations. The evaluation exercise found that some of the IPs had decentralised offices at the regional levels, which helped in facilitating the dissemination of information about anti-corruption strategies.

It was also reported that CHRAJ used community forums and discussions to foster dialogue about corruption and its impact on the society. In order to help create a well-informed public that is aware of the implications of corruption, CHRAJ distributed education materials such as brochures, flyers and reports that provided information on anti-corruption laws, reporting mechanisms, and the role of citizens in combating corruption. Some of the public sector institutions attested to the fact that such education materials became reference materials that helped guide their operations to ensure their compliance to the tenets of NACAP.

From these efforts on awareness creation on the anti-corruption action plan by CHRAJ, the evaluation exercise examined the level of awareness of the various institutions on NACAP. It was found that the institutions at the national and regional levels were very much aware about the details of NACAP. For example, a national representative of a financial sector institution narrated,

*NACAP seeks to reduce public sector corruption and improve institutional integrity. Our knowledge level has evolved over the years due to the appointments of focal persons to engage staff through training programmes on the objectives of NACAP.*

Further, a regional representative of a PSI expressed as follows:

*NACAP provides a structured framework for combating corruption in Ghana. It aims to strengthen institutions, enhance transparency, and promote accountability within government and public services. NACAP seeks to educate the public about their rights and the mechanisms available for reporting corruption, thereby fostering a culture of integrity and civic engagement in the fight against corrupt practices.*

Similar views were expressed by other institutional representatives at the national and regional levels, demonstrating their knowledge and awareness about the detailed operations of NACAP, and the measures adopted by the institutions to actualise the tenets of the Programme in their operations. The awareness level of NACAP at the national and regional levels is imperative to ensure that various institutions adopt specific programmes, strategies and actions to control acts of corruption in their mode of operations. This is due to the fact that these institutions operate a vertical organisational structure, where strategic policy directives emanate from the apex and trickle down to the other levels.

As much as the level of awareness about the details of NACAP were high at the national and regional levels, some of the stakeholders at the sub-regional levels expressed limited knowledge and awareness about the Programme. For example, a district registration officer of a PSI acknowledged that NACAP is aimed at eliminating corruption in the public sector but admitted lacking detailed knowledge on the programme. Further, an internal audit officer at the district level also reported that even though training programmes were organised for various institutions, there were no clear plans and avenues to apply the knowledge by developing actionable plans to guide their operations. A district representative of a PSI also narrated,

*I have read about NACAP and understand it to be an anti-corruption action programme, but I admit that I do not know much about its specific activities or how it operates in detail. I also recognise the involvement of CHRAJ and other agencies in the fight against corruption but I am still in the process of learning more about NACAP.*

Evidence indicates that high-level awareness among the national and regional representatives of the various stakeholders had not fully transcended to the sub-regional levels, potentially affecting NACAP's effectiveness as most of the interactions between the institutions and the general populace, for public services, occur at the sub-regional levels. The study, however, found that the variations in the level of awareness between the regional and sub-regional levels were partly due to poor orientations for newly appointed persons to critical positions at the district levels. In other words, newly appointed leaders in some of the institutions at the sub-



regional levels could not find detailed information on NACAP, which could affect their appreciation, capacity and commitments to implementing specific actions towards achieving the objectives of the Programme.

As a result of the low level of awareness among some of the sub-regional level actors, they were unable to trace some of the laws and government policies to the overall goal of NACAP. For example, some of such actors were unable to link the Whistleblowers' Act, Right to Information Act, Internal Audit Act, establishment of the Office of the Special Prosecutor, and the Procurement Act to NACAP. The low level of awareness could also affect the commitment and dedication of such institutional representatives towards the implementation of the activities of NACAP. For example, a regional representative of the Forestry Commission indicated that there is little action on NACAP because of the low-level awareness among government agencies.

### ***Mainstreaming anti-corruption ethics and integrity in all sectors of the society***

At the core of the strategic objective to build the capacity of stakeholders to condemn and fight corruption is the activity to mainstream anti-corruption ethics and integrity in all sectors of the society.

Some consulted stakeholders indicated that the internalisation of auditing services in the various institutions fostering a culture, where workers are always alert that their activities will be subjected to auditing processes. According to some of the institutional representatives this additional layer of direct supervision in most of the public sector institutions was helping to get most people in line to promote transparency, integrity and accountability in their engagement with the public. Thus, the internal audit function in the public sector management was found to be contributing to identifying and reporting corrupt acts as well as assessing the operational financial, compliance and strategic risks associated with their activities and services. A representative of an anti-corruption and law enforcement agency had this to say:

*The basic functions of our institution is to ensure compliance to the public financial management system, investigating internal and external fraud, identifying data inaccuracies in financial reporting, and assessing risks in public sector institutions are gradually and seemingly creating a certain level of awareness, mindset and norm to comply with set standards and regulations to reduce misapplications and misappropriation of resources.*

It was also found that the scrutiny provided by the Public Accounts Committee of Parliament was instilling some level of discipline in public sector workers. Some of the participants indicated that the publicity given to the activities of the Committee compels them to act within the approved practices and standards. The implication is that the fear of public naming and shaming of persons engaged in acts of corruption is gradually compelling public sector workers to comply with laid down procedures regarding the utilisation of public resources.

Other implementing partners also mentioned the internalisation of procurement services and its practices into the various institutions as another anti-corruption measure to help mainstream certain operational ethics and integrity into various sections of the society. A representative of the Kumbungu District Assembly reported that the Public Procurement Authority has regulations and guidelines that public institutions are bound to conform to. He added that such regulations guide them to avoid breaches with the procurement law by promoting transparency and accountability in public procurement processes. In addition, a representative of the Ghana Education Service (GES) mentioned that the public procurement system has now dealt with the previous conflict of interest that budget and finance officers acted as procurement agents for government institutions. Prior to the implementation of the public procurement law, budget and finance officers were acting as procurement officers in some institutions, which created avenues for prices of budgeted items to be inflated. He added that the GES and other public institutions are now restricted by the

Public Procurement Act, 2003 (Act 663) and its subsequent amendment in 2016 (Act 914) to conform to the laid down regulations to avoid infractions of the law. The above shows that the actualisation of the Public Procurement Act has helped to fashion-out a particular culture in public institutions, where public officials have to streamline their operations in line with procurement rules and ethics.

The evaluation exercise found that issues related to procurement controls have been instituted in the private sector. Some representatives of the Independent Government Institutions indicated that the internalisation of procurement sections in both the public and private sectors has become very useful for the compilation of various taxes, including withholding tax. This shows that the operationalisation of NACAP has contributed to ensure proper estimation of taxes from both public and private sectors.

### ***Building capacity to report and condemn acts of corruption***

It was found from the evaluation exercise that the enactment of the Right to Information Act, 2019 (Act 989) and the amendment of the Whistleblower Act, 2006 (Act 720) in 2023 were part of the strategies of NACAP to help empower the citizenry to report acts of corruption. Thus, a representative of the Ghana Integrity Initiative (GII) had this to say:

*The Whistleblower Act was to give greater protection to citizens who expose acts of public corruption and reward them for their brave acts. It aimed at protecting whistleblowers against acts of victimisation from powerful corrupt officials and institutions. It sought to empower the citizenry to participate in the fight against corruption.*

Similar statements were made by representatives of other implementing partners. Some representatives of CHRAJ and NCCE also mentioned the Right to Information Act, 2019 (Act 989) as another measure to help empower the citizenry to report and condemn acts of corruption. A representative of CHRAJ reported that the citizens require easy access to information to properly scrutinise public records to detect and report acts of corruption. The above shows that the legal protection and access created for the citizenry sought to encourage and empower them to actively participate in the anti-corruption agenda.

Some of the institutional representatives reported that there was extensive sensitisation and awareness creation by CHRAJ and NCCE on the Right to Information Act, 2019 (Act 989) and the Whistleblower Act, 2006 (Act 720). The aim was to ensure that the citizens understand their rights, roles and obligations associated with the passage of such laws. This in a way was to enlighten and empower them to play active roles in the fight against corruption.

However, a representative of a CSO indicated that the delays in assenting to the amended Whistleblower Bill is hindering its effective implementation to encourage citizens to volunteer critical information on acts of corruption. It was found by some representatives of CSOs that one of the major amendments to the Whistleblower Act, 2006 (Act 720) was to expand the sources of money for the whistleblower reward fund.

### **Strategic Objective 2: Institutionalisation of efficiency, accountability and transparency in the public, private and not-for profit sectors**

The second strategic objective of NACAP is to institutionalise efficiency, accountability and transparency in public, private and non-governmental organisations. This objective seeks to conduct regular systems examination to plug corruption loopholes, strengthen internal controls and audits, and develop and

implement customer service charters in all MDAs, among others. From the desk review, the following activities revealed the effectiveness of NACAP:

### ***Legislative reforms***

Several important pieces of legislation have been enacted or strengthened under the NACAP framework, including the Right to Information Act (2019), which enhances transparency in governance, and the Witness Protection Act (2018), which protects whistleblowers and witnesses in corruption cases, Contract Amendment Act (2023), which now specifies the persons authorised to execute contracts and/or transactions on behalf of the Government of Ghana, and the Anti-Money Laundering Act (2020) Act 2044, which seeks to consolidate the laws relating to the prohibition of money laundering. Other NACAP-related legislative reforms include Petroleum Revenue Management (Amendment) Act, 2015 (Act 893), Public Procurement (Amendment) Act, 2016 (Act 914), Public Financial Management Act, 2016 (Act 921), Ghana Deposit Protection Act, 2016 (Act 931), Payment Systems and Services Act, 2019 (Act 987), Companies Act, 2019 (Act 992), Narcotics Commission Act, 2020 (Act 1019), Real Estate Agency Act, 2020 (Act 1047), Security and Intelligence Agencies Act, 2020 (Act 1030), Securities Industry (Amendment) Act, 2021 (Act 1062), and Insurance Act, 2021 (Act 1061). These reforms are critical in strengthening and emboldening the general public to participate in the fight against corruption in the country. In addition, relevant bills have been initiated to fight corruption in Ghana such as the Conduct of Public Officers (CoPO) Bill, which seeks to introduce reforms in the declaration of assets and liabilities, address conflicts of interest, and establish a code of conduct for public officials, and Criminal and Other Offences (Procedure) Amendment Bill, which when passed into law, seeks to amend the Criminal and Other Offences (Procedure) Act 1960 Act (30) to provide for plea bargaining in the administration of criminal justice.

### ***Institutional strengthening***

Within the 10 years of the implementation of NACAP, Ghana has witnessed the strengthening of key anti-corruption institutions such as CHRAJ, EOCO as well as the establishment of the Office of the Special Prosecutor (OSP). The establishment of the OSP, as a specialised independent anti-corruption agency investigates and prosecutes acts of corruption and corruption-related offences, is a major milestone in the fight against corruption in Ghana. These institutions have played a pivotal role in investigating and prosecuting corruption-related cases. Such prosecutions have the potential of sending the right signals to public officers and the general citizenry and may embolden residents to report corrupt practices, knowing that it will end in prosecutions. Also, the Anti-Money Laundering Act (2020) Act 2044, established the Financial Intelligence Centre as a corporate body to fight financial corruption, money laundering, financing of terrorism, etc. In addition, the Office of the Attorney General and Minister of Justice (OAGMJ), EOCO, CHRAJ and others engaged in capacity building for investigators, prosecutors and staff of anti-corruption agencies which is an important aspect of institutional strengthening. Moreover, CHRAJ, in collaboration with Office of the Head of Local Government Service (OHLGS) has built the capacity of NACAP Focal Persons in some MMDAs to coordinate NACAP activities and reporting at the district level. The most recent comprehensive NACAP training workshops were conducted across eight (8) zones in the country in June 2024. This workshop, organised by CHRAJ with support from the German Corporation for International Cooperation (GIZ), brought together 324 participants from 60 MMDAs, including District Coordinating Directors, Hon. Presiding Members, District Directors of NCCE, Heads of Internal Audit Units and NACAP focal persons. Furthermore, the Public Service Integrity Programme (PSIP) has been rolled out, including enforcement of the Code of Conduct for Public Officers, Asset Declaration regime, Conflict of Interest rules and Gift Policy in public sector institutions

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

In the same vein, the interviews with the IPs revealed that several practices and strategies had been adopted by the stakeholders to incorporate anti-corruption measures in their operations. The anti-corruption measures ranged from digitalisation, regular auditing, monitoring and control systems, disciplinary actions, records management systems, code of conduct, electronic clocking system, and procurement systems.

For example, some regulators reported that they have shifted most of their engagements and interactions with clients to digitalised platforms to minimise the physical or human contacts, where people are tempted to engage in acts of corruption. One representative narrated,

*By moving services online, we have reduced the need for face-to-face interactions, which often lead to opportunities for corrupt practices. This shift has helped to limit situations where bribery or other forms of corruption mostly occur during in-person transactions... The online systems came with tracking and monitoring capabilities that enhance transparency. Transactions can be logged and audited more easily, making it harder for corrupt activities to go unnoticed... The digitalization of services has simplified several processes such as applications for licences and renewals. This has improved efficiency in the form of reducing the time and resources required for these transactions, which has diminished the motivations for corrupt behaviour.*

The narrative shows that innovative anti-corruption practices have the additional advantage of creating a more efficient, transparent, and accountable system to improve the operations of the stakeholders. This was because anti-corruption practices are fundamental to the growth and development of every organisation. The implication is that the underlying goal of NACAP is fundamental to the growth and development of the operations of the stakeholders. The National Premix Fuel Secretariat has resorted to Bulk Road Vehicle (BRV) tracking system and premix fuel automation system to promote transparency and accountability in its distribution. The BRV tracking system ensures that premix fuel reaches the landing beaches without any diversion or adulteration.

Some other institutions reported to have implemented attendance records keeping system, electronic clocking system, dispatch control monitoring system, and regular auditing system to help internalise the control of corruption in their engagements. These measures were envisaged to collectively contribute to enhance transparency, accountability and integrity in the operations of the stakeholders. For example, the National Ambulance Service has established a dispatch control unit that manages the authorisation of fuel purchases. This unit is responsible for overseeing the charges and ensuring that funds are used appropriately for their intended purposes, such as buying fuel for the ambulances. The electronic clocking system also served as both the key for workers to gain entrance to the offices and mechanism for tracking attendance. It was, therefore, used as a medium for controlling lateness and absenteeism.

Some implementing partners had also instituted internal disciplinary actions against staff identified to be engaged in acts of corruption. For example, a representative of the Food and Drugs Authority had this to say:

*The frequency and outcomes of disciplinary actions taken against staff for corrupt practices serve as a measure of the effectiveness of the anti-corruption policies. A reduction in disciplinary cases over time indicates improved compliance with anti-corruption standards.*

The narration shows that internal disciplinary mechanisms have been used to institutionalise the principles of accountability and integrity in some public sector operations. This approach could be very effective in addressing issues on corruption if it is operated fairly since the internal control measures serve as direct

supervision to the activities of workers. Hence, any acts of corruption could easily and quickly be detected and acted upon.

It was also found that most of the stakeholders used both internal and external auditors to ensure accountability and transparency in the use of funds and resources. For example, a representative of NADMO reported that the organisation conducts regular audits to verify how relief items and allocated funds are utilised to ensure that they are used judiciously and effectively. It was emphasised that the presence of auditors enhances the organisation's integrity and fosters public trust. In other words, the use of both internal and external auditors has created a framework for monitoring financial activities to help prevent corruption and ensure that resources are used appropriately. Other stakeholders also expressed the use of internal auditors to ensure compliance with laws and regulations, as well as verifying the appropriate use of funds for their intended purposes. The Internal Audit Agency has been established with the role of providing oversight over internal audit activities within public sector institutions, ensuring that audits are conducted in accordance with established standards and practices. It was reported that this oversight responsibility helps to identify potential areas of fraud and irregularities in public administration.

The mainstreaming of the internal audit services to every public sector institution acted as an internal control mechanism that provided direct supervision to the activities of government agencies. The internal audit service was seen by the public sector stakeholders as one of the main strategic pillars promoting the principles of NACAP to ensure that the objectives are effectively achieved. From the evaluation exercise, the risk-based auditing by the internal audit service was acknowledged by some of the stakeholders as a proactive approach to identify risks related to fraud and mismanagement of public funds. The risk-based auditing system has helped the internal audit agency to uncover fraudulent activities and instituted measures to prevent such practices.

As part of the efforts to integrate the principles of NACAP into the operations of the stakeholders, the Office of the Civil Service has established the public service code of conduct to guide treatment of employees and the public in their pursuit of public services. Some of the private and quasi-government institutions had also established customer service charters to promote transparency and integrity in their engagement with customers.

Adherence to the Public Procurement Act, 2003 (Act 663), as amended with Act 914, was also considered by some of the stakeholders as an avenue to mainstream NACAP into their operations. As a result, most of the stakeholders had established the procurement directorate to manage procurement processes to ensure compliance with the law. For example, a representative of the National Ambulance Service had this to say:

*The service has put in place systems to guard against irregularities and corrupt practices in procurement. This includes working closely with the Public Procurement Authority and adopting their templates for contracts. To ensure transparency in procurement, the National Ambulance Service has established tender committees that oversee procurement activities, particularly for consumables needed for ambulance operations. The service also conducts annual performance reviews where we assess our adherence to the Public Financial Management Act and discuss aspects related to corruption and financial management.*

Similar actions were reported by the majority of the stakeholders. These show that NACAP has caused some structural transformation in the anti-corruption agenda through the introduction of policy, legal and institutional frameworks to regulate the internal and external operations of both public and private sector organisations to enhance transparency and accountability.

Other efforts to help institutionalise NACAP's principles into the operations of some of the ministries, departments and agencies included the institutionalisation of an annual anti-corruption week, establishment of ethics and compliance committees, installation of NACAP notice boards, regular staff durbars on code of ethics, gender mainstreaming, and development of service charters. It was expected that regular engagement of workers on issues related to NACAP will enable them to adhere to its principles and incorporate them in their daily job delivery. A representative of the Ministry of Roads and Highways narrated as follows:

*A service charter has been developed to inform clients about services provided by the sector, outlining service standards, client rights, and responsibilities. An ethics and compliance committee has been established to oversee all NACAP-related activities.*

Thus, some of the stakeholders sought to build the capacities of both their employees and clients to demand accountability from their services and operations. The inclusion of clients in the service charter was also imperative to help educate the public and involve them in the anti-corruption agenda. Further, the establishment of ethics and compliance committees in some of the implementing institutions is an attestation to the fact that NACAP has caused some structural transformation to the fight against corruption.

It was again reported that the education sector has created school management committees at the community level to provide direct supervision to the activities of teachers and head teachers. A representative of one of the education regulators mentioned that the school management committees are tasked with monitoring the usage of funds at the school level, ensuring that expenditures align with approved budgets and that resources are used for the benefit of students. In other words, head teachers have been made to account to these committees to promote transparency and accountability in educational expenses.

### **Strategic Objective 3: Engaging individuals, media and CSOs in the reporting and combating of corruption**

The third strategic objective of NACAP was to engage the public and members of some of the critical sectors of the society such as the media, and CSOs in the fight against corruption. Through the desk review, it came out that the implementation of the NACAP in Ghana, CHRAJ has worked closely with the media and CSOs to enhance transparency, raise awareness, and engage the public in the fight against corruption. These collaborations have been key to the success of NACAP's goals. Below are some of the key ways through which NACAP has promoted collaboration with the media and CSOs in the fight against corruption in Ghana:

#### ***Corruption in Ghana survey***

In 2021, CHRAJ in partnership with GSS and with technical and some financial support from the UNODC carried out the first ever comprehensive, nationally representative population survey on corruption in Ghana involving 15000 respondents. The main objective was to collect evidence-based information on forms of corruption affecting Ghanaians. It was also to inform policy direction in the fight against corruption. The Report was released in July 2022 and was widely publicised.

#### ***Awareness and education campaigns***

The media has played a crucial role in disseminating information about the dangers of corruption, government policies, and public engagement. NACAP has used various platforms, including radio, television, and social media, to educate the public on corruption-related issues. Investigative journalism has also been encouraged to expose corruption cases. Also, CSOs have been instrumental in organising community outreach

programmes and public forums to educate citizens on their rights and the mechanisms available to report corruption. They work in partnership with media houses to promote anti-corruption messages and campaigns.

### ***Reporting mechanisms and whistleblowing***

Journalists have been empowered to investigate and report on corruption. Through partnerships with CHRAJ through the NACAP implementation, media houses have created platforms for whistleblowers to report corruption anonymously. Media platforms also serve as avenues for public engagement, where citizens can voice their concerns about corruption. In addition, many CSOs have developed independent reporting mechanisms for corruption. They have collaborated with state agencies like CHRAJ to ensure that reported cases are acted upon.

### ***Monitoring and advocacy***

The media has been involved in monitoring the implementation of NACAP and other anti-corruption strategies. Journalists investigate and publish reports on how well the government and its agencies are following through on their anti-corruption promises. CSOs such as GII, Ghana Anti-Corruption Coalition (GACC) and the Centre for Democratic Development (CDD-Ghana) have worked as watchdogs to track progress on NACAP's implementation. They have produced reports on the status of corruption in various sectors and lobbied for more effective laws and reforms. These partnerships have strengthened oversight and pressured the government to act on corruption issues.

### ***Capacity building***

CHRAJ, through partnerships with CSOs and international organisations, has provided training for journalists on investigative reporting, ethics, and legal frameworks. This has equipped journalists with the skills to uncover corruption while ensuring their safety. Similarly, CHRAJ has also collaborated with CSOs to build their capacity to engage in anti-corruption work. This includes training in areas such as research, data collection, and advocacy.

### ***Public engagement and social accountability***

Through talk shows, interviews, and investigative programmes, the media has provided a platform for citizens to debate anti-corruption strategies and hold public officials accountable. Moreover, CSOs have mobilised citizens to demand accountability from government officials. They have conducted social audits and encouraged citizens to report and resist corrupt practices.

The findings from the interviews with the IPs corroborated that of the desk review in many respects. That is, with respect to the third objective, both CHRAJ and NCCE cited regular training and sensitisation of media institutions and the public, the promulgation of the Right to Information and Whistleblower Acts, and Internal Audit Agency Act as well as the constitution of the Public Accounts Committee of Parliament as measures adopted to enable institutions and persons from various facets of the public to identify and report acts of corruption. Thus, the measures sought to create awareness among the populace, media institutions and civil society groups about their roles and responsibilities as key stakeholders in the anti-corruption agenda, and protect them against corrupt officers and institutions.

A representative of NCCE indicated that the awareness creation through regular sensitization of the public aims to equip them with the knowledge to identify corrupt acts and empower them to report such acts to the appropriate institutions. A representative of CHRAJ also reported, 'the Whistleblower Act came into being to allay the fears of whistleblowers from victimisation'. However, a representative of the GII narrated that whistleblowers are not properly protected by state institutions as was envisaged in the promulgation of the law. The representative added that there are no clear established funds to reward whistleblowers, which makes it less attractive for people to report cases of corruption in the country. The poor protection for whistleblowers and the lack of dedicated funds to reward them could frustrate the effective implementation of the Act.

Some representatives of CHRAJ and NCCE indicated that their institutions regularly engage particular sectors and the public on critical laws such as the Right to Information and Whistleblower laws empower them to participate in the anti-corruption fight. Furthermore, some representatives of CHRAJ reported that the Organisation provides some legal support and protection to these media organisations, individuals and CSOs in their quest to uncover corrupt acts in the public sector.

### **Strategic Objective 4: Conducting effective investigations and prosecution of corrupt conduct**

Under this strategic objective, NACAP sought to strengthen the legal and institutional framework for fighting corruption, resource and equip anti-corruption agencies and accountability institutions, establishing independent prosecution authority to assist with the prosecution of corruption cases. It was found from the evaluation exercise that clear and specific mandates have been given to different anti-corruption agencies to prosecute different forms of corruption. The aim is to help facilitate the investigations and prosecution of corruption related cases to deter people from engaging in acts of corruption. As a result, some specific parts of the investigative and prosecution powers and functions of the Attorney General's Department have been ceded to other particular institutions of state with clear legislative support.

Both the desk review and the interviews revealed that there have been several high-profile prosecutions and investigations of corruption cases, particularly with the establishment of the OSP which has taken on significant cases involving public officials. The OSP is mandated to investigate and prosecute acts of corruption and corruption-related offences committed by public officials, politically exposed persons, private persons and legal entities such as companies, corporations, organisations and associations. Thus, investigations and prosecution of corruption cases related to financial or economic losses to the Republic, money laundering, and tax fraud among others have been ceded to EOCO. Further, the OSP was established in 2017 to investigate and prosecute of cases of alleged or suspected corruption and corruption related offences under the Public Procurement Act, 2003 (Act 663), alleged and corruption related offences under the Criminal and Other Offences Act, 1960 (Act 29) involving public officers, and politically exposed persons and persons in the private sector involved in the commission of the offence, among others. The OSP is also responsible to act on referrals of investigations of alleged corruption and corruption related offences by Parliament, the Auditor-General's Office, the Commission on Human Rights and Administrative Justice, the Economic and Organised Crime Office and any other public body.

A representative of one of the Regional Coordinating Councils (RCC) narrated as follows:

*NACAP has consolidated the anti-corruption fight by focusing on strengthening institutions responsible for enforcing anti-corruption laws and policies, enhancing their capacity to detect and address corrupt practices. Overall, NACAP serves as a comprehensive framework to guide Ghana's efforts in reducing corruption and promoting good governance. The RCC collaborates with various*



*agencies, such as EOCO and the National Investigative Bureau (NIB) to investigate corruption-related activities. This partnership enhances the RCC's capacity to address corruption effectively.*

The narration shows that NACAP has created an institutional framework defining clearly the roles and responsibilities of each anti-corruption agency. This was necessary due to the creation of other corruption investigative agencies. In other words, NACAP has created additional institutional structures such as the OSP to investigate specific branches of corruption with prosecution powers. The well-defined roles and responsibilities among the anti-corruption agencies is now helping to promote collaboration with other state institutions to effectively combat corruption. The ceding of some of the investigative and prosecution powers of the Attorney General to other anti-corruption agencies is imperative to reducing the caseload at the Attorney General's Department and delays in prosecuting corruption related cases.

A representative of one of the institutions indicated that the creation of the OSP has added another critical layer to the anti-corruption fight by directly focusing on corruption related cases emanating from the auditing system and findings from the Public Accounts Committee of Parliament. This was imperative to help facilitate the investigation and prosecution of such cases to aid the swift recovery of funds from acts of corruption. According to some of the representatives of the Internal Audit Agency, this targeted anti-corruption agency was a major missing link in the anti-corruption architecture of Ghana. The new anti-corruption architecture of Ghana facilitated by NACAP has, therefore, succeeded in fixing this lacuna by creating agencies specifically responsible for investigating and prosecuting particular types and sources of corruption.

On the issue of resourcing and equipping the anti-corruption agencies and accountability institutions, some representatives of CHRAJ indicated that critical logistics and personnel have been provided to OSP, CHRAJ, Public Procurement Authority, Internal Audit Agency and EOCO over the years to aid the execution of their core mandate. However, some representatives of the Internal Audit Agency reported that the agency lacks logistics at the sub-regional level.

A representative of the PSI also mentioned that the judicial system has benefited immensely from the e-transform project, which included the implementation of the e-judicial service to facilitate the swift prosecution of corruption cases. This initiative resourced the judicial service with essential tools such as computers, facilitated online court activities, and digitised documents within the judicial system. The e-transform project aligned with NACAP by enhancing transparency in judicial service delivery.

## IMPACT

Measuring the impacts of corruption is quite tricky and complex because the farther away from the outputs of the intervention, the harder to gather evidence or collect data to support the claim of impact or otherwise. Some of the impacts may also take many years of sustained activities to manifest. This section presents the findings on the impact of the NACAP activities over the past 10 years. Since several activities and interventions had been running concurrently in the country towards the fight against corruption, the impact of NACAP in this evaluation is framed around *contributions* rather than *attributions*. Therefore, we focus on the *contributions* of NACAP to the overall fight against corruption rather than *attributing* the changes to NACAP and its related activities. In other words, an improvement in the fight against corruption cannot be entirely attributed to NACAP neither can a deterioration in the fight against NACAP be regarded as a failure of NACAP. So, we first present the impacts as reported by the IP during the interviews and then present our observations during this evaluation and from the desk review.

**EVALUATION QUESTIONS:**

1. How has NACAP led to relevant social changes?
2. To what extent has NACAP generated significant positive or negative, intended or unintended, higher-level effects/impacts?
3. How has NACAP impacted the perceptions, experiences, beliefs, attitudes and practices of corruption in Ghana?

**FINDINGS FROM THE INTERVIEWS**

This section presents the findings on the impact of the NACAP activities based on the evaluation criteria. It was organised into significance, differential impact, unintended effects, and transformational change.

**Significance**

This index measured the extent to which NACAP’s programmes and activities mattered to the direct operations and priorities of the IPs. It was found from the evaluation exercise that NACAP has made a strong positive impact on the anti-corruption agencies in the country. For example, a representative of CHRAJ mentioned that NACAP has provided the needed political commitment, will and support and policy direction to enable them expand their public education and sensitisation agenda on anti-corruption. It was also reported by some representatives of the IPs that NACAP provided the needed institutional framework for the various anti-corruption agencies to collaborate in the fight against corruption. This is what a representative of CHRAJ said:

*NACAP has encouraged CHRAJ to work more closely with other institutions, such as the NCCE, to coordinate efforts in public education and awareness campaigns about corruption. We work together to provide resources and speakers for public education initiatives, ensuring a unified approach to raising awareness about corruption.*

The above extract illustrates clear collaborative efforts among the various IPs in educating the public against the sources and effects of corruption on the society. This was made possible through the institutional framework established by NACAP. This collaborative effort was deemed very imperative because some of the IPs reported that they sometimes lack the resources and logistics to effectively conduct mass scale public sensitisation and education on corruption. NACAP, therefore, provided an important missing link in the entire anti-corruption framework of Ghana. This suggests that effective anti-corruption interventions require a comprehensive institutional framework to leverage on the strengths of each agency to achieve the ultimate goal. In other words, anti-corruption efforts cannot be effectively implemented in silos, where each agency seeks to achieve its own objectives.

It was also mentioned that some of the IPs leveraged the collective strengths and collaborative efforts with other agencies to address their resource constraints in the fight against corruption. Thus, inadequate financial resources and logistics were reported by some of the anti-corruption agencies as the main hindrance to their goals of expanding their scope of engagement and sustaining their anti-corruption efforts. This was illustrated by the following quotation from a representative of CHRAJ:

*Despite the commitment to public education, CHRAJ faces challenges such as financial constraints, which limit the frequency and scope of our outreach. We have adapted by utilising available resources, such as conducting informal discussions during community gatherings and collaborating with other agencies to implement some of our activities.*

From the above excerpt, it was obvious that the implementation of NACAP has contributed to addressing one of the basic problems bedevilling the anti-corruption agenda in Ghana. Thus, the institutional framework established by NACAP has fostered collaboration among the anti-corruption agencies to leverage on their resources to achieve a collective aim.

### **Differential Impact**

This section of the evaluation report measured the impact of NACAP across different sectors of the economy. The focus was to ascertain the extent to which NACAP had contributed to fighting corruption in both the private and public sector institutions. The impact of NACAP on the public sector was evident on the various institutional, legal and regulatory frameworks established to guide and control public sector operations and engagements. Thus, a number of legislations and administrative bodies have been created or strengthened through NACAP to regulate public services. Key among them were the Right to Information Law, Public Procurement Act, Public Procurement Authority, Internal Audit Agency, Office of the Special Prosecutor, and Economic and Organised Crime Office. It was reported by several public sector IPs that the various regulations and controls established through NACAP have promoted transparency, accountability, integrity and service quality in their operations. For example, a representative of the Ministry of Local Government and Rural Development (MLGRD) reported as follows:

*NACAP has led to some successes in maintaining order within the organisation, particularly through internal restructuring and the reassignment of officers involved in financial mismanagement. This has made a positive impact on accountability and transparency.*

The above narration demonstrates how NACAP has caused critical changes to the operations of the public sector. It shows that the various institutional and regulatory systems succeeded in causing some changes that reflect the ideals and principles of the anti-corruption agenda. It was also reported that NACAP has led to maintaining order in the public sector, particularly through internal restructuring and reassignment of officers involved in financial mismanagement.

With the private sector, it was reported that NACAP has enabled them to be more transparent and accountable with their revenues and tax obligations. Thus, they were educated on the need to accurately report their revenue levels, properly estimate and pay their taxes as well as paying their taxes on time to avoid penalties. It was also reported that NACAP has created strong public sector institutions with the capacity to detect and act swiftly on intelligence. For example, a representative of one of the private sector companies indicated that FDA now has a robust system to detect unregistered products on the market and either seize them from the market and warehouse or close down the operations of the company. It was again found that the GRA now has a monitoring system to detect discrepancies and variations in tax obligations of companies, which has serious implications on the operations of businesses. All these imply that an improved capacity of the public sector has the potential to compel the private sector to conform to laid down procedures, structures and systems to reduce corruption.

### **Unintended Effects**

One of the unintended effects of NACAP has been the building of strong public sector institutions. Even though the overall aim of NACAP is to fight corruption, it was found that the various legal, institutional and regulatory frameworks have contributed in building strong public sector institutions to regulate and monitor the private sector. This is a positive pre-requisite for effective anti-corruption agenda.

### **Transformational Change**

This index for measuring impact evaluation explored the holistic and enduring changes in systems or norms resulting from the implementation of NACAP. From the evaluation exercise, it was found that NACAP has created a new norm to guide the operations of the public sector and its engagement with private sector stakeholders. It was reported that procurements in the public sector have to be subjected to the procurement regulations and guidelines to avoid any infractions with the legal framework. As a result, some of the public sector IPs indicated that sole sourcing procurements have to be clearly justified with approval from the Public Procurement Authority.

The creation of the service charters as requested by NACAP was also viewed by the IPs as a new system of engagement with the public. Thus, the IPs considered the service charters as a new engagement contract with their stakeholders, which demands that they also have to honour their obligations in the contract. Now, they interpreted the service charters as a contractual arrangement with stakeholders which they could sue and be sued on any aberrations to the tenets of the service charters. One of the representatives of the GRA mentioned that they now feel more committed and obligated to increase their service performance to meet the standards in the service charters. This was deemed necessary to enable the institutions to demand the same level of accountability from their stakeholders.

It was also found that collaboration among the anti-corruption agencies has now become a norm. It was reported that NACAP has made it easy for the various anti-corruption agencies to collaborate for a common cause. Some of the IPs indicated that it has become a norm for them to include other bodies and agencies in their programme planning in their operations.

### **FINDINGS FROM THE DESK REVIEW AND GENERAL OBSERVATIONS DURING THE INTERVIEWS**

This section presents the impact of NACAP based on the desk review and the general observations during the data collection exercise. Although the interviews revealed some positive impacts of NACAP, this section shows that much of the impact of NACAP is yet to manifest in other areas as espoused in the documents and related activities.

#### **Fear of Discussing Corruption**

In the course of the interviews for the evaluation, some representatives of IPs, particularly in the public service, refused to be recorded due to fear of being victimised. Although informed consent and voluntary participation were critical ethical issues duly adhered to in this evaluation, it was expected that participants will be empowered to speak freely on issues of corruption. Their unwillingness to speak on record demonstrates that NACAP has not been able to adequately empower citizens and public officials to report or discuss issues on corruption, which shows that one of the key outcomes of NACAP (on empowerment of citizens) is yet to manifest.

Secondly, in the beginning of the data collection, most of the IPs refused to grant interviews until they received official letters from their bosses at the national level, which also reveals lack of empowerment to discuss issues of national interest such as corruption. As soon as the said letter was written, almost all such IPs granted the interviews but it was realised that the representatives held back some useful information for fear of being linked to it. This persisted despite the assurances from the research assistants that the information provided

will be treated with utmost confidentiality and that their names or that of their organisations will not be mentioned in the report.

### **Lack of a Theory of Change and Baseline Study in NACAP**

The evaluation revealed that NACAP was not designed to allow measurement of impact on reducing corruption because there was no Theory of Change (ToC). That is, NACAP strategies and activities were not developed on the basis of empirical evidence, clear theories, or even explicit assumptions about how to create change. The absence of a ToC and baseline study made it difficult to ascertain the impact of NACAP. Although the various elements of a ToC needed for the realisation of the goals of NACAP could be gleaned from the document, they were not well connected to reveal the pathways through which the expected change will occur. Generally, a ToC articulates how and why an intervention is expected to lead to a specific change, providing contextual analysis, assumptions and risks. An important first step is to make explicit the underlying assumptions about how strategies and programmes in NACAP 2 can lead to the desired results, then test these assumptions using ToC analysis.

Moreover, the absence of a baseline study, coupled with the absence of a ToC, makes attribution difficult and calls into question the evaluability of NACAP. This is particularly challenging when it is difficult to reconstruct the baseline using existing literature.

### **Institutional and Legislative Reforms**

It has generally been argued that there is no quick fix in fighting corruption, and that anti-corruption initiatives targeting long-term outcomes should focus more on institutional building and governance reforms (ITAD, 2011). Therefore, the various institutional and legislative reforms witnessed during the implementation of NACAP are important steps towards the fight against corruption. However, while these reforms are relevant, it is important for NACAP 2 to clearly define the pathways through which these reforms will translate into behaviour change because as Hollard et al. (2009: 9) aptly reported:

*Many interventions involve a leap of faith that assumes that by building awareness of rights among right holders, or by strengthening the capacity for responsiveness amongst duty-bearers, there will be an automatic change of behaviour and power relations that will lead the project seamlessly into an improved set of outcomes.*

These can only be realised when there is a good ToC that demonstrates the pathways to the expected change.

### **Use of the Corruption Perception Index of Transparency International as a Proxy for Impact**

One of the core activities of NACAP is to conduct and publish yearly studies on the state of corruption in Ghana but CHRAJ, GSS and partners conducted and published Public Experiences of Corruption in Ghana in 2022, which does not provide enough data points for assessing the impact of NACAP. Other institutions such as Transparency International have consistently published corruption perceptions across 180 countries for more than two decades. The Corruption Perceptions Index (CPI) is an index that scores and ranks countries by the perceived levels of corruption in their public sector. It is published annually by Transparency International, an International NGO. It conceptualises corruption as an “abuse of entrusted power for private gain”<sup>4</sup>. It has a

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<sup>4</sup> Transparency International (<https://www.transparency.org/en/what-is-corruption>)

minimum score of 0 (highly corrupt country) and a maximum score of 100 (corruption-free country) and uses this score to rank 180 countries from 1 to 180.

Although there are criticisms of the use of perception studies in anti-corruption evaluation, we believe that using the CPI of Transparency International is appropriate and useful in this evaluation, especially in the absence of a baseline study and a ToC. In other words, a change in public perceptions about corruption and corruption-related activities over time is a critical reflection of the high-level effects (impact) of the initiative.

We use Ghana's performance in this CPI to gauge the impact of NACAP over 10 years before and 10 years after the introduction of NACAP. In this evaluation, we use the CPI score instead of the CPI ranking because the ranking depends on the number of countries per year. Generally, the highest score (47) was recorded in 2015 when NACAP came into operation. However, there has been a relative decrease in the score for Ghana within 10 years of the implementation of NACAP, declining steadily to 40 in 2017 and rising gradually thereafter to 43 in 2020, and tapering off since then. Although the score is a subjective measure of corruption in Ghana, it shows that Ghana performed relatively better (average of 42.7) during the 9 years of the implementation of NACAP (2015-2023) compared with 10 years (2005-2014) before NACAP (average of 35.1). It is important to note that this is not in any establishment of causality but an association between NACAP implementation and Ghana's performance in the Corruption Perception Index.

## SUSTAINABILITY

In this evaluation, the issue of the sustainability of NACAP activities and its achievement was measured using (1) the challenges that threaten the sustainability of NACAP and (2) systems that can sustain the gains of NACAP. Accordingly, the findings are organised under these two main issues as follows:

### EVALUATION QUESTIONS:

1. To what extent has stakeholder ownership and buy-in been achieved in local, national and regional settings?
2. How will the key results and outcomes/changes achieved by NACAP continue after its implementation?
3. What mechanisms or structures have been put in place to sustain the key outputs and outcomes of NACAP, and how likely will the mechanisms and structures continue to function after NACAP?

## CHALLENGES THAT THREATEN THE SUSTAINABILITY OF NACAP

NACAP has made significant strides in raising awareness, promoting transparency and strengthening institutions in the fight against corruption in Ghana. However, significant challenges exist. Addressing these will be crucial for achieving NACAP's long-term goals and ensuring the sustainability of NACAP activities and its achievements. The main challenges are discussed in the sub-sections below:

**Inadequate financial resource allocation:** Despite the ambitious goals of NACAP, many of the implementing institutions face significant funding and resource constraints. Apparently, this is the result of a lack of understanding about the role of IPs in the implementation of NACAP, as they were expecting funds from the central government or other external sources. Subsequently, most IPs did not budget for NACAP activities nor did they assign personnel to coordinate NACAP activities, although the Guidelines on Preparing Budgets from the Ministry of Finance directs all covered institutions to include anti-corruption measures in their budgets and integrate them into their programmes and operations in their budget estimates in line with NACAP. This limited their capacity to create awareness, carry out investigations, prosecute cases, and implement

preventive measures effectively. In fact, financial challenge was considered the most serious constraint in the implementation of NACAP activities. For example, a representative of one of the IPs reported that the lack of financial support critically hindered the effective implementation of NACAP strategies and activities. Similar complaints were issued by other institutional representatives. One of them had this to say, *“Funding for activities aimed at raising awareness, such as printing flyers or travelling to communities for sensitisation, often comes from our own pockets”*.

This indicates a lack of institutional support or budget allocation for awareness campaigns, which can limit the capacities of the implementing institutions to effectively disseminate information about the anti-corruption agenda. The lack of budgetary support for the implementation of NACAP activities could diminish the commitment and seriousness the implementing institutions attach to the fight against corruption. Thus, financial constraints undermine the effectiveness, reach, and sustainability of anti-corruption initiatives, making it harder to prevent and combat corruption in both the public and private sectors. Generally, inadequate funding affects anti-corruption activities through the following pathways: a) inadequate resources for enforcement and investigations, b) inadequate training and capacity building, c) ineffective monitoring and reporting mechanisms, and d) reduced public awareness and engagement. All these have serious implications for the fight against corruption and corruption-related offences in Ghana.

**Inadequate sensitisation and awareness creation:** It was revealed that initial sensitisation on NACAP generally focused on the national and the regional level institutions without much effort towards the sub-national institutions which are actually on the ground and are spread across the country. In addition, there was very limited awareness creation among the general population who are required to be empowered to demand accountability and report corruption or corruption-related practices. Per the NACAP document, IPs were supposed to create awareness within their areas of jurisdiction, but the annual reports revealed that very few IPs reported on the activities towards awareness creation. In fact, in 2022 (the most recent Annual Progress Report), only 15 IPs reported on awareness creation of NACAP activities.

Some of the institutions complained of not receiving any training after the initial session which occurred some years back. Many of such institutions requested for the need for more in-depth training to effectively implement NACAP strategies and activities. Some of the institutional representatives complained of lacking in-depth knowledge about the activities of NACAP and their expected roles. It must be noted that the level of knowledge of the stakeholders was critical to the effective implementation of NACAP. As such, the complaints of limited training and low level of knowledge could critically hinder the effective implementation of anti-corruption activities. It could also affect the engagements of such institutions with other stakeholders on the anti-corruption agenda. Without adequate education and training on how to identify corrupt practices, where and when to report corrupt practices and the assurance of safety in reporting corruption, the objectives of NACAP will never be achieved.

**Training of Focal Persons was not timely and did not cover all IPs:** Timely and effective training of focal persons is crucial for the success of anti-corruption initiatives. Even though appointment of Focal Persons is an integral part of the implementation of NACAP, they needed to be trained and retrained on NACAP activities and reporting mechanisms. However, the desk review revealed that there were delays in appointment and training of Focal Persons across the various IPs. In addition, the training was limited in scope in terms of the number of IPs covered. Delays in training can undermine the fight against corruption by reducing efficiency, weakening accountability, and eroding public trust, inefficient resource mobilisation and allocation for NACAP activities, and weak implementation of NACAP activities in the respective IPs.

**Inadequate cooperation from IPs:** Generally, there has been inadequate cooperation from the IPs over the years. One evidence is the low level of reporting reflected in the number of IPs that reported on their

respective activities over the years and as consistently evident in the NACAP Annual Reports presented by CHRAJ. A second dimension of low cooperation is the late submission of reports on AWP by IPs. This inadequate cooperation has been well documented in almost all the Annual Progress Reports of CHRAJ (2015-2022). More specifically, the 2021 Report notes that *“In terms of reporting, there was low patronage and reporting on implementation of NACAP by key stakeholders due largely to a lack of understanding of the NACAP and the reporting template by newly assigned NACAP focal persons”*. This low level of cooperation stems from the fact that reporting was largely voluntary among IPs and that CHRAJ cannot officially compel IPs to report on NACAP. That is, it was not tied to key performance indicators of the IPs and that they were not obliged to commit funds and other resources to the implementation of NACAP activities in the organisations.

**Transfers of Focal Persons:** One of the major challenges in the implementation of NACAP has been the frequent transfer of NACAP Focal Persons which has the potential to significantly hamper the progress and effectiveness of anti-corruption initiatives, making it difficult to achieve sustained results. Some of the of impact of the frequent transfers of Focal Persons are discussed below:

1. **Loss of institutional knowledge:** Focal Persons often have specialised knowledge and experience that they accumulate over time through education and training. Frequent transfers disrupt this knowledge continuity, leading to inefficiency and a lack of consistency in implementing anti-corruption strategies.
2. **Weakened relationships and trust:** Anti-corruption efforts often rely on building relationships with stakeholders, such as law enforcement agencies, civil society organisations, traditional authorities, local authorities and international bodies. Frequent transfers can weaken these relationships and reduce trust in the process, as new focal persons may take time to establish these connections.
3. **Delayed implementation of programmes:** Anti-corruption programmes often require long-term commitment and follow-through. When focal persons are frequently transferred, it can result in delays or disruption in the implementation of ongoing programs, reducing their effectiveness.
4. **Fragmented approaches:** Different focal persons may have different approaches or priorities. Frequent changes can result in a fragmented approach to combating corruption, where strategies are not cohesive and efforts become disjointed.

**Ambitious objectives and activities:** The evaluation revealed that NACAP is overly ambitious due to its broad scope, the limited capacity of implementing institutions, cultural barriers, weak capacity for monitoring, and concerns over funding sustainability.

1. **Scope and complexity:** The plan covers a wide range of sectors, from government institutions and law enforcement to civil society and private entities. Its comprehensive nature requires extensive coordination across many agencies, which has proven to be a challenge. The broad scope makes implementation difficult, as it requires systemic changes across various levels of governance.
2. **Institutional capacity:** Many of the institutions responsible for implementing NACAP lack the necessary resources, expertise, and capacity to enforce anti-corruption measures effectively. This includes both financial and human resources, which limits the Plan's impact. The assumption that all institutions would have the capacity to implement the plan is seen as overly optimistic. This limited capacity was realised and efforts were made to build the capacity of IPs. However, due to inadequate financial resources, most of the intended capacity-building initiatives could not be implemented and/or sustained.
3. **Cultural and social challenges:** Corruption in Ghana is not just a systemic issue but also a social and cultural problem. The deep-rooted nature of corruption in daily life, combined with societal tolerance for some forms of corruption, makes it difficult to implement the sweeping changes outlined in NACAP. For example, there are general perceptions that people in government or public offices should support family members and friends to get jobs or opportunities, leading to high levels of



nepotism and cronyism. These tend to embolden beneficiaries of corrupt practices to feel that they are not guilty of the act. This reflects the tacit consent of the general populace about some corrupt practices as long as such practices bring benefits to individuals, families or communities. Changing these societal attitudes is a long-term process that cannot be achieved within the Plan's timeframe.

**Low political action:** Political leadership and a commitment to fighting corruption are essential for sustaining anti-corruption reforms in a country. Thus, the effective implementation of NACAP for its intended benefits and impact requires strong political will, commitment, support and action. This helps to create strong institutions and laws that promote accountability and establish trust and integrity within Ghana's society.

The evaluation of NACAP revealed that there was generally assured political will, commitment and support for the NACAP implementation. Evidence showed some political will, support and action through the legal and institutional reforms, as well as strong HiLIC support for the NACAP process and development. However, political action in terms of committing funds and other resources for NACAP implementation was relatively low. This assertion was based on three factors:

1. **Funding for NACAP activities:** Funding NACAP activities is crucial for promoting transparency and accountability in institutions and among the citizenry. The final NACAP evaluation found that there was a budget allocation for the planned activities of NACAP. However, the evaluation team received several complaints about the unavailability of funds to implement NACAP activities (e.g., training and sensitisation programmes) at the institutional and national levels. The government should provide adequate resources, including funding and professional staffing, for the effective implementation of NACAP II. This will enhance the integrity of institutions and foster trust among citizens. This could be done by establishing institutional and national budgets for NACAP activities, which should be backed by timely funding releases.
2. **Political arrangements:** Considering the overlapping functional responsibilities of some institutions (e.g., the Judicial Service, the Ghana Police Service, OSP and EOCO), a critical analysis should be conducted in assigning lead and supporting responsibilities under the NACAP activity implementation and funding. Attention should be paid to the interconnectedness and interdependencies among public institutions with overlapping functional responsibilities in implementing NACAP activities, professional staffing and handling the finances related to NACAP activities. It is recommended that NACAP II considers defining national roles and funding, and compartmentalised roles and funding of activities to ensure proper alignment. The alignment of national institutions regarding the implementation and funding of NACAP activities is a prerequisite for effective action plan implementation and its funding.
3. **Political accountability:** It is important to establish systems of monitoring and evaluating NACAP activities for greater transparency, integrity and accountability among the Ghanaian society. Such systems allow for adjustments and improvement over the implementation period of NACAP, ensuring its sustainable impact. In implementing NACAP, there was no mid-term evaluation conducted although the NACAP document outlined it as one of its key activities. The inability of the coordinating agency to conduct a mid-term evaluation of an important intervention like NACAP demonstrates low political accountability regarding the core principles of fighting corruption in the country.

**Lack of a clear implementation plan:** Some of the IPs complained of the lack of a clear implementation plan for the activities of NACAP. For instance, there are no timelines for the implementation of particular activities or the achievement of certain targets to commit the IPs to the plan of action. As a result, each IP decides to implement certain activities at any time, which poses serious threats to the effectiveness and sustainability of NACAP. For example, a representative of the State Departments reported that their department has not yet

implemented any activity of NACAP, and that they were now planning to begin capacity building for their workers in the course of the year. The Information Service Department is one of the core state agencies expected to sensitise and educate the public on NACAP. The lack of a clear implementation plan for NACAP could therefore have serious implications on the level of public awareness about the programme.

Limited awareness of whistleblowing channels and poor protection for whistleblowers: Another factor that threatens the sustainability of NACAP is limited awareness on whistleblowing channels and poor protection for whistleblowers. NACAP encouraged the establishment of whistleblowing channels, allowing citizens to report suspected acts of corruption anonymously. These include the development of software and applications designed to facilitate reporting of corruption. However, some of the participants reported that whistleblowers were not giving adequate protection, which sometimes discouraged individuals from reporting acts of corruption. This single act of poorly protecting the identities of whistleblowers poses a serious threat to the sustainability of the anti-corruption agenda. This could significantly defeat the underlying aim of NACAP since the identification of acts of corruption critically requires information for authorities to act on. In addition, some of the stakeholders were oblivious of the development of any software or applications to facilitate the anonymous reporting of corrupt acts. This could explain the poor protection of the identities of whistleblowers since such persons have to make their reports in-person, which could easily reveal their identities and so become subjects of victimisation. This process could discourage individuals from reporting corrupt practices, which may also negatively influence the sustainability of the programme.

Lack of enforcement of the activities of NACAP: Some of the stakeholders pointed out that the lack of proper enforcement mechanisms to support the implementation of NACAP implied that institutions were not compelled to implement some of the standards, practices, strategies and principles of the programme. This poses a serious threat to the sustainability of NACAP as reported by a representative of an IP that “the lack of an enforceable mechanism to the activities of NACAP threatens its sustainability as institutions choose the activities convenient for them to implement”.

Low involvement of the private sector: Another weakness of NACAP in terms of inclusivity is the inadequate involvement of the private sector. Although the private sector involvement was crafted into NACAP, the review of the Annual Progress Reports revealed that they were not well involved in the implementation phase. Although the private sector is not a vulnerable group, their full participation in the implementation of NACAP would be very crucial in achieving the overall goal of NACAP.

### EXISTING SYSTEMS TO SUSTAIN NACAP

The second dimension under the sustainability of NACAP relates to the measures that we observed to have the potential to sustain the gains of NACAP and its related activities. The evaluation revealed that if these existing systems are further strengthened, they will enhance the sustainability of NACAP. From the evaluation exercise, the following strategies were seen to have the potential to sustain the activities and gains of NACAP:

1. **Broad consultation and participatory:** The fight against corruption involves multiple stakeholders with varying interests. Therefore, for any anti-corruption intervention to be effective and efficient, it requires broad stakeholder consultation and participatory approach. In this regard, the development of NACAP involved broad consultations with Arms of Government, MDAS/MMDAs, Private Sector, Civil Society, Academia, Leaders of the Faith, and Traditional Authorities as well as Regional Consultations. This engendered general acceptance of the NACAP document and its activities.
2. **Strong monitoring and coordination system:** Continuous monitoring and evaluation are essential to track progress and identify areas of improvement. A strong monitoring and evaluation framework,

with clear indicators and timelines, are necessary to ensure that the NACAP remains on track and that adjustments are made when necessary. The NACAP document has strong monitoring and evaluation mechanisms for tracking progress and challenges which include bodies such as HiLIC, Monicom and NISU. Effective anti-corruption strategies require collaboration and coordination among multiple stakeholders, including government agencies, civil society, the judiciary, and the private sector. That is, one of the strengths of NACAP is its emphasis on coordination. However, it came out during the evaluation that there were some financial challenges that hindered the effective implementation of these monitoring mechanisms.

3. **Role of media, civil society and the ordinary citizens:** The media, CSOs and citizens play a crucial role in promoting transparency and accountability. Empowering the media, civil society and the general public through funding, capacity building, and ensuring a supportive environment for their work is essential for sustained anti-corruption efforts. NACAP recognised the crucial role of media, CSOs and ordinary citizens and these stakeholders are well integrated into its framework. However, the potential has not been fully harnessed due to limited resources and other constraints.
4. **The use of focal persons:** The focal persons of NACAP were found to be playing a crucial role for the implementation and sustainability of the programme. These persons were responsible to ensure that NACAP's activities were reflected in the annual programmes of action of the various IPs. It was therefore reported that the maintenance of this operational structure, where focal persons are always in place to continue with the anti-corruption agenda of the IPs will greatly help to sustain the gains of the programme.

## HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION AND LEAVING NO ONE BEHIND

This criterion measures how the implementation of NACAP has adhered to and ensured the core principles of human rights, gender equality and disability inclusion. In other words, it assessed how the NACAP's design and implementation considered and adopted human rights, gender equality and vulnerability/marginalised groups, and gender and inclusion-sensitive approaches. Although the NACAP document does not explicitly focus on these core issues, it was important to assess it through these lenses in order to inform the design of subsequent NACAPs.

### EVALUATION QUESTIONS:

1. To what extent has the NACAP design and implementation fully considered human rights, gender equality and vulnerable/marginalised groups, including women, children, persons with disabilities and the poor?
2. What gender and inclusion-sensitive approaches were adopted by NACAP?

## EXTENT NACAP'S DESIGN AND IMPLEMENTATION CONSIDERED HUMAN RIGHTS, GENDER EQUALITY AND VULNERABLE/MARGINALISED GROUPS

The linkage between corruption and human rights as well as the linkage between the fight against corruption and human rights were documented in NACAP. Specifically, Activity 18 of Strategic Objective 1 of NACAP states that *"Intensify public education on linkage between corruption and fundamental human rights and freedoms to the general public, MDAs and CSOs"*. Section 4.4 (Public Awareness and Education) clearly states

that *“The education must foster a broad societal appreciation of the causes, costs and ramifications of corruption and its linkage to the erosion of human rights”*. These and other important statements in NACAP signify the importance of human rights to the fight against corruption in Ghana.

From the evaluation exercise, it was found that the very structure or framework for the implementation of NACAP was to promote **human rights**. This is reflected in the ToC as the ultimate strategic outcome of NACAP is to promote gender and human rights approaches. A representative of one of the anti-corruption and law enforcement agencies reported that the legal and regulatory architecture established by NACAP was to protect the rights of the individuals by exposing them to the tenets of the law. He added that the continuous engagement of CHRAJ and other IPs with various stakeholders on the awareness creation and sensitisation drive about the legal framework of NACAP was partly to educate them on their rights and responsibilities. This was corroborated by the following assertion from a representative of one of the PSI:

*NACAP includes components that promote public awareness about corruption and the importance of human rights, which aligns with CHRAJ's mandate to educate the public on their rights and responsibilities.*

With the sensitisation drive, workers and the general public are expected to know how to conduct themselves within the remit of the law, empowering them to demand accountability from their engagement with public and private institutions. Thus, knowledge about the law empowers individuals to also defend themselves against any unfair treatment with their engagement with other stakeholders. This was supported by the engagement of local level human rights and civil society organisations to help propagate and advance human rights education in the communities. It was, however, reported by some of the IPs that the lack of regular and consistent engagement of the local actors due to low level of resources was frustrating their efforts to promote human rights through NACAP at the local level.

The passage of the Right to Information Law and the Witness Protection Act was also mentioned as a way to promote human rights. Some of the IPs reported that the citizens have the right to information that governs their welfare, and as such the passage of such a law through NACAP was in a way to empower the citizenry to demand for proper accountability from the state institutions. It was again reported by some of the IPs that the passage of the Whistleblower and Witness Protection Acts was to protect the fundamental human rights of the citizens in the performance of their civic duties as in the provision of information to unearth corrupt practices and acts of corruption as well as availing themselves as witnesses to effectively prosecute corruption-related cases. The creation of independent anti-corruption agencies such as the OSP and EOCO was considered by some of the IPs as giving clear and proper direction to the citizenry as to where to seek for justice and prosecute particular corruption-related cases.

With respect to **gender equality**, NACAP is replete with how corruption affects and is affected by different identified groups in Ghana based on gender and disability. For example, Section 1.2 (NACAP formulation methodology) states that *“Given the disproportionate negative impact of corruption on women, children and other “equity-seeking groups” such as persons with disability and other vulnerable groups, specific attention was paid to issues of gender and fair representation of women in selecting participants for all the activities leading to the development of NACAP”*.

During the interviews, it was reported that policies and guidelines, including service charters, Affirmative Action Law, Disability Act and subsequent revision, Social Protection Bill (2023), among others, have been developed by the various IPs to directly incorporate gender issues into their operations as well as protect vulnerable people. For example, a representative of one of the PSIs had this to say:

*The Office addresses gender-related concerns as part of its operational activities. It includes ensuring that gender considerations are integrated into the civil service's policies and practices. We have also established the public service code of conduct entreating all civil servants to adhere to the guidelines on gender equality and respectful treatment of all employees. The Office also engages in sensitisation efforts that cover various topics, including gender-related issues, to ensure that all staff are informed and equipped to handle these matters appropriately.*

The above extract demonstrates some of the activities implemented through NACAP to promote gender equality in the civil service. Thus, the public service code of conduct aims to ensure that all employees are treated fairly and that their rights are respected.

### GENDER AND INCLUSION-SENSITIVE APPROACHES ADOPTED BY NACAP

Some of the measures adopted through NACAP to promote gender equality included gender balance in recruitment exercises, making public buildings disability friendly and monitoring of gender representation. For example, the representative of the Ghana Audit Service reported that the Service emphasises the importance of gender balance in its recruitment processes, and also encourages female professionals to apply for positions within the Service. It was also reported that the Service regularly conducts headcounts to track the number of male and female employees to ensure a balanced representation in the Organisation. In addition, some of the district assemblies reported that they are committed to making all public buildings under their control disability friendly. The Persons with Disability (PWDs) Act 2006, (Act 715) makes it mandatory for all public buildings to be fitted with disability-friendly facilities to make them accessible to PWDs. It was, however, reported that low level of financial resources and engineering challenges are the main factors hindering their capacity and commitment to fully achieve this goal.

In reference to **vulnerable or marginalised groups**, the evaluation exercise found that several approaches had been adopted by the IPs through NACAP. They included implementation of the disability fund, accessibility to public buildings, inclusivity in education and legal representation in courts. For example, there is the Persons with Disability Amendment Bill (2020) submitted by the National Council on Persons with Disability that seeks to strengthen the legal framework for enhancing the rights and freedoms of persons with disabilities. It was also found that the Ghana Audit Service provides allowances and makes accommodation for workers with various types of disabilities to ensure easy accessibility to the workplace. The district assemblies also indicated that they have established the disability fund and disburse such funds to persons with disability and marginalised groups. Others also mentioned the implementation of the livelihood empowerment against poverty programme, where identified vulnerable individuals are supported with financial resources to improve their living conditions. A representative of a political party indicated that the party focuses on the needs of marginalised groups by ensuring that resources meant for them are not misappropriated.

CHRAJ also reported that they strongly emphasised inclusivity in their public education efforts by ensuring that all community members, including marginalised groups, are included in discussions about corruption. Further, it was found from the evaluation exercise that some of the IPs conduct targeted outreach for the marginalised groups at the community level, focusing on persons with disability, women and children, and encourage them to participate in governance and leadership of their communities. A representative of a PSI reported as follows:

*NACAP has shifted to a bottom-up approach, focusing on grassroots engagement to ensure that marginalised groups, such as women and people with disabilities, are included in anti-corruption efforts. This approach aims to involve the community directly in the fight against corruption.*

The above excerpt shows that NACAP has promoted a culture of transparency and accountability among marginalised groups within the society, and empowered them to take active roles in combating corruption. It was again reported by the Legal Aid Commission that the state funding of the operations of the Legal Aid Commission enabled them to offer free legal services to marginalised individuals, who cannot afford the services of a lawyer. She added that the continuous and improved support from the government is a requisite to enable them to provide continuous support to the vulnerable groups in the society.

## III. CONCLUSIONS

Based on the findings from the desk review and the interviews with the IPs, the following conclusions have been drawn according to the evaluation criteria adopted for the study:

### RELEVANCE

The objectives, outcomes and outputs of NACAP have been perceived as generally relevant to Ghana's fight against corruption under the period 2015-2024. The NACAP activities align with the operational goals, needs and priorities of implementing institutions in addressing corruption issues and practices. Underpinned by Ghana's Constitution, the implementation of NACAP has transcended political regimes and contributed to combating corruption in Ghana through regulatory and legislative reforms.

### EFFICIENCY

Although the implementation of NACAP has been fairly efficient in promoting transparency, accountability, integrity and convenience in accessing public services through digitisation, it was faced with challenges, including poor and high cost of internet connectivity, poor staff and customer adaptation and electronic security concerns. This reduces the reliability and effective use of electronic systems as part of efforts to fight corruption in Ghana and promote national development.

### COHERENCE

It is concluded that the activities of NACAP are consistent with the internal programmes of the IPs, which could be attributed to the integration of NACAP structures to the institutions such as the appointment of focal persons and internalisation of the audit system. Similarly, the activities of NACAP are consistent with international frameworks such as the United Nations Convention Against Corruption. Thus, the strategic objectives and broad major activities of NACAP were found to be aligned with the provisions in the convention against corruption.

### EFFECTIVENESS

There was a general consensus that NACAP has been effective in achieving some of the activities. However, the high-level awareness among the national and regional representatives of the various stakeholders had not fully transcended to the sub-regional levels. Also, even though NACAP activities have helped in mainstreaming anti-corruption ethics and integrity related activities in all sectors of the society, it is yet to yield the needed outcomes. It was found that the utilisation of digital platforms in accessing public services has helped to improve accountability and transparency in the public sector.

### IMPACT

Across the four strategic objectives and 135 activities of NACAP, the evaluation has revealed that the implementation of NACAP has made appreciable impact in building capacity to condemn and fight corruption, institutionalising efficiency, accountability and transparency, engaging individuals, media and CSOs in

reporting and combating corruption and conducting effective investigation and prosecution of corrupt conduct in Ghana. The IPs have engaged several stakeholders on NACAP mostly at the national and regional levels to incorporate anti-corruption measures into their operations. With continuous and aggressive efforts these impacts could be sustained beyond the lifespan of NACAP where citizens and public and private officials will see corruption as a high-risk, low-gain activity.

Moreover, there was some positive behaviour change, which is a reflection of the impact of NACAP. Some of the IPs consistently see the live broadcast of the Public Accounts Committee (PAC) of Parliament as a major agent of behaviour change. Some of them consistently remarked that they do not want to appear at PAC and that they always want to do the right thing. This is a reflection of behaviour change associated with the NACAP and its related activities.

Some respondents declined to be audio recorded and requested permission from their national offices before participating in the evaluation. This suggests that individuals may not feel empowered to openly discuss corruption and related issues. It also indicates that the impact of NACAP activities has not fully trickled down to the local level.

### **SUSTAINABILITY**

While NACAP sets out ambitious goals, achieving these goals requires strong political will, commitment, support and action at all levels of government. Although the implementation of NACAP has made significant strides in fighting corruption and corruption related offences, major challenges exist that threaten the sustainability of the Plan and future Plans. Ghana's political landscape has often been characterised by a lack of sustained commitment and action for anti-corruption reforms, especially when these reforms threaten entrenched political and personal interests.

Although there seems to be some political will, commitment and support in establishing anti-corruption institutions and initiating legislative reforms, there is always a challenge of relatively low political action in following through to prosecutions when it concerns members of their political party. These challenges are also related to adequacy and sustainability of funding for the various activities of NACAP, low political action to fight corruption, inadequate capacity building for staff and focal persons of NACAP and low levels of inclusivity and grassroots engagements and empowerment for reporting and fighting corruption in the country. It is believed that if these challenges are addressed comprehensively, the sustainability and the gains of NACAP and future NACAPs will be improved.

### **HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION AND LEAVING NO ONE BEHIND**

Central to the implementation of the activities of NACAP are issues of human rights, gender equality and inclusion of vulnerable groups such as persons with disability. The passage of the Right to Information Law, the Witness Protection Act and Affirmative Action Bill during the NACAP period marks significant milestones in protecting the rights and freedoms of vulnerable populations in Ghana.

Another weakness of NACAP in terms of inclusivity is the inadequate involvement of the private sector. Although the private sector involvement was crafted into NACAP, the review of the Annual Progress Reports revealed that they were not well involved in the implementation phase. Although the private sector is not a vulnerable group, their full participation in the implementation of NACAP would be very crucial in achieving the overall goal of NACAP.



## IV. RECOMMENDATIONS

Based on the conclusions drawn, the following recommendations have been made to improve the design, development and implementation of NACAP II:

### **RECOMMENDATION 1 – SUSTAINABLE FUNDING FOR NACAP ACTIVITIES**

Sustaining anti-corruption efforts requires consistent funding. The implementation of NACAP has faced financial constraints, which have impacted its effectiveness. This financial resource constraint has been reported in most of the Annual Progress Reports of CHRAJ and also came up in the evaluation exercise. Therefore, CHRAJ should spearhead the securing of long-term funding for anti-corruption initiatives, including exploring innovative financing mechanisms, such as partnerships with the private sector and international organisations. In this regard, CHRAJ should facilitate the establishment of a NACAP Fund to support the implementation of NACAP activities across the various sectors of the economy before the implementation of the next phase of NACAP.

In addition, CHRAJ should push for implementing partners in the public sector to have a clear budget line for the implementation of NACAP activities before approval is given by the appropriate government agency or ministry. Again, reporting on NACAP activities should be part of the key performance indicators (KPIs) of implementing partners in the public sector and should be a basis for resource allocation for subsequent NACAP activities.

### **RECOMMENDATION 2 – STRONGER POLITICAL ACTION**

The success of anti-corruption efforts requires strong political will, commitment, support and action at all levels of government. While the NACAP provides a clear roadmap, implementation has been slow due to the lack of a dedicated budget to support the course of implementation, transfer of focal persons, and low level of awareness at the sub-regional levels of institutions. Governments must not only endorse anti-corruption strategies but also actively support their implementation by providing financial support and institutional reforms to adequately address corruption in Ghana. Although several governments, CHRAJ, HiLIC, Monicom, NISU and other institutions have supported NACAP implementation, CHRAJ should ensure that political leaders are more committed to implementing anti-corruption policies through regular public statements from the highest levels of government reaffirming zero tolerance for corruption and demonstrating transparency and accountability which can set a right tone of integrity across the public sector and committing funds for implementing anti-corruption measures.

A strong political will, commitment, support and action of government, civil society and citizens, will help to ensure the effective implementation of NACAP II activities, culminating in reduced corruption and improved integrity in private and public service. Thus, NACAP II should consider prioritising political action regarding funds and other resources for integrity and accountability.

### **RECOMMENDATION 3 – INCLUSIVITY AND GRASSROOTS ENGAGEMENT**

For anti-corruption strategies to be effective, they must be inclusive and involve grassroots participation. The findings from this evaluation have revealed that NACAP implementation requires the involvement of all segments of society, including the private sector, but the level of engagement with local communities and the general population has been low and inconsistent. In addition, public awareness and education are critical components of the fight against corruption. NACAP emphasises public education to change attitudes and behaviours towards corruption, but reaching the grassroots level has been a challenge. Therefore, CHRAJ, as the coordinating agency of NACAP, should make conscious efforts to engage more with local communities, traditional authorities, and marginalised groups to ensure that anti-corruption initiatives are relevant and impactful at all levels. To achieve this, we recommend that more resources should be dedicated to education and awareness campaigns, with a focus on making these efforts more accessible and engaging for the wider population.

Moreover, another weakness of NACAP in terms of inclusivity is the inadequate involvement of the private sector. Although the private sector involvement was crafted into NACAP, the review of the Annual Progress Reports revealed that they were not well involved in the implementation phase. Although the private sector is not a vulnerable group, their full participation in the implementation of NACAP would be very crucial in achieving the overall goal of NACAP.

### **RECOMMENDATION 4 – CONTINUOUS CAPACITY BUILDING**

There was a general weakness noted by respondents in the training and retraining of Focal Persons, where capacity building programmes are organised on an ad hoc basis. Capacity building of Focal Persons should be an integral part of the implementation of any future NACAP. CHRAJ should design a standard schedule of training and capacity building programmes for the Focal Persons throughout the implementation of NACAP.

Also, CHRAJ should lobby for NACAP Focal Persons to be made a designated portfolio within the administrative structures of the public implementing institutions, especially MDAs and MMDAs. This will ensure that even if they are transferred to different regions or districts, they will continue to perform the same functions rather than being given a different schedule outside NACAP activities.

It is also recommended that CHRAJ regularly update its list of Focal Persons for NACAP to appropriately track the achievements and challenges in the implementation of the Action Plan.

### **RECOMMENDATION 5 – RESULTS-BASED DESIGN OF NACAP II**

The development of NACAP did not include an explicit theory of change against which implementation could be addressed and did not incorporate a mid-term evaluation. It is, therefore, recommended that the design of any future NACAP should incorporate an explicit theory of change and a mid-term evaluation to identify successes and weaknesses in order to shape the remaining year of the Action Plan implementation.

The NACAP document (2015) clearly outlines that “Evaluation efforts will include commissioning and supervision of a number of evaluation efforts: term-end evaluations {i.e., at end of years 3 and 5}, ad-hoc evaluations, special thematic studies and final evaluations {i.e., at end of year10} to inform the formulation of the next NACAP”. However, apart from the annual progress from CHRAJ, only the end-term evaluation was commissioned. Therefore, at least a mid-term evaluation is imperative. Mid-term evaluation represents

process evaluation to measure what is working, what is not working, what needs to change and what needs to be maintained. This does not have to include all the seven evaluation criteria but rather should focus on relevance, coherence, effectiveness, efficiency and human rights and inclusivity because impact and sustainability are long-term criteria that are more relevant after the intervention or the Action Plan.

Also, beyond population-based corruption surveys, NACAP II should also institutionalise institution-based corruption surveys to unearth context specific issues for redress. This will provide a comprehensive perspective of the state and nature of corruption in the country in order to shape the design and implementation of strategies to deal with it.

Finally, anti-corruption strategies should be integrated into the strategic plans and policy documents. Our review indicated that anti-corruption activities were not an integral part of these strategic documents that drive the vision of the institutions.

## V. LESSONS LEARNED AND GOOD PRACTICES

### LESSONS LEARNED AND GOOD PRACTICES

The implementation of the Ghana National Anti-Corruption Action Plan (NACAP) has provided valuable insights into the complexities of fighting corruption in Ghana. This section highlights the key lessons learnt and good practices from the 10-year implementation of NACAP under the following subheadings:

**Broader consultation:** The development of NACAP involved broad consultations with Arms of Government, MDAS/MMDAs, Private Sector, Civil Society, Academia, Leaders of the Faith, and Traditional Authorities as well as Regional Consultations. This engendered general acceptance of the NACAP document and its activities.

**Strong monitoring and coordination system:** The NACAP document has strong monitoring and evaluation mechanisms for tracking progress and challenges which include bodies such as HiLIC, Monicom and NISU. Effective anti-corruption strategies require collaboration and coordination among multiple stakeholders, including government agencies, civil society, the judiciary, and the private sector. One of the strengths of NACAP is its emphasis on coordination, although some challenges exist in achieving this effectively. It came to light that there were some financial challenges to effectively implement these monitoring mechanisms.

**Role of media, civil society and the ordinary citizens:** NACAP recognised the crucial role of media, CSOs and ordinary citizens and these stakeholders are well integrated into its framework. However, the potential has not been fully harnessed due to limited resources and other constraints. Empowering the media, civil society and the general public through funding, capacity building, and ensuring a supportive environment for their work is essential for sustained anti-corruption efforts.

## ANNEX I: TERMS OF REFERENCE

## BACKGROUND AND CONTEXT

Plan duration (mm/yy-mm/yy):	2015-2024
Location (Country and sub-national focus areas, if relevant):	Ghana
Leading Institution(s):	Commission on Human Rights and Administrative Justice (CHRAJ)
Implementing institutions:	
End Beneficiaries/Recipients:	
Total Approved Budget (USD):	TBD
Name and title of evaluation focal point:	Prof. Samuel Kobina Annim (Ghana Government Statistician)
Time frame of evaluation: (planned start and end date of the evaluation process)	November 2023 to June 2024
Number of independent evaluators planned for this evaluation:	Five – Evaluation Manager (Ghana Statistical Service [GSS] - Represented by Prof. S. K. Annim); two national evaluation experts (team leader and team member); one international evaluation expert; and one international anti-corruption expert.

The National Anti-Corruption Action Plan (NACAP) (2015 - 2024) was developed through a wide-scale multi-stakeholder consultation process. The overall objective of NACAP is to promote and mainstream the values of integrity, transparency and accountability in all sectors of society and ensure effective enforcement of anti-corruption laws in Ghana. This is premised on the prevention, education and enforcement approach.

The development of the Plan was informed by the rising incidence of corruption in Ghana and the inadequacy of past efforts to tackle it more effectively. Reasons for the high levels of corruption in Ghana include a limited commitment to the values of integrity and self-discipline, minimal system of accountability and transparency, impunity and over politicisation of corruption and crime. The NACAP, therefore, aimed to, among others, increase awareness of the linkage between human rights and corruption as well as attention to gender in anti-corruption programming and unregulated discretion in the use of public authority. It also sought to strengthen partnerships with civil society and other non-state actors, including the private sector.

The target population/main beneficiaries include the Executive, Ministries, Departments and Agencies (MDAs) and Metropolitan, Municipal and District Assemblies (MMDAs), Parliament, Judiciary, Anti-Corruption and Law Enforcement Agencies, Independent Government Institutions, Media, Civil Society Organisations (CSOs), Private Sector Organisations, Development Partners, Political Parties, and General Public.

The key partners of the NACAP are the European Union (EU) and the United Nations Office on Drugs and Crime (UNODC). The implementing partners (IPs) include public, private and not-for-profit organisations and institutions. Key implementing Government entities comprise the Executive arm of Government in Ghana, Commission on Human Rights and Administrative Justice (CHRAJ), and Economic and Organised Crime Office (EOCO).

To improve inclusivity, the implementation of NACAP takes cognisance of gender, disability inclusion and human rights integration. NACAP has implemented some broad activities through the High-Level Implementation Committee (HiLIC). The achievements include the automation of the superior and circuit courts, electronic case distribution system, introduction of integrity awards, computerised revenue generation systems and development of code of conduct for Members of Parliament (MPs). The NACAP, which commenced in 2015, closes in 2024. The key partners of NACAP, thus, seek to conduct an independent

evaluation of the achievements of the Plan. The evaluation will also document lessons drawn, experiences and insights gained from the implementation of NACAP to inform its future design and development and the rollout of similar plans.

Objectives of the National Anti-Corruption Action Plan - Ghana	
Objective 1:	To build public capacity to condemn and fight corruption and make its practice a high risk, low gain activity.
Objective 2:	To institutionalise efficiency, accountability and transparency in the public, private and not-for-profit sectors.
Objective 3:	To engage individuals, media and civil society organisations in reporting and combating corruption.
Objective 4:	To conduct effective investigations and prosecution of corrupt behaviour.

## PURPOSE AND SCOPE OF THE EVALUATION

Planned utilisation of the evaluation results:	The primary purpose of the evaluation is to assess the achievements of NACAP after its implementation and to inform future development of NACAP and rollout of similar plans. Lessons from this evaluation will inform strategies and action plans for other countries in Africa.
Main users of the evaluation results:	Government, private and not-for-profit organisations and institutions as well as Civil Society Organisations, the general public and development partners
Unit of analysis (full projects/segment/etc.)	Full project with all relevant implementing institutions
Time period covered by the evaluation:	2009-2014 (pre-implementation phase); and 2015-2024 (implementation phase)
Geographical coverage of the evaluation:	Ghana

## EVALUATION CRITERIA

The evaluation will be conducted based on the below selected relevant OECD/DAC criteria. All evaluations include gender, human rights, disability inclusion and no one left behind. Ideally these are mainstreamed within the evaluation questions. Moreover, the evaluation needs to identify lessons learned and good practices. The evaluation questions will be further refined by the Evaluation Team in the drafting of the Inception Report.

Criteria	Evaluation question
Relevance: Is the intervention doing the right thing?	To what extent has the NACAP been relevant to stakeholder’s needs and priorities? To what extent was the NACAP designed in a results-oriented, inclusive and participatory manner? To what extent are the outcomes, outputs, and activities of the NACAP relevant to achieving its objective?
Coherence: How well does the intervention fit?	To what extent has the NACAP delivered results in line with national, regional and international priorities? To what extent has the NACAP established and maintained appropriate partnerships?
Efficiency: How well are resources being used?	To what extent has the NACAP delivered outputs in a timely and efficient manner?

Criteria	Evaluation question
Effectiveness: Is the intervention achieving its objectives?	To what extent did the NACAP achieve its intended outcomes and objective? What have been the facilitating or hindering factors in achievement of results?
Impact: What difference does the intervention make?	To what extent did the NACAP achieve societal changes? To what extent has the NACAP generated or is expected to generate significant positive or negative, intended or unintended, higher-level effects?
Sustainability: Will the benefits last?	To what extent are the benefits of the NACAP likely to continue after it ends? To what extent has local ownership by beneficiaries and national and/or regional stakeholders been achieved?
Human rights, gender equality, disability inclusion and leaving no one behind: Has the intervention been inclusive and human rights based?	To what extent has the project design and implementation fully considered human rights, gender equality as well as marginalised groups, including people with disabilities?

## EVALUATION METHODOLOGY

All evaluations should be guided by the principles of human rights, gender equality, disability inclusion and leaving no one behind. Gender-sensitive and disability inclusive evaluation methods and gender-sensitive and disability inclusive data collection techniques are, therefore, essential to identify key gender issues, address marginalised, disabled, hard-to-reach and vulnerable population.

### Methods to collect and analyse data

While the evaluation team will fine-tune the methodology for the evaluation in an Inception Report, a mixed-methods approach of qualitative and quantitative methods is mandatory due to its appropriateness to ensure that evaluation conclusions, findings, recommendations, and lessons learned are substantiated by evidence and based on sound data analysis and triangulation; as well as a gender-sensitive, inclusive, respectful and participatory approaches and methodologies to capture disability and gender equality issues. Thus, the evaluation will adopt the participatory qualitative research approach through the use of In-Depth Interviews (IDIs) and Focus Group Discussions (FGDs). This approach will ensure that evaluation conclusions, findings, recommendations, and lessons learned are substantiated by evidence and based on sound data analysis; as well as gender-sensitive, inclusive, respectful and participatory approaches and methodologies to capture disability and gender equality issues.

Special attention will be paid to (i) ensure that the voices and opinions of men, women and other marginalised groups, such as people with disabilities, are heard (including gender-related and disaggregated data by age, sex, institutions and sectors); and (ii) ensure an unbiased and objective approach and the triangulation of sources, methods, data, and theories.

The strategy is to use the HiLIC of NACAP to contact and build rapport with the implementing institutions of NACAP, particularly Government, private and not-for-profit organisations and institutions. Then, the Consultants will engage the institutions on an individual basis through in-depth interviews. In addition to the implementing institutions, the Consultants will engage political parties and CSOs through FGDs to explore the perspectives and experiences of the public on the implementation of the activities of NACAP.

The limitations to the evaluation need to be identified and discussed by the evaluation team in the Inception Report, e.g., data constraints (such as missing baseline and monitoring data). Potential limitations as well as the chosen mitigating measures should be included. The evaluation team will be asked to present a dedicated methodology in the Inception Report outlining the evaluation criteria, indicators, sources of information and

methods of data collection. Ideally the evaluation methodology must conform to the United Nations Evaluation Group (UNEG) Norms and Standards.

The Consultants will adopt various mechanisms to guide the implementation of the evaluation and ensure quality data. The Consultants will be involved in the data collection and analysis to ensure that the data collected are of optimal quality. The evaluation team is also expected to use interviews, surveys, observation and/or any other relevant quantitative and/or qualitative tools as a means to collect relevant data for the evaluation. Additional information, including case study, will be for the evaluation. While maintaining independence, the evaluation will be carried out based on a participatory approach, and include the views and assessments of all parties identified as the stakeholders of the project/ programme.

All the soft copies of the data collected will be stored in a password-protected file on a secured laptop. Furthermore, the audio tapes of the interviews and FGDs will be permanently deleted from the recorders, while the Microsoft Word format of the transcripts will be saved on a secure laptop. All the data gathered will be fully anonymised (as much as practicable) before analysing and archiving them.

Content analysis of the quarterly and/or annual reports and Logframe of NACAP implementation will also be conducted. With expressed permission and at the convenience of the respondents, the interview sessions will be audio-recorded and later transcribed. The transcripts will be analysed using NVIVO software, and the results will be presented based on the emerging themes.

Templates for all deliverables (Inception Report; Evaluation Report; Evaluation Brief; presentations) will be provided by UNODC-IES to the evaluation team throughout the process.

#### TIME FRAME AND DELIVERABLES

Subsumed tasks, roles by the Government of Ghana	UNODC support	Guidance / Process description
<b>Finalisation of Terms of Reference (ToR) – from 02 October – 20 October 2023</b>		
Prepare evaluation ToR, based on the template provided, and discuss any questions with UNODC/IES; share with selected focal points, and finalise ToR based on feedback; agree on the evaluation team.	IES shares the ToR template with the Evaluation Manager, amend template based on identified needs, provides guidance on ToR creation, provides technical feedback on ToR, suggests evaluation team members	The Evaluation Manager in coordination with the Commission on Human Rights and Administrative Justice (CHRAJ) creates ToR and shares it with IES and relevant stakeholders; in parallel consultations on evaluation team and outreach takes place; ToR is amended and finalised by Evaluation Manager
<b>Recruitment - from 20 October – 24 November 2023</b>		
Consultation with IES on potential evaluators; choose evaluation team members.	Suggest evaluation team to the Evaluation Manager, conduct recruitment process.	Review and clearance of evaluators by the Evaluation Manager in coordination with CHRAJ before recruitment can be initiated by UNODC.
<b>Inception Report, incl. desk review - from 27 November 2023 to 19 January 2024</b>		
Organise kick-off meeting with the Evaluation Manager, CHRAJ, any relevant stakeholders, UNODC and evaluators; provide documents for the desk review	Provision of Inception report template to the Evaluation Manager, attend kick-off meeting, technical guidance on data collection efforts,	Includes 2 weeks review by the Evaluation Manager in coordination with CHRAJ and IES; IES participates in the kick-off meeting; engagement between IES,



THE GHANA NATIONAL ANTI-CORRUPTION ACTION PLAN [NACAP: 2015-2024]

Subsumed tasks, roles by the Government of Ghana	UNODC support	Guidance / Process description
by evaluators, followed by draft Inception Report; Review of the Inception Report by Evaluation Manager in coordination with CHRAJ and IES; clearance of revised Final Inception Report by the Evaluation Manager; logistical preparations by Evaluation Manager in coordination with CHRAJ and in consultation with evaluators and UNODC for interviews and other data collection efforts.	technical review of Inception report.	Evaluation Manager and evaluators as necessary.
<b>Data collection (incl. field missions) &amp; ongoing data analysis - from 29 January to 8 March 2024</b>		
Preparation of logistics, mission schedule, interviews, observation and site visits, etc. for the evaluators and coordination of field missions.	Provision of data collection best practices and technical review of data collection tools.	Coordination of data collection dates and logistics by the Evaluation Manager in coordination with CHRAJ and support to the evaluation team.
<b>Data validation workshop (1 day) - March</b>		
Preliminary findings presentation to Evaluation Manager in coordination with CHRAJ.	Attend preliminary findings presentation.	Presentation/workshop with Evaluation Manager, CHRAJ and relevant stakeholders to validate findings following data collection.
<b>Analysis and draft report - from 11 March to 5 April 2024</b> <b>Draft report for CLP comments (1 week) – April 2024</b>		
Data analysis and drafting of report by evaluators	Provision of evaluation report template.	Includes 2 weeks review by Evaluation Manager in coordination with CHRAJ and technical assessment by IES.
Review by Evaluation Manager in coordination with CHRAJ and IES; revision of draft report by evaluators.	Technical review of evaluation report.	
Send request for comments to CLPs.		The Evaluation Manager sends request to CLPs for comments; CLPs send comments directly to evaluators.
<b>Final report, evaluation brief, PowerPoint slides, and External Quality Assessment - from 6 May to 30 June 2024</b>		
Provide any further information as needed for the revision of the report by evaluators; Evaluation report, 2-page Evaluation Brief and PowerPoint slides are finalised by evaluators based upon feedback by Evaluation Manager in coordination with CHRAJ and technical advice by	Technical review of final report, presentation and brief, guidance on MR and EFP development to Evaluation Manager and Commission on Human Rights and Administrative Justice	Includes 1 week review and clearance by Evaluation Manager in coordination with CHRAJ of Final Report and Brief and 1 week review by IES of Brief and PowerPoint slides; 1 week for external quality assessment facilitated by IES

Subsumed tasks, roles by the Government of Ghana	UNODC support	Guidance / Process description
IES; external quality assessment of report; completion of MR and EFP by Evaluation Manager in coordination with CHRAJ; editing/publishing of final report.		
<b>Presentation (1 day) - June 2024</b>		
Presentation organised by Evaluation Manager in coordination with CHRAJ at key events within 4 weeks of finalisation of the evaluation.	Support in organisation of presentation/workshop and provision of technical support, participation in the presentation of evaluation results.	Date of presentation of final results to be agreed between Evaluation Manager, CHRAJ, IES and evaluators; Evaluation Manager in coordination with CHRAJ to open the presentation together with UNODC. Further presentations should be planned as needed.

#### EVALUATION TEAM COMPOSITION

Role	Number of consultants (national/international)	Specific expertise required
Evaluation Expert	1 (international consultant)	Evaluation methodology; experience in leading a team
Substantive Expert	1 (international consultant)	Expertise in Anti-Corruption
Gender Expert	1 (international consultant)	Expertise in gender issues and analyses
National Evaluation Expert	2 (National evaluators/consultants)	Evaluation methodology; experience in leading a team

The evaluation team will not act as representatives of any party and must remain independent and impartial and must not have been involved in the design and/or implementation, supervision and coordination of and/or have benefited from the programme/project or theme under evaluation.

In addition to the independent evaluation team, members of the Ghana Statistical Service will be assigned to provide dedicated support to the evaluation team and work in coordination with them on required tasks and activities.

Furthermore, the evaluation team shall respect and follow the UNEG Ethical Guidelines for conducting evaluations in a sensitive and ethical manner. The qualifications and responsibilities for each evaluation team member are specified in the respective job descriptions attached to these Terms of Reference (Annex 1). The evaluation team will report exclusively to UNODC who will facilitate the payment of the deliverables once these are approved by the Government of Ghana.

Payments will be made by deliverable and only once cleared by the Government of Ghana. Deliverables which do not meet UNEG evaluation norms and standards, the external quality assessment and the requirements as per the templates shared for this particular evaluation will not be cleared.

**ROLES AND RESPONSIBILITIES IN EVALUATION PROCESS**

Evaluation stage	Government of Ghana	UNODC	Evaluation team
Overall	Provide management, administrative and logistical support to the evaluation process, as well as final clearance of all deliverables.	Provide support by sharing adapted templates for all deliverables, guidance and technical review of deliverables.	Submit deliverables on time and meeting quality standards, as per provided guidance and templates, in line with UNEG and international evaluation Norms and Standards.
ToR	Review, revise and complete the evaluation ToR template and share with IES for technical review.	Share ToR template with the evaluation manager and CHRAJ; engage with Evaluation Manager in coordination with CHRAJ on evaluation scope, questions, etc. as needed; multiple rounds of comments as required	
	Identify key stakeholders and CLPs	Identify qualified evaluation team and reach out to evaluators for inquiry of interest.	
	Compile the desk review material		
	Identify, jointly with IES, potential evaluators and experts		
Recruitment	Approve evaluation team proposed by UNODC.	Propose evaluation team before recruitment process starts. Conduct recruitment of international consultants.	Submit all required documentation for the selection and recruitment process
	Finalise the compilation of the desk review material		
Inception Report	Engage with the evaluation team and provide all required information, documents, stakeholder lists, schedule kick-off meeting in consultation with IES; review and clear Evaluation Inception Report. Share the inception report with UNODC for technical review	Attend the kick-off meeting, and provide relevant templates and guidance, technically review draft Inception Report to ensure a sound evaluation methodology is in place	Participate in kick-off meeting; Draft Inception Report in line with provided templates and guidelines
		Release payment of Inception report once cleared by the Evaluation Manager in coordination with CHRAJ	Provide Final Inception Report
Data collection and analysis	All logistical arrangements for the evaluators, including travel arrangements, set-up of	Timely travel arrangements, payments of DSAs, etc. Provide guidance on the evaluation process to the	Conduct an independent, participatory and high-quality data collection.

THE GHANA NATIONAL ANTI-CORRUPTION ACTION PLAN [NACAP: 2015-2024]

Evaluation stage	Government of Ghana	UNODC	Evaluation team
	interviews as requested, note verbales, transportation, etc.	evaluation team and/or the Evaluation Manager and CHRAJ, as needed; engage with the evaluation team on a regular basis, participate in evaluation team meetings, briefings, etc. as necessary.	
			Implement the methods and tools developed in the Inception Report.
	Participate in de-briefings, as necessary		Engage with Evaluation Manager and CHRAJ, as well as other key stakeholders as identified by the Evaluation Manager, to request further information and assistance as required. Conduct de-briefings to Evaluation Manager and CHRAJ and IES, as necessary; Conduct a preliminary findings presentation for validation the Evaluation Manager and relevant stakeholder
	Provide further data, documents, stakeholders, etc. as requested by the evaluation team.		Conduct a thorough analysis to ensure triangulation of evidence.
Draft report			Provide a high-quality draft report, in line with UNEG and international evaluation Norms & Standards
	Review of the draft report and provide comments to the evaluation team as necessary	Technical Review of the draft report once shared by the Evaluation Manager	Incorporate comments of the evaluation manager, CHRAJ and relevant stakeholders and technical comments of UNODC
	Share draft report with CLPs for review after IES review	Release payment, once draft report is cleared by the evaluation manager in coordination with CHRAJ	
			Incorporate comments of CLPs.
Final report, Brief and Presentation	Complete Management Response (MR) and Evaluation Follow-up Plan (EFP)	Provide, brief and presentation templates to the evaluation team. Provide MR and EFP templates as well as	Finalise the report, 2-page Evaluation Brief and PowerPoint slides.

Evaluation stage	Government of Ghana	UNODC	Evaluation team
		guidance to the Evaluation Manager in coordination and CHRAJ	
	Review the 2-page Evaluation Brief and PowerPoint slides and organise a presentation of the results to internal and external stakeholders in consultation with UNODC	Technical review of brief and presentation. Support the evaluation manager and CHRAJ in organising key findings presentations events/workshops	Present the results at multiple occasions as agreed with Evaluation Manager and as cleared by the evaluation manager within 4 weeks of approval of the final evaluation report.
	The Evaluation Manager to provide clearance of all final deliverables	Release final payment, once cleared by the evaluation manager in coordination with CHRAJ	
Follow-up	Annual update on the implementation of recommendations. Hold follow up action workshop to assess the progress based on evaluation findings and recommendations.	Support CHRAJ in organising follow up action workshop to assess the progress based on evaluation findings and recommendations.	

**EVALUATION EXPERT (TEAM LEADER)**

**Specific tasks to be performed by the Evaluation Expert (Team Leader):**

Under the guidance and supervision of the Chief or the Deputy Chief of the UNODC Independent Evaluation Section at Headquarters (Vienna, Austria) and the Evaluation Manager of the Government of Ghana, the key responsibilities of the Evaluation Expert (Team Leader) include:

- Conduct a desk review of relevant documents and engage with Evaluation manager in coordination with CHRAJ from the onset for requesting further documentation, etc.
- Develop the evaluation design, in line with requirements of the Inception Report template, with detailed method, tools and techniques that are gender-inclusive and gender-sensitive, generating information from and about men, women and other marginalised groups, as well as key gender, disability inclusion and human rights issues;
- Conduct a high-quality data collection phase, based on the approved Inception Report, by implementing all approved data collection tools and methods in an inclusive and participatory manner. Ensure that all requirements as per the approved Inception Report are met.
- Conduct a high-quality data analysis, including using related tools and software (e.g., NVivo), and ensure that IES has access to all raw data at any given point in time.
- Conduct a preliminary findings workshop for validation with the Evaluation and CHRAJ staff
- Ensure adherence to the United Nations Evaluation Group (UNEG) and international evaluation Norms and Standards, and the full evaluation terms of Reference (ToR) and participate in kick-off meeting;
- Lead and guide the independent evaluation team, having clear work plans developed and ensuring high-quality deliverables fully meeting evaluation norms and standards.
- Ensure that all deliverables mentioned in these terms of reference are submitted in a timely and satisfactory manner, and in line with the quality criteria checklist;

- Ensure that the identified evaluation manager and IES focal point is fully informed of the evaluation process, is invited to all meetings of the evaluation team and has access to all collected data throughout the evaluation process.
- Provide various presentations/briefings throughout the evaluation process, as requested;
- Effectively coordinate and interact, throughout the entire evaluation process, with the Substantive Expert(s)/evaluation team. Request drafted inputs (and revisions of such) from the Substantive Expert(s)/evaluation team for all deliverables.

**Expected tangible and measurable output(s)/deliverable(s):**

The Evaluation Expert is responsible for the quality and timely submission of his/her specific deliverables, as specified below. All products should be well written in English and have a clear, transparent and verifiable analysis process. The evaluation team will report exclusively to the Chief or the Deputy Chief of the UNODC Independent Evaluation Section (IES) and the Government of Ghana. The Government will be the sole clearing entity of all deliverables of this evaluation and IES will provide technical advice and guidance.

The Evaluation Expert will interact with the Substantive Expert(s)/evaluation team and the evaluation focal point throughout the entire evaluation process, requesting drafted inputs (and revisions of such) from the Substantive Expert(s)/evaluation team for all deliverables. The Evaluation Expert is responsible for the following deliverables:

- Inception report in line with international evaluation norms, standards, guidelines and the provided templates. This includes a desk review summary, refined evaluation questions, data collection instruments (including surveys/questionnaires and interview guides), sampling strategy, evaluation matrix and limitations to the evaluation (respecting potential COVID-related restrictions on travel and in-person meetings). Submission to the Government of Ghana through email for review and clearance;
- Implement a high-quality data collection based on the instruments from the cleared Inception Report, ensuring that ethical considerations for evaluations in the UN are fully met;
- A detailed overview of data collection efforts (e.g., per email) with dates and times of field missions, number of stakeholders interviewed, survey respondents, etc.
- Implement a high-quality data analysis, ensuring that all evaluation results are based on triangulated evidence and that the standards for evaluation in the UN and at UNODC are fully met;
- Oral briefing of initial observations to the Evaluation Manager and CHRAJ team and IES (if applicable);
- Conduct a preliminary findings workshop for validation with the Evaluation manager, CHRAJ and any relevant stakeholders;
- Draft report in line with UNEG evaluation norms and standards. This also includes an analysis of the performance of the project to adequately address gender equality, disability inclusion as well as human rights issues, with concrete findings, conclusions and recommendations. Submission to the evaluation manager for review and clearance (may entail various rounds of comments and revision in accordance); A briefing on the draft report with the evaluation manager in coordination with CHRAJ together with IES may also be organised. This will be based on discussion with IES and the Evaluation Manager.
- Revised draft report based upon comments received from the various consultative processes (IES, evaluation manager, CHRAJ and Core Learning Partners), including full proof reading;
- Finalisation of the Final Evaluation Report in line with UNEG evaluation norms and standards. In addition, a 2-page evaluation brief and PowerPoint presentations on final evaluation results, including full proofreading and editing. Submission to the evaluation manager for review and clearance (may entail various rounds of comments and revision). Final presentations of evaluation results to internal and external stakeholders, as requested by the evaluation manager. This may also include a separate briefing with the evaluation manager in coordination with CHRAJ and IES.

According to UNEG Norms and Standards, the Evaluation Expert shall not have had any responsibility for the design, implementation or supervision of any of the projects, programmes or policies that he/she is evaluating and/or have benefited from the programme or project or theme under evaluation. The Government of Ghana

is the sole clearing entity for all evaluation deliverables and products. The Evaluation Expert must respect the UNEG Ethical Guidelines.

**Qualifications/expertise** sought (required educational background, years of relevant work experience, other special skills or knowledge required)

- Advanced university degree (Master’s degree or equivalent) in Social Sciences or related field is required. A first level university degree (Bachelor’s degree or equivalent) in similar fields in combination with two additional years of qualifying experience may be accepted in lieu of the advanced university degree.
- A minimum of 15 (fifteen) years professional technical experience in the field of evaluation or related field, including a track record of conducting various types of evaluation at the international level, preferably with experience in conducting evaluations for the United Nations is required;
- Experience in leading a team is required;
- Knowledge and experience of the UN System and in particular of UNODC is desirable;
- Knowledge of quantitative and qualitative methods is required;
- Experience in gender sensitive evaluation methodologies and analysis, and understanding of human rights, disability inclusion and ethical issues in relation to evaluation is desirable;
- Experience in presenting and communicating complex evaluation or research results in a structured manner (in reports, briefs, presentations, etc.) is required;
- For this assignment, fluency in oral and written English and Ghanaian language(s) is required.

***SUBSTANTIVE EXPERT (TEAM MEMBER)***

**Specific tasks to be performed by the Substantive Expert (Team Member):**

Under the guidance and supervision of the Chief or the Deputy Chief of the UNODC Independent Evaluation Section at Headquarters (Vienna, Austria) and the Evaluation Manager of the Government of Ghana, the Substantive Expert, in close coordination and cooperation, will collaborate with the Evaluation Expert and the evaluation team throughout the entire evaluation process, and contribute to the following tasks:

- Provide substantive inputs in relation to the area of expertise to the whole evaluation process and to all deliverables, and participate in kick-off meeting;
- Contribute to a desk review of relevant documents, research products, etc.;
- Contribute, in particular with expert knowledge, to the development of the evaluation design, in line with requirements of the Inception Report template, with detailed method, tools and techniques that are gender-inclusive and gender-sensitive, generating information from and about men, women and other marginalised groups, as well as key gender, disability inclusion and human rights issues;
- Contribute to conducting a high-quality data collection phase, based on the approved Inception Report, by implementing all approved data collection tools and methods in an inclusive and participatory manner. Ensure that all requirements as per the approved Inception Report are met.
- Contribute to conducting a high-quality data analysis, including using related tools and software (e.g., NVivo), and ensure that the evaluation manager has access to all raw data at any given point in time.
- Contribute to conducting a preliminary findings workshop for validation with project staff
- Contribute to ensuring adherence to the United Nations Evaluation Group (UNEG) Norms and Standards, and the full evaluation terms of Reference (ToR) and participate in kick-off meeting;
- Ensure that all deliverables mentioned in these terms of reference are submitted in a timely and satisfactory manner, and in line with the quality criteria checklist;
- Contribute to various presentations/briefings throughout the evaluation process, as requested

**Expected tangible and measurable output(s)/deliverable(s):**

The Substantive Expert will be responsible for the quality and timely submission of his/her specific deliverables, as specified below. All products should be well written in English, and have a clear, transparent and verifiable analysis process. The evaluation team will report exclusively to the Chief or the Deputy Chief of

the UNODC Independent Evaluation Section and the Government of Ghana. The Government will be the sole clearing entity of all deliverables of this evaluation and IES will provide technical advice and guidance.

The **Substantive Expert**, in close coordination and cooperation, will collaborate with the Evaluation Expert and the evaluation team throughout the entire evaluation process, and contribute to the following tasks:

- Draft inputs in relation to the area of expertise to the inception report. This includes a desk review summary, refined evaluation questions, data collection instruments (including surveys/questionnaires and interview guides), sampling strategy, evaluation matrix and limitations to the evaluation (respecting potential COVID-related restrictions on travel and in-person meetings). Submission to the Government of Ghana for review and clearance (may entail various rounds of comments). Revise inputs in relation to the area of expertise to required changes.
- Contribute to an Inception report, this includes a desk review summary, refined evaluation questions, data collection instruments (including surveys/questionnaires and interview guides), sampling strategy, evaluation matrix and limitations to the evaluation (respecting potential COVID-related restrictions on travel and in-person meetings). Submission to the evaluation manager for review and clearance and IES may share it with Project Management for a review of factual errors;
- Contribute to the implementation of a high-quality data collection based on the instruments from the cleared Inception Report, ensuring that ethical considerations for evaluations in the UN are fully met;
- Contribute to a detailed overview of data collection efforts (e.g., per email) with dates and times of field missions, number of stakeholders interviewed, survey respondents, etc.
- Contribute to implementing a high-quality data analysis, ensuring that all evaluation results are based on triangulated evidence and that the standards for evaluation in the UN are fully met;
- Contribute to an oral briefing of initial observations to the Evaluation Manager, CHRAJ and IES (if applicable);
- Contribute to conducting a preliminary findings workshop for validation with the Evaluation Manager and CHRAJ;
- Draft inputs and contribute to a draft report in line with UNEG evaluation norms, standards. This also includes an analysis of the performance of the project to adequately address gender equality, disability inclusion as well as human rights issues, with concrete findings, conclusions and recommendations. Submission to the evaluation manager for review and clearance (may entail various rounds of comments and revision in accordance); A briefing on the draft report with the evaluation manager in coordination with CHRAJ together with IES may also be organised. This will be based on discussion with IES and the Evaluation Manager;
- Contribute to the revised draft report based upon comments received from the various consultative processes (IES, evaluation manager in coordination with CHRAJ, and Core Learning Partners), including full proof reading;
- Contribute to the finalisation of the Final Evaluation Report. In addition, a 2-page evaluation brief and PowerPoint presentations on final evaluation results, including full proofreading and editing. Submission to the evaluation manager for review and clearance (may entail various rounds of comments and revision in accordance). Contribute, as necessary, to the final presentations of evaluation results to internal and external stakeholders, as requested by the evaluation manager in coordination with CHRAJ. This may also include a separate briefing with the evaluation manager, CHRAJ and IES.

According to UNEG Norms and Standards, the Evaluation Expert shall not have had any responsibility for the design, implementation or supervision of any of the projects, programs or policies that he/she is evaluating and/or have benefited from the programme or project or theme under evaluation. The Government of Ghana is the sole clearing entity for all evaluation deliverables and products. The Evaluation Expert must respect the UNEG Ethical Guidelines.



**Qualifications/expertise** sought (required educational background, years of relevant work experience, other special skills or knowledge required)

- Advanced university degree (Master’s degree or equivalent) in Social Sciences or related field is required. A first level university degree (Bachelor’s degree or equivalent) in similar fields in combination with two additional years of qualifying experience may be accepted in lieu of the advanced university degree.
- A minimum of 7 (seven) years professional technical experience in evaluation and is required;
- Professional technical experience in the field of evaluation or related field, including a track record of conducting various types of evaluation at the international level, preferably with experience in conducting evaluations for the United Nations is desirable;
- Experience in working in a team is required;
- Knowledge and experience of the UN System and in particular of UNODC is desirable;
- Knowledge of quantitative and qualitative methods is desirable;
- Experience in gender sensitive evaluation methodologies and analysis, and understanding of human rights, disability inclusion and ethical issues in relation to evaluation is desirable;
- Experience in presenting and communicating complex evaluation or research results in a structured manner (in reports, briefs, presentations, etc.) is required;
- For this post, fluency in oral and written English and Ghanaian language(s) is required.

**LIST OF BACKGROUND DOCUMENTS FOR DESK REVIEW**

Document – name
NACAP (2015-2024) Document
Full evaluation ToR of the NACAP
NACAP Annual Reports
NACAP 2022 Monitoring and Evaluation Framework for Data Collection and Reporting: Guidelines for Data Collection and Reporting
Code of Ethics for Public Officers
Gap Analysis (2011)

**EVALUATION DOCUMENTS AND TEMPLATES:**

- [Gender-Responsive Evaluations in the Work of UNODC \(2018\)](#)
- [UNODC Gender Guidance for Project Managers and Evaluators](#)
- [IES Guidance for inclusive evaluations](#)
- [UNODC Toolkit for Evaluating Interventions on Preventing and Countering Crime and Terrorism](#)
- [UNODC Toolkit for Evaluating Interventions on Anti-Corruption](#)
- [UNEG: Integrating human rights and gender equality in evaluations](#)
- [UNEG Norms and Standards for Evaluation \(2016\)](#)

**LIST OF CORE LEARNING PARTNERS**

Type	Organisation	Name	Designation	Location	Email
UNODC	IES		Chief & Deputy Chief, IES	Vienna, Austria	
Evaluation Manager	GSS	Prof. Samuel K. Annim	Government Statistician	Accra, Ghana	
Lead implementing institution	CHRAJ	Mr. Richard Quayson	Deputy Commissioner & Vice Chair of HiLIC	Accra, Ghana	
Implementing partner	HiLIC		HiLIC Members	Accra, Ghana	

**Note:** The list of stakeholders will be further refined by the evaluation team, in consultation with the evaluation manager in coordination with CHRAJ and IES. The evaluation team may also request interviews with other additional, relevant stakeholders.

**LIST OF NON- CORE LEARNING PARTNERS STAKEHOLDERS**

Type	Organisation	Name	Designation	Location	Email	Comments
Executive						
Parliament						
Judiciary						
Anti-Corruption and Law Enforcement Agencies/Key Accountability Institutions						
Ministries, Departments and Agencies (MDAs), Metropolitan, Municipal and District Assemblies (MMDAs), and Other Public Sector Institutions (OPSIs)						
Independent Governance Institutions						
State Interest and Governance Authority (SIGA) and State-Owned Enterprises (SOEs)						
Financial Sector Institutions						
Private Sector						
Media/Civil Society Organisations (CSOs)						
Traditional Authorities/Religious Bodies/Faith-Based Organisations						
Political Parties						
Development Partners						
Academia						
Citizenry						
Labour Unions						
Implementing Institutions						

## ANNEX II: EVALUATION MATRIX

To guide the evaluation, the following seven evaluation criteria and their respective questions were used:

### RELEVANCE

1. To what extent has NACAP been relevant to stakeholders' needs and priorities?
2. How do stakeholders perceive the relevance of NACAP in reducing or combating corruption in Ghana?
3. To what extent was NACAP designed in a result-oriented, inclusive and participatory manner?
4. To what extent are the outcomes, outputs and activities of NACAP relevant to achieving its objectives?

### EFFICIENCY

1. To what extent has NACAP efficiently delivered regarding the implementation strategies and use of resources (e.g., education and capacity-building materials, funds)?
2. To what extent are the strategies and activities of NACAP cost-effective and timely implemented/delivered to meet expected standards?

### COHERENCE

1. To what extent were the objectives, strategies and activities of NACAP compatible with national, regional and international priorities and policies?
2. How has the alignment or contradiction of NACAP with other policies facilitated or prevented the implementation and achievement of the objectives of NACAP?
3. What opportunities for collaboration have been utilised during the implementation of NACAP?

### EFFECTIVENESS

1. To what extent has NACAP achieved its objectives, outputs and outcomes?
2. What, if any, unintended results can be attributed to NACAP?
3. What are the facilitating or hindering factors for achieving the objectives of NACAP?
4. What strategies or activities have been the most effective in achieving the objectives and outcomes of NACAP?
5. How have the roles and responsibilities of stakeholders contributed to reducing or combating corruption in Ghana?

### IMPACT

1. How has NACAP led to relevant social changes?
2. To what extent has NACAP generated significant positive or negative, intended or unintended, higher-level effects/impacts?

3. How has NACAP impacted the perceptions, experiences, beliefs, attitudes and practices of corruption in Ghana?

## SUSTAINABILITY

1. To what extent has stakeholder ownership and buy-in been achieved in local, national and regional settings?
2. How will the key results and outcomes/changes achieved by NACAP continue after its implementation?
3. What mechanisms or structures have been put in place to sustain the key outputs and outcomes of NACAP, and how likely will the mechanisms and structures continue to function after NACAP?

## HUMAN RIGHTS, GENDER EQUALITY, DISABILITY INCLUSION AND LEAVING NO ONE BEHIND

1. To what extent has the NACAP design and implementation fully considered human rights, gender equality and vulnerable/marginalised groups, including women, children, persons with disabilities and the poor?
2. What gender and inclusion-sensitive approaches were adopted by NACAP?

## ANNEX III: EVALUATION TOOLS: QUESTIONNAIRE AND INTERVIEW GUIDES

### EVALUATION OF THE NATIONAL ANTI-CORRUPTION ACTION PLAN (NACAP) 2015-2024

#### Questionnaire for the General Public (Citizen Science)

##### Section A: Background information

1. Region.....
2. District .....
3. Sex
  - a. Male
  - b. Female
  - c. Prefer not to mention
4. Age
  - a. 35 years or less
  - b. More than 35 years
5. What is your marital status?
  1. Single
  2. Married
  3. Divorced
  4. Cohabiting
  5. Other (Please specify) .....
  6. Not applicable (for children below 18 years)
6. Level of Education
  1. No formal education
  2. Primary
  3. JHS/JSS/MSLC
  4. Secondary/SHS/VOTEC/NVTI
  5. Tertiary
  6. Post-graduate
  7. Professional
  8. Other (Please specify) .....
7. Occupation
  1. Public servant
  2. Civil servant
  3. Academic institution
  4. Private sector
  5. Student

6. Unemployed
  7. Self-employed (agriculture)
  8. Self-employed (non-agriculture)
  9. Other (Please specify)
8. What is your religious affiliation?
1. Christian
  2. Muslim
  3. Traditionalist
  4. Atheist
  5. Other (Please Specify) .....
  6. Prefer not to say
9. Do you have any disability? [Tick all that apply]
1. None
  2. Yes, Visually impaired
  3. Yes, Physically challenged
  4. Yes, Hearing impairment
  5. Yes, Speech impairment
  6. Other disabilities (Specify)
  7. Prefer not to mention

**Section B: Knowledge of NACAP**

10. Have you heard about the National Anti-Corruption Action Plan (NACAP)?
- a. Yes
  - b. No
11. If yes, how did you hear about NACAP?
- a. Circular from my organisation
  - b. Radio
  - c. Television
  - d. Newspapers
  - e. Social Media
  - f. Friends/family
  - g. Other (specify).....
  - h. Not applicable (Only for those said No in question 10)
12. What is your level of knowledge about the activities of NACAP?
- a. High
  - b. Average
  - c. Low
  - d. Don't know
13. Are you personally involved in any activities on fighting or preventing corruption in Ghana?
- a. Yes
  - b. No (If No, skip Question 14).
14. If yes, mention those activities.....

15. To what extent has the NACAP/ or the national anticorruption initiative responded to the needs and priorities as a citizen of Ghana?
- Large extent
  - Somewhat
  - Low extent
  - Don't know
16. Do you think citizens of Ghana are now more aware of the dangers of corruption?
- Yes
  - No
  - Don't know
17. Do you think that institutions of Ghana have improved their efforts to prevent and fight corruption?
- Yes
  - No
  - Don't know
18. To what extent do you think there are enough resources dedicated to fight corruption?
- Large extent
  - Somewhat
  - Low extent
  - Don't know
19. To what extent do you think resources to fight corruption are efficiently managed?
- Large extent
  - Somewhat
  - Low extent
  - Don't know
20. What is your level of awareness of **how to report** corrupt practices in Ghana?
- High
  - Moderate
  - Low
  - Don't know
21. What is your level of awareness of **where to report** corrupt practices in Ghana?
- Large extent
  - Somewhat
  - Low extent
  - Don't know
22. Do you feel **empowered to report** corrupt practices?
- Large extent
  - Somewhat
  - Low extent
  - Don't know
23. Do you **feel safe** to report corrupt practices?
- Large extent
  - Somewhat
  - Low extent
  - Don't know

24. Over the past 10 years, how will you describe corruption in Ghana?

- a. Increased
- b. Remained the same
- c. Decreased
- d. Don't know

25. In the next 10 years, what is your expectation of corruption in Ghana

- a. Increase
- b. Remain the same
- c. Decrease
- d. Don't know

26. How important is it for you to prevent and/or fight corruption?

- a. Very important
- b. Important
- c. Somewhat important
- d. Not important
- e. Indifferent

27. In your view, do you think that more needs to be done to prevent and/or fight corruption in Ghana

- a. Yes
- b. No
- c. Don't know

28. If yes to Question 27, what else can be done to prevent corrupt practices in Ghana? (List as many as possible) .....

29. If yes to Question 27, what else can be done to fight corrupt practices in Ghana? (List as many as possible) .....



EVALUATION OF THE NATIONAL ANTI-CORRUPTION ACTION PLAN (NACAP) 2015-2024

**Interview Guide for Anti-Corruption Agencies (ACAs)/Key Accountability Institutions (KAIs)**

1. Office of the Attorney General and Ministry of Justice
2. Office of the Special Prosecutor (OSP)
3. Ghana Audit Service
4. Economic and Organised Crime Office (EOCO)
5. Commission for Human Rights and Administrative Justice (CHRAJ)
6. Director of Public Prosecutions
7. Auditor-General's Department
8. Public Interest and Accountability Committee (PIAC)
9. Financial Intelligence Centre (FIC)
10. Financial Intelligence Unit
11. Ghana Police Service (GPS)
12. National Investigations Bureau (NIB)
13. Narcotics Control Commission
14. Ghana Armed Forces
15. Ghana Immigration Service
16. Ghana Revenue Authority

**Section A: Background information**

1. Name of institution

**Section B: Knowledge of NACAP**

1. What is your organisation's level of involvement in the activities of NACAP?
  - a. What specific activities has your organisation engaged in towards the implementation of NACAP?

**Section C: Relevance of NACAP**

1. To what extent has the NACAP been relevant to your organisation's needs and priorities?
2. To what extent was the NACAP designed in a results-oriented, inclusive and participatory manner?
3. To what extent has NACAP been relevant to fulfilling your organisational mandate? Can you provide some examples? Can you identify any gaps?

**Section D: Coherence of NACAP**

1. How well does NACAP fit into the objectives or activities of your organisation?
2. To what extent has your institution worked in a coordinated way with other agencies with an anti-corruption mandate to implement the NACAP? Have there been any notable challenges or successes in the coordination efforts?

### **Section E: Efficiency of NACAP**

1. To what extent have the financial and human resources of NACAP been converted into outputs (results) in a timely and cost-effective manner? Can you identify any challenges?
2. Is the budget of your organisation sufficient to achieve NACAP results? Explain your answer.

### **Section F: Effectiveness of NACAP**

1. To what extent did the NACAP achieve its intended objectives?

OBJECTIVE 1: Build capacity to condemn and fight corruption practices (promote and mainstream values of integrity, transparency and accountability)

OBJECTIVE 2: Institutionalise transparency and accountability in public, private and not-for-profit sectors

OBJECTIVE 4: Conduct effective investigations and prosecution of corrupt behaviour (effective enforcement of anti-corruption laws)

2. What factors facilitated or hindered the achievement of results? Can you provide some examples?

### **Section G: Impact of NACAP**

1. To what extent have the activities of NACAP led to the creation of awareness among public officials, the private sector and the general public on the dangers of corruption (strengthened partnerships across sectors)? Probe for each category
2. To what extent have the activities of NACAP improved institutional and legal capacity to fight corruption? Probe for examples
3. To what extent have the activities of NACAP improved coordination among anti-corruption agencies? Probe for examples
4. Overall, what difference has NACAP made? Can you provide some specific/narrative examples?
5. Beyond the activities of NACAP, what has your organisation done to fight corruption in Ghana?

### **Section H: Sustainability of NACAP**

1. To what extent are the results gained from the NACAP in terms of institutional capacity and coordination likely to continue?
2. What are the main factors that will ensure the sustainability of NACAP? Are there any challenges that can prevent sustainability?
3. How can your organisation's activities in the fight against corruption be sustained?

### **Section I: Human rights, gender equality, disability inclusion and leaving no one behind**

1. To what extent has NACAP programme design and implementation been inclusive (in terms of gender and marginalised groups, including people with disabilities) and human rights? Can you provide some examples? What gaps can you identify?

- Gender balance in activities (male and female beneficiaries)
- Inclusion and identification of needs of people with disabilities and marginalised communities
- Gender balance in leadership positions (female leaders)

- Is there a consideration of gender equality and disability aspects in designing anti-corruption strategies?

**Section J: Lessons learned**

1. What lessons can be learned in implementing the NACAP?
2. What emerging best practices could inform future programming for fighting corruption in Ghana?

## ANNEX IV: DESK REVIEW LIST

### Desk Review Documents:

- NACAP (2015-2024) Document
- NACAP Gap Analysis (2011)
- NACAP Annual Progress Reports (2015-2022)
- GSS, CHRAJ & UNODC Ghana Corruption Survey Report (2022)
- NACAP 2022 Monitoring and Evaluation Framework for Data Collection and Reporting: Guidelines for Data Collection and Reporting
- UNODC Ghana Country Report (Executive Summary – 2nd Cycle Review)
- Report on Accessing the Right to Vote and the Conduct of the 2020 Presidential and Parliamentary Elections in Ghana
- Relevant data from GSS, media reporting, etc.
- Azeem, V. A. (2023). Corruption in Ghana: The Musings of a Village Boy
- Hollard et al. (2009)
- ITAD (2011)

