

GHANA

GHANA'S NATIONAL ANTI-CORRUPTION STRATEGY

EXECUTIVE SUMMARY

The Ghana Matrix has been developed against the background of a return to constitutional rule, continuous progress in consolidating democratic governance, growing official and civil society recognition of the dangers of corruption, and the need to curb it.

Other auspicious developments include the formal expressions of commitment to uproot indiscipline in our national life in the Presidential Sessional Addresses and other speeches, as well as the creation of the Serious Fraud office to deal with complex fraud, and reinventing government under the National Institutional Renewal Program (NIRP).

The Matrix was developed by representatives from state institutions and non-governmental organisations in collaboration with the World Bank. It is based on a number of assumptions. First, that corruption is endemic in Ghanaian society and is a serious impediment to economic and social development. Second, previous attempts at curbing this canker have failed because they failed to identify and address the underlying causes of the problem, the anti-corruption crusade was not participatory and the emphasis was solely on law enforcement by the use of draconian anti-corruption laws and stiff penalties.

The Matrix identifies the problem areas in fighting corruption, the steps, if any, that have already been taken to address these problems, and the steps that need to be taken in the short, medium and long term. The programme also assesses a time frame for implementation of the program and the expected results.

Some of the greatest obstacles to curbing corruption include the following: weak political will; mixed signals from the Executive Branch; weak institutions, and inadequate adherence to the rule of law; entrenched patronage; weak private sector; weak civil society, and pervasive cynicism.

Weak Political Will/ Mixed Signals from Executive Branch: The Matrix observes that executive commitment to combat corruption was expressed in the last two Presidential Sessional Addresses to the nation. However, the rhetoric has yet to be translated into concrete action. The matrix also recognises weak official commitment to combating corruption is partly a function of low political efficacy and apathy on the part of citizens.

Weak Institutions/Weak culture of rule of law: The Matrix also observes that government institutions need to be strengthened. In this regard, the Ghana Team notes the existence of government managed institutional and legal reform programs as well as an Annual Governance Forum of the National Institutional Renewal Program. The Team has identified the need to give the National Institutional Renewal Program—which is aimed at reinventing Government an anti-corruption focus, including the establishment of ethics desks or whistle blower units in all public institutions for dealing with cases of conflict of interest and bribery.

The matrix identifies poor financial management as one of the problem areas. Government needs to be more transparent in the use of resources including foreign loans, grants, tax revenue etc. There is the need for stronger parliamentary oversight of

government expenditure through the Public Accounts Committee. The Auditor General should be better equipped to enforce sanctions for financial misbehaviour. The Government has developed a Medium Term Expenditure Framework to address some of these problems, but this has yet to make an impact.

On the whole, levels of accountability and transparency remain very low in national and sub-national administration. Thus, the planned programs focus on greater access to information, which includes the passage of a Freedom of Information Act and Whistleblowers Act, and the repeal of criminal libel and sedition laws. Greater participation of the public in the work of anti-corruption agencies and in national and local governance processes is also advocated.

Weak civil society/pervasive cynicism/entrenched patronage: The Ghana Team observes that NGOs, CSOs and citizen pressure groups are in a fledgling state. There is inadequate co-operation among them and their institutional management capacity is weak. The Matrix, therefore, advocates the development of the capacity of credible corruption fighting civic bodies. An umbrella organisation to oversee the implementation of the national anti-corruption program is desirable. It will also be useful to have a central body such as CHRAJ to co-ordinate international, domestic and civil society anti-corruption efforts. The civil society-based anti-corruption groups need to have a vanguard body.

The present diagnostic and participatory approach initiated by the World Bank is useful and commendable. Indeed, in developing countries where corruption is systemic, only a systemic approach to the problem would yield positive results. The establishment of a broad-based coalition to curb the problem is a fundamental necessity.

However, the success of this World Bank initiative would depend on the Bank's willingness to give technical and logistic support to oversight and Ombudsman institutions in African countries, which are going to be in the forefront of implementing the matrix. In addition, the World Bank must use its influence to secure greater commitment from Governments to the program, in countries where lack of political will has been identified as a problem.

PRIORITY PROGRAMS

Intensive public awareness campaign to begin in November, 1999 with the launching of the postal campaign in December 1999 ahead of the National Integrity Workshop and a formal launching of the Ghana Integrity Initiative (GII) in February 2000.

Perceptions of corruption in the delivery of key services—education, health and land—have been conducted in October 1998 and August 1999 by the Center for Democracy and Development (CDD).

More of such surveys will be conducted for areas such as customs, immigration etc. throughout 2000.

The OECD anti-bribery Convention will be highlighted as part of the proposed awareness campaign. It will be also used to generate interest in anti-corruption work among the private sector.

Building a broad national coalition for combating corruption:

Action already began in mid-May to late 1998 with the formation of an ad hoc planning group for the national integrity workshop of October that year. The ad hoc planning group

comprised representatives from the Executive Branch/Attorney Generals office, civil society under the auspices of the Commission on Human Rights and Administrative Justice (CHRAJ); the formation of a civil society based chapter of Transparency International (TI) the GII in 1999 and the formation of the nucleus of an anti-corruption Ghana Team comprising CHRAJ, Serious Fraud Office (SFO), Institute of Economic Affairs (IEA), since 1999.

Generating effective demand for official action to combat corruption in particular by initiating dialogue between national anti-corruption coalition and the Executive Branch and Parliament in November 1999. The ad-hoc planning group had met and presented the report of the October 1998 national integrity workshop to the Vice President.

Actions to promote official transparency will include intensifying the campaign for access to information/Freedom of Information Act as well as the repeal of the Criminal Libel and Seditious laws. Actions already taken on this include IEA round tables where the issue has been extensively analysed and canvassed. The intensified campaign will be conducted throughout the year 2000.

Pushing for better provisioning and resource for CHRAJ and other official anti-corruption agencies; power for CHRAJ to prosecute for corruption by the end of 2000.

Increased media freedoms and access to information

Implementation Responsibilities

Responsibility for implementation of the programme will be shared between CHRAJ, SFO, GII, IEA, CDD, National Institutional Renewal Programs (NIRP), and religious bodies,

National Media Commission (NMC), Ghana Journalists Association (GJA) and the Parliament of Ghana.

CHRAJ will lead the central coordinating coalition.

IEA will lead the round table discussions to highlight legislative reform especially the passage of Freedom of Information Act and Official Secrets Act.

CDD survey capacity should be strengthened

GII should be empowered in public awareness campaigns.

SFO should be directly involved in the legislative processes together with IEA.

Ghana Journalists Association and National Media Commission would co-ordinate actions to push for repeal of criminal libel and seditious laws, promote media freedoms and access to information.

FINANCIAL REQUIREMENTS AND SUPPORT

Logistics for CDD Service Delivery and Corruption perception Surveys (Budget to be provided later, contact E Gyimah-Boadi)

Logistics for launching of Ghana Integrity Initiative (GII), (Contact Yaw Asamoah)

Logistics for CHRAJ led coalition building (Emil Short for budget)

Logistics for IEA round table discussions (Contact George Appenteng and Alhaji Abdullai for budget)

Logistics for intensive public awareness campaigns—TV, radio and poster competition (Contact Yaw Asamoah for budget)

Logistics for key statutory and civil society bodies involved in the program (Budget to be submitted as and when requested)

COUNTRY TEAM EFFORT AT BUILDING POLITICAL SUPPORT

There was conscious effort to compose an ad-hoc national planning group for the national integrity workshop, which covered all the main institutions of state and civil society. The Minister of Interior and Vice President were keynote speakers at the workshop and the Minister of Local Government played a key liaison role between Government and CHRAJ in planning it. A formal endorsement from the President is being actively pursued.

GII itself comprises CHRAJ, Private Enterprises Foundation (PEF), religious bodies both Christian and Muslim, the media, academics, and opinion leaders.

The Governing Board includes Mr. Emil Short (head of CHRAJ), Dr SKB Asante (former head of UN Center for Transnational Corporations), Bishop Palmer Buckle, (Catholic Bishop of Koforidua), Dr. Angela Ofori Atta (Ghana Medical School), Audrey Gadzekpo (School of Communication Studies, Legon), Prof. Araba Apt (Center for Social Policy Studies), Prof. Eyimah-Boadi(Center for Democracy and Development), Yaw Asamoah (Legal Practitioner), Mauvi Wahab (Head of the Ahmadiyya Muslim Mission).

The Ghana team will consult with the donor community under the auspices of the World Bank.

DRAFT FOR DISCUSSION**GHANA'S NATIONAL INTEGRITY STRATEGY**

GHANA: Prioritising Problem Areas							
Problem	Who benefits from the problem?	Who loses?	Actions already taken	Actions to take			Expected results and by when?
				<i>Government</i>	<i>Civil Society</i>	<i>Team</i>	
Cynicism and lack of confidence in law enforcement agencies/ authorities	<ul style="list-style-type: none"> • Law enforcement agencies • Political leaders 	<ul style="list-style-type: none"> • The people • Individuals • Businesses • Institutions • Good governance 		<ul style="list-style-type: none"> • To enforce disciplinary measures within law enforcement agencies & gov't itself 	<ul style="list-style-type: none"> • To insist on their rights & compliance with rule of law 	<ul style="list-style-type: none"> • Sensitise civil society and gov't of danger of non-compliance with rule of law 	Promotion of good governance, confidence in investor climate, greater political stability & respect of rule of law & promotion of economic development
Authorities act as if they are above the law. Because of weak system they are not brought before the law	<ul style="list-style-type: none"> • Political leaders • Heads of ministries, • Gov't departments • Their cronies 	<ul style="list-style-type: none"> • The people • Good governance • The economy • New investments 	Involvement of grass-roots in governance e.g. Unit Committees and District Assemblies given role in governance	<ul style="list-style-type: none"> • Gov't official to comply with rule of law and gov't to become more transparent 	<ul style="list-style-type: none"> • Should demand greater transparency & regular interaction with political leaders 	<ul style="list-style-type: none"> • To continue to advocate greater participation of civil society in gov't 	Stable democracy good governance more transparency, accountability & economic development
Weak judiciary though independent they cannot or are unwilling to enforce their independence	<ul style="list-style-type: none"> • Criminals • Judges • Judicial service workers • Police • Politicians 	<ul style="list-style-type: none"> • Society, the people • The economy • Investors • The sub-region 	Establishment of community & reg'l tribunals to bring justice to the doorstep of the people. Constitution guarantees	<ul style="list-style-type: none"> • To provide resources to improve on adjudication procedures, computers. • To improve on salaries of judges & judicial staff 	<ul style="list-style-type: none"> • To insist on transparency in appointment of judges and insist on amendment of obnoxious laws e.g. criminal, libellous, freedom of information 	<ul style="list-style-type: none"> • Co-ordination of media and civil society actions. • Provide fora for action on issues 	Confidence and judicial process rule of law

GHANA: Prioritising Problem Areas							
<i>Problem</i>	<i>Who benefits from the problem?</i>	<i>Who loses?</i>	<i>Actions already taken</i>	<i>Actions to take</i>			<i>Expected results and by when?</i>
				<i>Government</i>	<i>Civil Society</i>	<i>Team</i>	
Financial Management							
Decentralisation of financial resources without capacity at local levels	<ul style="list-style-type: none"> Executive Local and public officials Local gov't elites 	<ul style="list-style-type: none"> Society The people, generally 		<ul style="list-style-type: none"> Train man power Improve conditions of service to attract qualified personnel to go to rural areas 	<ul style="list-style-type: none"> Insist on qualified public servants to be sent to rural ares Demand greater tech'l expertise on part of financial managers 	<ul style="list-style-type: none"> Discuss & educate on need for IFMA with stakeholders, Ministry of Finance and Accountant General 	Minimise dissipation of funds on unproductive ventures Improve allocation of funds for development and reduce corruption
Non-disclosure of adequate info, unreliable and disconnected data	<ul style="list-style-type: none"> Officials and persons connected to ruling elites 	<ul style="list-style-type: none"> Society Development of nation, e.g. education, health etc. 	<ul style="list-style-type: none"> Medium Term Expenditure Framework (MTEF) Block allocations one made by Ministry of Finance for disbursement by ministries and depts. 	<ul style="list-style-type: none"> Gov't to be more transparent Accountant General to be better equipped Treasury Dept. to be [acttealed] 	<ul style="list-style-type: none"> Demand accountability from gov't 	<ul style="list-style-type: none"> Sensitise country to need for planned and informed bridge, transparent auditing, accounting and need for IFMS 	Better income/expenditure control Reduce gov't over-expenditures Make funds available when needed
Executive override in the FMS through Ministry of Finance	<ul style="list-style-type: none"> Political elites Parties Senior public servants Cronies 	<ul style="list-style-type: none"> Population Entire country Service providers 	Parliamentary Oversight Committee through Public Accounts Committee being intensified	<ul style="list-style-type: none"> To be more cooperative and accountable To be more transparent in use of foreign loans, grants, etc. 	<ul style="list-style-type: none"> Demand accountability, transparency and more interaction with Executive 	<ul style="list-style-type: none"> Assist in educating public on Gov't finances, & gov't responsibilities Lectures are already being organised under auspices of IEA 	Proper utilisation of loans and grants Payment of service providers Pay accumulated arrears to contractors, suppliers and workers, etc. for jobs already executed

<i>GHANA: Prioritising Problem Areas</i>							
<i>Problem</i>	<i>Who benefits from the problem?</i>	<i>Who loses?</i>	<i>Actions already taken</i>	<i>Actions to take</i>			<i>Expected results and by when?</i>
				<i>Government</i>	<i>Civil Society</i>	<i>Team</i>	
Role of Central Bank in budget and gen'l accounting	<ul style="list-style-type: none"> Public officials 	<ul style="list-style-type: none"> Nation 	--	<ul style="list-style-type: none"> More transparency & coordination on part of Ministry of Finance and Acct. General, Central Bank 	<ul style="list-style-type: none"> Continued vigilance & whistle-blowing on any wrongdoing 	<ul style="list-style-type: none"> Education of civil society to be intensified 	Improved accounting records & proper tracking of income & expenditure of gov't
Inadequate internal auditing/lack of auditors	<ul style="list-style-type: none"> Officials Consultants Suppliers Contractors 	<ul style="list-style-type: none"> Gov't People 	--	<ul style="list-style-type: none"> Institute intensive training programs for internal auditors & IT specialists 	<ul style="list-style-type: none"> Insist and promote establishment of pre-auditing system 	<ul style="list-style-type: none"> Educate media & business organizations on need for timely internal auditing 	Reduce misappropriation of funds, over/under-invoicing, double payments, & stopping payments for non-service
Weak democratic institutions	<ul style="list-style-type: none"> Individual cronies 	<ul style="list-style-type: none"> Nation Less privileged, particularly 	--	<ul style="list-style-type: none"> Steps to strengthen capacity of institutions & improve working conditions 	<ul style="list-style-type: none"> Involve itself in participatory governance 	<ul style="list-style-type: none"> Train civil society in democratic norms & practices 	Good governance Stable institutions & development

<i>GHANA: Identifying Next Steps</i>			
<i>Problem</i>	<i>Actions already taken</i>	<i>Actions to take</i>	<i>Expected results and by when?</i>
Lack of public awareness		<i>Government and Media:</i> <ul style="list-style-type: none"> Sensitising public on corruption, i.e. TV talk shows (2 in English, 6 discussion programs in each in of 6 languages used on nat'l TV), and radio programs (JOY, GAR, UNIVERSE, CHOICE and GOLD) 	
Media and society		<i>Government, Civil Society and Media:</i> <ul style="list-style-type: none"> Monthly roundtable discussions at the Institute of Economic Affairs 	
Procurement fraud		<i>Government:</i> <ul style="list-style-type: none"> Survey involving questionnaires, interviews of contractors, gov't officials, donor agencies, suppliers, etc. 	
Corruption and inefficiency in service delivery		<i>Government:</i> <ul style="list-style-type: none"> Gen'l household surveys on corruption covering police, judiciary, health, civil service, customs, immigration and education 	
Weak investigative skills in media and law enforcement		<i>Government and Media:</i> <ul style="list-style-type: none"> Capacity building training seminars for media, law enforcement agencies to enhance investigative skills and reporting 	Before Durban
Weak gov't institutions		<i>Government, Civil Society and Media:</i> <ul style="list-style-type: none"> Promotion of good governance involving judiciary, Ghana Bar Association, Parliament, civil society, rule of law, Executive 	<i>Long-term:</i> In collaboration with WB, UNDP, IEA, NIRP, etc.
Lack of coordinated coalitions		<i>Government and Media:</i> <ul style="list-style-type: none"> Anti-corruption coalition group involving CHRAJ, SFO, IEA, Nat'l Integrity Committee, media, etc. 	<i>Short-term:</i> Identification of coalition group members <i>Long-term:</i> On-going support to Anti-corruption activities

GHANA: Identifying Next Steps			
Problem	Actions to take	Resources needed	Expected results and by when?
Political Will			
High-level political will	<i>Team:</i> Fostering political will at high level		July 1999
Education of civil society, gov't officials, President Capacity building	<i>Team:</i> <ul style="list-style-type: none"> Meeting with President J.J. Rawlings Briefing of initiative, what other countries are doing, request for support Using media programs (radio, TV) (e.g. "Talking points," "Public Consent," "Crossfire" George to alert Peter Harrold, WB Country Director to call meeting 	<ul style="list-style-type: none"> NCCE (Lari Bimi) Ministry of Communication (Mr. Sekyiamah) Financing for programs (training & capacity building), transportation, conferences and publications DANIDA (Frederick Ebert), WB, USAID, UNDP, OFID 	<i>On-going</i> Intensified in July 1999 (George to coordinate 1-2 meetings per month)
Procurement			
Anti-corruption not considered in any of the reforms (WB has initiated most of the reforms)	<ul style="list-style-type: none"> Anti-corruption component needs to be added Survey on tendering procedures, bidding, evaluation criteria, contract classification, etc. Meet with officials of Ministries Meet with National Institutional Renewal Program 	<ul style="list-style-type: none"> Financing for surveys (WB, D. Kaufmann) Technical input (WB, R. Reinikka) 	Initiation by Oct. 1999
Social Services			
Police service	<i>Team and Donors:</i> <ul style="list-style-type: none"> Develop survey Look for solutions, behavior, work habits, salaries 	<ul style="list-style-type: none"> Financing for surveys (WB, Kaufmann) Technical input (WB, Reinikka) 	Initiation by Oct. 1999
Courts/Judiciary	<i>Team and Donors:</i> <ul style="list-style-type: none"> Develop survey of courts, Bar Association, judges/staff, behavior, civil society, public 	<ul style="list-style-type: none"> Financing for surveys (WB, Kaufmann) Technical input (WB, Reinikka?) 	Initiation by Oct. 1999
Educational institutions	<i>Team and Donors:</i> <ul style="list-style-type: none"> Coordinate existing study & survey results: broadly defined, admissions, salaries Consider additional survey in Autumn '99 		<i>Sept. 1999</i> Coordinate and decide on additional survey

<i>GHANA: Identifying Next Steps</i>			
<i>Problem</i>	<i>Actions to take</i>	<i>Resources needed</i>	<i>Expected results and by when?</i>
Health sector	<i>Team and Donors:</i> <ul style="list-style-type: none"> • Coordination of study & survey results: procurement, morgues, other areas 		<i>Sept. 1999</i> Coordinate & decide on additional survey
Revenue Collection			
Customs	<i>Team and Donors:</i> <ul style="list-style-type: none"> • Survey from scratch: procedures, documentation, staff supervision, inadequate port facilities, excessively complicated guidelines, discretionary power 	Financing for surveys (WB, D. Kaufmann) Technical input (WB)	Initiate by Oct. 1999
Immigration	<i>Team and Donors:</i> <ul style="list-style-type: none"> • Survey from scratch: passports, birth certificates, death certificates, nationality documents 	Financing for surveys (WB, D. Kaufmann) Technical input (WB)	Initiate by Oct. 1999

GHANA: Strategy Matrix	
<i>Problem</i>	<i>Reform</i>
Trade Policies	
<ul style="list-style-type: none"> • Open economy • CEPS to act as facilitator within context of vision 2020 • CEPS member of World Customs Organisation, member of WTO/GATT • Customs officials are influenced by importers • Complex regulations • Customs officials • Traders/commercial houses/importers/exporters • Security personnel at border posts • Port officials/clearing [agentier] companies 	<p><i>Government and Stakeholders:</i></p> <ul style="list-style-type: none"> • Introduce more transparency • Harmonise customs procedures with global trading partners • Persons who influence Customs officers must be prosecuted • Simplify regulations <p><i>Stakeholders:</i></p> <ul style="list-style-type: none"> • There should be frequent rotating of Customs officials • Physical contact between importers and Customs officials should be kept to barest minimum • Customs Authority should streamline clearing procedures
The Political Executive	
<ul style="list-style-type: none"> • Appointment of top mgmt and Board of Directors by Gov't • Interference of Gov't and politicians to secure preferential exemptions • Assumption that Gov't officials and politicians are [imm fo] Customs laws 	<p><i>Government and Stakeholders:</i></p> <ul style="list-style-type: none"> • Appointments should be based on tech'l competence <p><i>Government:</i></p> <ul style="list-style-type: none"> • Nominations for appointment of top mgmt should be made by President and vetted by Parliament as done for Ministerial appointments <p><i>Government, Stakeholders and Civil Society:</i></p> <ul style="list-style-type: none"> • Develop behavior standards applicable to all and sundry • Reduce political interference in day-to-day work of CEPS
The Legislature	
<ul style="list-style-type: none"> • Customs, Excise and Preventive Service (CEPS) operates under PNDC Law 330 with objective to collect and account for duties, taxes and revenues specified under the law 	<p><i>Government and Stakeholders:</i></p> <ul style="list-style-type: none"> • Certain aspects of the legislation need review by the Attorney-General's Office, CEPS and Parliament • Currently, does not collect Sales Tax due to introduction of VAT (responsibility of VAT Service)

<i>GHANA: Strategy Matrix</i>	
<i>Problem</i>	<i>Reform</i>
National Anti-Corruption Laws and Agencies	
<ul style="list-style-type: none"> • CHRAJ deals and investigates complaints brought to its attention • Serious Fraud Office (SFO) investigates fraud cases and must prosecute when necessary with approval of Attorney-General • NGOs not yet fully developed for anti-corruption 	<p><i>Government:</i></p> <ul style="list-style-type: none"> • Some anti-corruption laws need to be amended • Bribery definition has to be more embracing in the Criminal Code <p><i>Government and Stakeholders:</i></p> <ul style="list-style-type: none"> • CHRAJ laws need to be strengthened <p><i>Stakeholders and Civil Society:</i></p> <ul style="list-style-type: none"> • Anti-corruption agencies such as TI should start working
General Integrity Environment in the Public Sector	
<ul style="list-style-type: none"> • General weakening of moral due to low salaries • General low ethical standards due to low understanding of on-going public sector reforms • Risk of being caught low 	<p><i>Government:</i></p> <ul style="list-style-type: none"> • Attempts presently being made to improve salaries of civil servants • Civil service reform to be speeded up <p><i>Others:</i></p> <ul style="list-style-type: none"> • Senior public servants to be made more accountable through performance contracts
Social Acceptance of Public Sector Corruption	
<ul style="list-style-type: none"> • Society has recently become very tolerant of corruption by public servants and all sectors of the economy 	<p><i>Stakeholders, Civil Society and Others:</i></p> <ul style="list-style-type: none"> • Public education and civic education in schools

<i>GHANA: Strategy Matrix</i>	
<i>Problem</i>	<i>Reform</i>
The Media	
<ul style="list-style-type: none"> • Lack of info on operation of CEPS • Several articles on corruption • Officials refuse to provide info quoting Official Secrets Act • Prosecution of journalists for sensational articles 	<p><i>Stakeholders and Civil Society:</i></p> <ul style="list-style-type: none"> • CEPS should learn to be media friendly <p><i>Stakeholders:</i></p> <ul style="list-style-type: none"> • Journalists must improve on investigative techniques <p><i>Government</i></p> <ul style="list-style-type: none"> • Official Secrets Act needs amendments, freedom of information act necessary <p><i>Government and Others:</i></p> <ul style="list-style-type: none"> • Criminal libel law should be removed from the statutes
Civil Society	
<ul style="list-style-type: none"> • National Commission on Civic Education (NCCE) • Non-formal Education Division (NFED) of Ministry of Education, traditional councils, religious bodies, media involved in public awareness • IEA, CHRAJ and SEO preparing seminars for [gronpers] 	<p><i>Team:</i></p> <ul style="list-style-type: none"> • IEA, CHRAJ and SFO preparing to strengthen anti-corruption alliance group involving civil society (NGOs) and private sector stakeholders
Other Environmental Factors	
<ul style="list-style-type: none"> • 2500 km land border with 500 km sea corridor • Neighboring countries are Franco-phone with different legal systems • Cattle and cash, crop smuggling quite a problem • Diverse ethnic groups along border areas 	<p><i>Government:</i></p> <ul style="list-style-type: none"> • Provide Customs authorities with communications and adequate logistics • Activate Joint-Border Authorities <p><i>Government, Stakeholders and Civil Society:</i></p> <ul style="list-style-type: none"> • Promote peaceful existence among ethnic groups on common border
Leadership	
<ul style="list-style-type: none"> • Top mgmt Presidential appointees in consultation with Ministry of Finance • President appoints members of Board of Directors with advice of Council of State 	<p><i>Government:</i></p> <ul style="list-style-type: none"> • Parliament should vet Presidential nominees as done for Ministers of State • Appoint [consultants] by tech'l competence • Board of Directors to be professionally diverse

<i>GHANA: Strategy Matrix</i>	
<i>Problem</i>	<i>Reform</i>
Coordination, Supervision, Monitoring and Evaluation	
<ul style="list-style-type: none"> • Valuation procedures not consistent with int'l standards • Little coordination among agencies at the border • Too much red tape • Computers reject forms due to improper completion 	<p><i>Stakeholders:</i></p> <ul style="list-style-type: none"> • System-based audit controls should be initiated <p><i>Government:</i></p> <ul style="list-style-type: none"> • Info infrastructure should be restored by CEPS and Ministry of Finance such that records are complete • Mainframe should be provided to handle all [rectusy] CEPS
Human Resource Management	
<ul style="list-style-type: none"> • Staff retrenchment very high • Low staff remuneration • Channel for public complaints is not clear • Inadequate logistics • Training of staff inadequate 	<p><i>CEPS:</i></p> <ul style="list-style-type: none"> • Regular surprise check could reduce large retrenchments <p><i>Government:</i></p> <ul style="list-style-type: none"> • Staff to be adequately remunerated • Funding to CEPS to be increased • Provide vehicles, upgrade border maps
Internal Control Systems	
<ul style="list-style-type: none"> • Inadequately trained personnel for monitoring and investigating of deviancy • Channel for addressing complaints not available 	<p><i>Government and CEPS:</i></p> <ul style="list-style-type: none"> • Training of new recruits to be intensified • Training of senior mgmt to be a continuous process <p><i>CEPS:</i></p> <ul style="list-style-type: none"> • Complaints Office should be established at CEPS

<i>GHANA: Strategy Matrix</i>	
<i>Problem</i>	<i>Reform</i>
Internal Anti-Corruption Mechanisms	
<ul style="list-style-type: none"> • Enforcement of Code of Ethics weak • Monitoring of officials haphazard • Too much red tape and complex regulations 	<p><i>Stakeholders:</i></p> <ul style="list-style-type: none"> • Revise staff regulations • Recruit and train more investigators and monitoring teams <p><i>Government and Stakeholders:</i></p> <ul style="list-style-type: none"> • Transparency in regulations and reduce discretionary power

<i>GHANA: Civil Service Reform</i>					
<i>Reform Proposals</i>	<i>Anticipated Benefits</i>	<i>Anticipated Risks</i>	<i>Steps Leading to Action: Government, Civil Society, Core Group</i>	<i>Anti-Corruption Contribution</i>	<i>Where the Bank Can Assist</i>
Decentralisation of basic social services to reg'l administrations This is part of local gov't reform and NOT civil service reform	<ul style="list-style-type: none"> It brings gov't to door step of ordinary people Mgmt of local projects in local hands 	<ul style="list-style-type: none"> Low mgmt capacity in decentralised organisations 	<ul style="list-style-type: none"> Gov't and civil society 	Modest	<ul style="list-style-type: none"> Provide tech'l assistance for training managers and building administrative and tech'l expertise at the grassroots
Fiscal decentralisation Medium Term Expenditure Framework (MTEF) is a component of the Public Financial Mgmt Reform Program (PURMARP)	<ul style="list-style-type: none"> To bring together all available resources of Ministries, Depts., Agencies into a common basket to achieve prioritisation of activities for 3-year budget framework 	<ul style="list-style-type: none"> Misappropriation 	<ul style="list-style-type: none"> Gov't 	Negative	<ul style="list-style-type: none"> Provide tech'l assistance for training managers and building administrative and tech'l expertise at the grassroots
Autonomous central agency for university education, syllabus designing examination Nat'l Council for Tertiary Education under Ministry of Education develops policy guidelines for mgmt of universities, polytechnics, but Academic Boards of universities draw up their syllabi	<ul style="list-style-type: none"> Not desirable 	<ul style="list-style-type: none"> It is extremely difficult for one agency to design courses for engineering, medicine, humanities, info technology, etc. 	<ul style="list-style-type: none"> Gov't, civil society to be involved in debate on funding tertiary education Core group can facilitate civil society and media debate 		<ul style="list-style-type: none"> Bank can assist in funding studies into ways to fund tertiary education through non-gov't budgetary means
<ul style="list-style-type: none"> Privatisation of hospitals Gov't hospitals exist independently of private hospitals <ul style="list-style-type: none"> Making them autonomous Selling attached properties Creating an agency for drug enforcement 	<ul style="list-style-type: none"> Not anticipated Not anticipated Not anticipated Not anticipated 	--	--	Negative	<ul style="list-style-type: none"> Operates with [UNFOA] & other bilateral drug enforcement agencies

<i>GHANA: Civil Service Reform</i>					
<i>Reform Proposals</i>	<i>Anticipated Benefits</i>	<i>Anticipated Risks</i>	<i>Steps Leading to Action: Government, Civil Society, Core Group</i>	<i>Anti-Corruption Contribution</i>	<i>Where the Bank Can Assist</i>
<p>Improving Civil Service Compensation System All compensations have been monetised and consolidated into salary</p>	<ul style="list-style-type: none"> Allows for greater central budgetary planning 	<ul style="list-style-type: none"> The system not working because of "run-away" inflation 	<ul style="list-style-type: none"> Gov't has just introduced a new salary structure designed by Price Waterhouse based on standardised classification of jobs and positions. How the new system would work is not yet clear. It is just in its first month of implementation. It involves ONLY CORE CIVIL SERVICE and not all public services. 	Negative	
<ul style="list-style-type: none"> Bank salaries with allowances of central gov't to be raised A new salary system rather developed under Price Water consultancy. This is IMF/WB-motivated 	<ul style="list-style-type: none"> Attempt at achieving standardisation in wage mgmt in civil service 	<ul style="list-style-type: none"> Once new system does not involve the whole public service (Police, army, banks, subverted organisations, parastatals, etc.) its success in addressing salary disparities is doubtful. 		Negative	<ul style="list-style-type: none"> Bank may assist with tech'l assistance and training programs to enable a more generalised LIVING WAGE system to be developed by local experts

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<ul style="list-style-type: none"> • Instead of gov't residence encouraging employees to build their own houses • Monetisation of senior officers facilities 	<ul style="list-style-type: none"> • Encourage employed to own property and to enjoy retirement in people 	<ul style="list-style-type: none"> • Discrimination against certain level of employees from enjoying funding facilities for housing projects • Low income earners & employees beyond 50 years are discriminated against 	Gov't and civil society	Modest	<ul style="list-style-type: none"> • To secure funding for lending banks, e.g. IFC loans with conditions to assist low income earners and aged
<p>Redressing public complaints regarding service quality</p> <ul style="list-style-type: none"> • Development and adoption of Citizen Charters • Creation of Citizen Rights Groups • Joint supervision of service quality and public complaints by service delivery institution and the civil society <ul style="list-style-type: none"> • Revamping the inquiry procedure on public complaints 	<ul style="list-style-type: none"> • Facilitating the improvement of service delivery <p>--</p> <ul style="list-style-type: none"> • To monitor standards of service delivery. Promotes greater understanding of the reform program thereby increasing transparency • Increase public confidence in both client services and core civil service 	<p>--</p> <p>--</p> <p>--</p> <p>--</p>	<ul style="list-style-type: none"> • Gov't to provide adequate funding for program • Core group to encourage civil society participation in the reform program at local levels 	<p>Modest</p> <p>Modest</p>	<ul style="list-style-type: none"> • Bank can assist Core Group with facilities such as transportation and funding and tech'l assistance

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<i>Reform Proposals</i>	<i>Anticipated Benefits</i>	<i>Anticipated Risks</i>	<i>Steps Leading to Action: Government, Civil Society, Core Group</i>	<i>Anti-Corruption Contribution</i>	<i>Where the Bank Can Assist</i>
<ul style="list-style-type: none"> Measures to encourage whistle-blowing <p>Not yet an option since this requires adequate legal framework.</p> <p>Anonymous letters and reference calls are encouraged under certain circumstances</p>	<ul style="list-style-type: none"> Anonymous letters and telephone calls protect "whistle-blowers." Usually info is investigated by Serious Fraud Office or Public Info Bureau in the Office of President. 	<p>Risks are less but sometimes can prolong investigations when insufficient info is given in such reports</p>	<ul style="list-style-type: none"> Mass media and civil society can be encouraged by Core Group through symposia and public debates to educate on modalities relating to use of anonymous letters and phone calls. Whistle-blowing needs study by gov't 	<p>Important</p>	