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| **FINANCIAL SECTOR (FS)** |

**NATIONAL ANTI-CORRUPTION ACTION PLAN**

**2024 MONITORING AND EVALUATION FRAMEWORK FOR DATA COLLECTION AND REPORTING**

**GUIDELINES FOR DATA COLLECTION AND REPORTING**

**1.0. INTRODUCTION**

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

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

* All heads of institutions and leadership at all levels should take responsibility for their areas of oversight and ensure that measures are taken to combat corruption in their institutions, including implementation of roles specifically assigned to their institutions under NACAP;
* The Ministry of Finance should ensure that MDAs, MMDAs and all public sector institutions budget for the implementation of specific programmes assigned to them under NACAP, and
* Ministers, Chief Executives and Heads of Public sector institutions shall submit reports on the implementation of NACAP to the Monitoring and Evaluation Committee (MONICOM) at the CHRAJ, with copies to the Office of the President.

To assist in the assessment of the outputs or outcomes of the implementation of planned activities and generally assess the progress of implementation of NACAP in 2024, indicators have been developed under general roles and the four strategic objectives of NACAP.

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

**2.0. ROLES UNDER NACAP**

**2.1 General Roles**

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

**2.2 Roles under Strategic Objectives**

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

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

**3.0. THE 2024 MONITORING AND EVALUATION FRAMEWORK FOR DATA COLLECTION AND REPORTING**

The 2024 NACAP M&E Data Collection and Reporting Framework is presented in the form of a matrix as follows:

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

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

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

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

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

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

**4.0 Clustering of Implementing Partners**

Implementing Partners are clustered/grouped into the following:

| **CLUSTER/CATEGORY OF INSTITUTION** | **COMPOSITION** |
| --- | --- |
| Office of the President (OoP) | Office of the President and its Agencies |
| Parliament | Parliament |
| Judicial Service (JS) | Judicial Service |
| Commission on Human Rights and Administrative Justice (CHRAJ) | CHRAJ |
| Anti-Corruption Agencies (ACAs)/Key Accountability Institutions (KAIs) | Office of the Attorney General and Ministry of Justice Office of the Special Prosecutor National Intelligence Bureau Ghana Police Service and Other Security Agencies Narcotics Control Commission Internal Audit Agency Ghana Audit Service Economic and Organised Crime Office |
| Ministries and Civil Service | Office of the Head of Civil Service (OHCS), Ministries and the Civil Service |
| Department, Agencies (DAs) and Other Public Sector Institutions (OPSIs) | Department, Agencies and Other Public Sector Institutions including the: Electoral Commission (EC) Ghana Revenue Authority (GRA) National Commission for Civic Education (NCCE) National Development Planning Commission (NDPC) |
| Metropolitan, Municipal and District Assemblies (MMDAs) | Office of the Head of Local Government Service (OHLS) as well as RCCs and MMDAs |
| Financial Sector | Bank of Ghana, Banks, Savings and Loans |
| Pension and Insurance Institutions | National Pensions Regulatory Authority National Insurance Commission Social Security and National Insurance Trust All other Pension and Insurance institutions |
| State Interests and Governance Authority (SIGA) and State-Owned Enterprises (SOEs) | State Interests and Governance Authority (SIGA) All State Owned Enterprises |
| Civil Society Organisations (CSOs) | All Civil Society and Non-Governmental Organisations |
| Faith Based Organisations (FBOs) | Catholic Bishops Conference The Ghana Pentecostal and Charismatic Council, The National Charismatic and Christian Churches The Christian Council of Ghana The Council of Independent Churches Ghana Muslim Mission Ahmadiyya Muslim Mission Ghana All other religious bodies |
| Private Sector (PS) | Private Enterprise Federation All Private Organisations |
| Political Parties (PPs) | All Political Parties |
| Traditional Authorities | Ministry of Chieftaincy and Religious Affairs National House of Chiefs Centre for National Culture |
| Tertiary and Educational Institutions | Basic Schools, Second Cycle Schools and Tertiary Schools |
| Media | National Media Commission, Radio and Television stations |

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

For further enquiries, contact the following persons:

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**NACAP 2024 MONITORING AND EVALUATION FRAMEWORK FOR DATA COLLECTION AND REPORTING**

**INSTRUCTIONS FOR USE**

1. All Implementing Partners are to use the NACAP Reporting Template for reporting within the time frame.
2. Access the reporting tool through any of the following websites:

* [www.chraj.gov.gh](http://www.chraj.gov.gh)
* <https://nacap.chraj.gov.gh>

1. All indicators are for NACAP activities implemented in 2024.
2. Implementing Partners should complete the indicator (provide results/status of implementation) and Data Source (Means of Verification) sections.

**GENERAL ROLES (ACTIVITIES) OF IMPLEMENTING PARTNERS**

| **Broad Activity** | **Indicator** | **Result (Status of Implementation)** | **Data Source (Means of Verification)** |
| --- | --- | --- | --- |
| Budget for implementation of NACAP activities | Amount budgeted for implementation of NACAP activities |  |  |
| Actual expenditure for implementing NACAP activities |  |  |
| Designate Schedule Officer(s) (Focal Person) for NACAP | Name(s), designation(s), email(s) and phone number(s) of Focal Person(s) |  |  |
| Sensitize staff on NACAP and SDG 16 (SDG Target 16.5 and 16.6)  Note:  SDG 16.5: Substantially reduce corruption and bribery in all their forms.  SDG 16.6: Develop effective, accountable and transparent institutions at all levels. | Number of staff sensitized on NACAP and SDG 16 |  |  |
| Strengthen internal control measures to reduce opportunities for corruption within public, private and not-for-profit sector  organizations/institutions | Number of Internal Audit reports (indicate date of submission)  Number of Audit Committee Meetings (indicate date of meetings) |  |  |
|
| Establish safe and confidential reporting systems/mechanisms at the work place (e.g. complaint boxes, hotlines and web-based platforms) | Safe and confidential reporting systems/mechanisms at the work place established  (Indicate mechanism in place) |  |  |
| Act expeditiously on reports of corruption and misconduct in the work place. | Number of corruption (e.g. fraud, bribery, misappropriation, embezzlement etc.) complaints received |  |  |
| Number of complaints on workplace misconduct (e.g. persistent lateness, absenteeism, sexual harassment, etc.) received |  |  |
| Number of investigations on acts of corruption |  |  |
| Number of actions undertaken on workplace misconduct |  |  |
| Number of prosecutions/ sanctions on acts of corruption |  |  |
| Number of sanctions on workplace misconduct |  |  |
| Develop and publicize sexual harassment policies at the work place | Sexual harassment policy at the work place (indicate whether the policy is in place) |  |  |
| Number of awareness programmes on Sexual harassment policy organised for staff |  |  |
| Publication of Sexual harassment policy (on websites, at vantage points of the offices, notice boards, etc.) |  |  |
| Introduce measures to control absenteeism, lateness and moonlighting | Measures to check absenteeism, lateness (e.g. clock in device, attendance book etc) |  |  |
| Measures to check moonlighting |  |  |

**STRATEGIC OBJECTIVE 1**

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

| **NACAP Ref/ Broad Activity** | **Indicator** | **Results**  **(Status of Implementation)** | **Data Source (Means of Verification)** |
| --- | --- | --- | --- |
|
| **2.** Organize Regular Public Education and Awareness Programmes on the Evils of Corruption and the Ethos of Anti-Corruption in the General Public and Private Sector Organizations **(Financial Institutions)** | Number of public education and awareness programme on the evils of corruption and the ethos of anti-corruption |  |  |
| Number of beneficiaries |
| **3.** Create Public Fora/Community Outreach/Clinics at District Level | Number of community outreach/clinics/public fora organised |  |  |
| Number of beneficiaries |
| **5.** Mainstream Anti-Corruption, Ethics and Integrity in Public and Private Sector (**Financial Institutions)** | Measures or activities introduced to mainstream Anti-corruption, ethics and integrity issues |  |  |
| **10.** Organize Awareness Raising Programmes on the Negative Impact of Money Laundering and Financing of Terrorism on Sustainable Development and Security for the General Public | Number of awareness raising programmes organised |  |  |
| **11.** Conduct Assessment of Institutions/ Agencies on the Integration of Corruption Prevention Measures in their Work Programmes | Number of institution/agencies assessed on the integration of corruption prevention in their work programmes |  |  |
| **14.** Enforce the Public Financial Management Legislation | Budget developed and implemented |  |  |
| Proper procurement and contracting practices adopted |
| Periodic accounting and financial reporting undertaken |
| Number of activities of Audit Committees and internal audit reports submitted |
| External audit recommendations and management letter implemented |
| **17.** Establish an Ethics Development Centre | Ethics development centre established (provide details) |  |  |
| **20.** Strengthen Anti-Corruption Capacity at District and Regional Levels and Encourage Whistleblowing | Measures/actions taken to strengthen anti-corruption capacity at district and regional levels |  |  |

**STRATEGIC OBJECTIVE 2**

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

| **NACAP Ref/Broad Activity** | **Indicator** | **Results (Status of Implementation)** | **Data Source (Means of Verification)** |
| --- | --- | --- | --- |
|
| 1. Conduct System Examination of Corruption-Prone Public and Private (**Financial)** Institutions to Identify and Plug Loopholes | System examinations conducted in a number of financial institutions (provide details) |  |  |
| **2.** Monitor Implementation of System Examination Reports and Recommendation | System examination recommendation implemented |  |  |
| **10.** Develop and Implement Customer Service Charters in All Public and Private Sector Institutions (**Financial Institutions**) | Customer Service Charters developed (indicate whether the charter is in place) |  |  |
| Actions taken towards implementation of customer service charter |
| **11.** Ensure that Financial Institutions Prepare Financial Statements on Time for Audit | Measures/actions taken to ensure financial statements of financial institutions are prepared on time for audit |  |  |
| **18.** Enforce and Monitor Compliance with the Codes of Conduct /Ethics | Measures taken to enforce and monitor compliance with the codes of conduct /ethics |  |  |
| **21.** Create and Operationalise Integrity Committees/Ethics Committees within State Institutions (**Financial Institutions**) | Measure taken to create and operationalise Integrity/Ethics Committees |  |  |
| **25.** Enforce Conflict of Interest Rules and Educate Public Officers on Conflict of Interest | Measures taken to enforce Conflict of interest rules |  |  |
| Number of public officers educated on conflict of interest |
| **26.** Request Public Officers (Key Officers in the Industry) to Disclose Personal Interests, e.g. Affiliations, Upon Taking up Appointment | Number of officers disclosing personal interest |  |  |
| **30.** Create Civic Awareness to Enable the Public to Demand Accountability from the Financial Sector Officials | Number of awareness programmes organised |  |  |
| Number of beneficiaries |

**STRATEGIC OBJECTIVE 3**

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

| **Ref/Broad Activity** | **Indicator** | **Results / Status of Implementation** | **Data Source (Means of Verification)** |
| --- | --- | --- | --- |
|
| 4. Develop Whistle Blowing and other Reporting Mechanism (e.g. Hotlines, Toll Free and Other Digital Platform) | Whistleblowing and other reporting mechanisms developed (list reporting mechanisms in-place, including Whistle blowing) |  |  |
| **5.** Undertake Awareness-Raising Programmes for the Public(Whistle Blowing and others) | Number of awareness raising programmes organised |  |  |
| Number of beneficiaries |  |

**STRATEGIC OBJECTIVE 4**

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

| **Ref/Broad Activity** | **Indicator** | **Result (Status of Implementation)** | **Data Source (Means of Verification** |
| --- | --- | --- | --- |
|
| **5.** Enforce the Implementation of the Financial Management Act and Regulations | Financial Management laws and regulations enforced |  |  |
| 7. Provide and Furnish Office Accommodation for Anti-Corruption Agencies | Office accommodation provided and furnished |  |  |
| 9. Build Capacity of the EOCO And **FIC t**o Undertake Intelligence Gathering Work | Capacity of EOCO and **FIC** built |  |  |
| 11. Train Officers of The **FIC**/EOCO and Law Enforcement Agencies in Basic Investigation Techniques, Basic Drug Enforcement, Basic Intelligence, Asset Tracing, and Money Laundering | Number of officers trained in basic investigations, techniques and drug law among others |  |  |
| **25.** Build Capacity of **FIC a**nd **Bank of Ghana** Institutions in Asset Tracing and Recovery | Measures taken to build capacity of AC institutions in asset tracing and recovery built |  |  |
| **32.** Organise Study Sessions on the Vulnerability to Money Laundering and Terrorism Financing | Number of study sessions organised |  |  |