

ANTI- CORRUPTION POLICY



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3.2. 12 ANTI-CORRUPTION POLICY

POLICY No. 2100	
ANTI-CORRUPTION POLICY	
Subject Area	Other Matters
Responsible Officer	The Vice-Chancellor
Approval	Council

1 Purpose

The University of Ghana Anti-Corruption Policy is a policy based on the National Anti-Corruption Action Plan (NACAP) which is a ten-year Action Plan adopted on 3rd July 2014 as Ghana’s strategy for addressing corruption in the society as stipulated under Article 35 (8) of the 1992 Constitution of Ghana. NACAP is to be implemented by public, private and non-profit organizations and institutions. Pursuant to the implementation of NACAP by public sector organizations and institutions specifically, the Office of the President issued directives in March 2015 which provided among others that:

- i. 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 the implementation of roles specifically assigned to their institutions under NACAP.
- ii. The Ministry of Finance should ensure that MDA’s, MMDA’s and all public sector institutions budget for the implementation of specific programmes assigned to them under the NACAP, and
- iii. Ministers, Chief Executives and Heads of public sector institutions shall submit quarterly reports on the implementation of NACAP Monitoring and Evaluation Committee (MONICOM) at the CHRAJ, with copies to the Office of the President.

The University of Ghana as a public institution is required to implement certain general and specific roles assigned to it. CHRAJ, in collaboration with the NACAP Monitoring and Evaluation Committee (MONICOM) is required to issue an Annual Work Plan guiding the University and other Implementation Partners on the activities prioritized for each year.

The University is therefore required to submit a half-yearly report on the progress of implementation of the assigned programme for each year.

There is, therefore, the need for the creation of a Committee on Anti-corruption to see to the implementation of the policy

1.1 Objectives of the Policy

The objectives of this policy are to:

- a. Prevent corruption at all levels within the university community
- b. Create awareness and conscientize members of the university community on the offence and effect of corruption on society
- c. Prohibit and sanction conducts of corruption
- d. Investigate allegations and reports of incidents of corruption in the University

2 Offence and Definitions

2.1 Offence

A person engages in misconduct if the person engages in an act of corruption under this Policy or commits an offence that pertains to corruption under the laws of Ghana.

2.1.1. A person who commits a misconduct under this Policy shall be given a hearing before the appropriate Disciplinary Committee, and upon conviction is punishable under Paragraph 5.7 of this policy.

2.1.2. Notwithstanding clause 2.1.1 above, where the offence also falls under any national law including the underlisted laws, the University shall have the right to deal with the culprit through its disciplinary procedures aside reporting the matter to the Ghana Police Service for prosecution. The laws include

- i. Criminal Offences Act, 1960 (Act 29)
- ii. Financial Administration Act 2003 (Act 654)
- iii. Internal Audit Agency Act, 2003 (Act 658)
- iv. Public Procurement Act, 2003 (Act 663)
- v. Whistleblowers Act, 2006 (Act 720)
- vi. Anti-Money Laundering Act, 2008 (Act 749)
- vii. Public Financial Management Act, 2016 (Act 921)

2.2 Corruption

- a. Corruption is the misuse of entrusted power for private gain. It includes but is not limited to bribery, extortion, embezzlement, misappropriation, trading in influence, abuse of office, abuse of power, illicit enrichment, laundering of proceeds of crime and concealment, obstruction of justice, patronage, nepotism, and conflict of interest.
- b. An Act of Corruption is any act that falls within the definition of corruption herein. It shall also include an attempt to act in such a manner.

2.3 Bribery

- a. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision and forms part of Corruption.
- b. Bribery also refers to an inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- c. Bribery is not limited to the act of offering a bribe. It also refers to the receiving of a bribe.
- d. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world.
- e. Employees must not accept bribes in any degree, and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from a member of the Committee.

2.4 Gifts and Hospitality

The University accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain, or reward the retention of a business or a business advantage, or as an explicit or implicit exchange

for favours or benefits.

- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- g. It is given/received openly, not secretly.
- h. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- i. It is not above a certain excessive value, as pre-determined by the University Council or the Vice-Chancellor on behalf of Council.
- j. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the University Council or the Vice-Chancellor on behalf of Council.
- k. Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Vice-Chancellor through the Anti-Corruption Committee Secretariat and is recorded in the gift register.

2.5 Facilitation Payments and Kickbacks

- a. The University does not accept and will not make any form of facilitation payments of any nature. We recognize that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognize that they tend to be made by low-level officials with the intention of securing or speeding up the performance of a certain duty or action.
- b. The University does not allow kickbacks to be made or accepted. We recognize that kickbacks are typically made in exchange for a business favour or advantage. The University of Ghana recognizes that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:
 - i. Keep any amount to the minimum.
 - ii. Ask for a receipt, detailing the amount and reason for the payment.
 - iii. create a record concerning the payment.
 - iv. Report this incident to your immediate supervisor.

2.6 Political Contributions

The University will not make donations, whether in cash, kind, or by any other means, to support any political party or candidate. We recognize this may be perceived as an attempt to gain an improper business advantage and therefore a corrupt act.

2.7 Charitable Contributions

- a. The University accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. **Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of**

bribery.

- b. The University will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Vice-Chancellor.

2.8 Conflict of Interest

A person who is found to be in a situation in which that person is in a position to derive personal benefit from actions or decisions made in his/her official capacity, including situations under section 50 of the University of Ghana Statutes, 2011 as amended is in a situation of conflict of interest and is guilty of corruption unless the affected individual could reasonably not have known about the conflict.

2.9 Embezzlement and Misappropriation

A person who without lawful justification takes or withholds assets or funds belonging to the University, for the purpose of appropriating same for his personal use, which assets or funds are in the control of or have been entrusted to such person, either to be held or to be used for a specific purpose engages in embezzlement and misappropriation and is guilty of Corruption.

2.10 Extortion

A person who under authority of his office, demands or obtains from any person, whether for himself or any other person any money or valuable consideration which he knows that he is not lawfully authorized to demand or obtain, or at a time at which he knows that he is not lawfully authorized to demand or obtain the same engages in extortion and is guilty of Corruption.

2.11 Fraud

A person who intentionally deceives an authorized person or a person acting on behalf of the University or another person to secure unfair or unlawful gain or deceives others by unjustifiably claiming or causing others to credit that person with an achievement or accomplishment or quality engages in fraud and is guilty of Corruption.

2.12 Money laundering

A person who knows or ought to have known that property is or forms part of the proceeds of unlawful activity and the person

- a. converts, conceals, disguises or transfers the property;
- b. conceals or disguises the unlawful origin, disposition, movement or ownership of rights with respect to the property; or
- c. acquires, uses or takes possession of the property is engaging in Money Laundering and is guilty of Corruption.

2.13 Aiding and Abetment

A person who knowingly, whether directly or indirectly, instigates, commands, counsels, procures, solicits, or in any manner purposely aids, facilitates, encourages, or promotes, by his act or otherwise for the purpose of aiding, facilitating, encouraging or promoting the commission of a corrupt act by any other person engages in abetment and is also guilty of Corruption.

2.14 Corrupt Practices in Procurement

- a. A person who engages in corrupt practices under section 93 of the Public Procurement Act, 2003 (Act 663) as amended by the Public Procurement (Amendment) Act, 2016 (Act 914) is guilty of corruption under this policy.
- b. For the purpose of this policy, corrupt practice shall be any act of corruption engaged in at any stage of a procurement procedure.
- c. A person who commits acts mentioned in a and b above for the purpose of gaining a personal benefit or reward is guilty of Corruption

2.15 Corruption by a Public Officer

2.15.1 Sections 239 -241, 244, 245 and 252 of Act 29 provide as follows:

- a. Every public officer or juror who commits corruption, or wilful oppression, or extortion, in respect of the duties of his office, shall be guilty of a misdemeanour.
- b. Whoever corrupts any person in respect of any duties as a public officer or juror shall be guilty of a misdemeanour.
- c. A public officer, juror, or voter is guilty of corruption in respect of the duties of his office or vote, if he directly or indirectly agrees or offers to permit his conduct as such officer, juror, or voter to be influenced by the gift, promise, or prospect of any valuable consideration to be received by him, or by any other person, from any person whomsoever.
- d. A person is guilty of corrupting a public officer, juror, or voter in respect of the duties of his office or in respect of his vote, if he endeavours directly or indirectly to influence the conduct of such public officer, juror, or voter in respect of the duties of his office or in respect of his vote, by the gift, promise, or prospect of any valuable consideration to be received by such public officer, juror, or voter, or by another person, from any person whomsoever
- e. If, after a person has done any act as a public officer, juror, or voter, he secretly accepts, or agrees or offers secretly to accept for himself or for any other person, any valuable consideration on account of such act, he shall be presumed, until the contrary is shown, to have been guilty of corruption, within the meaning of this Chapter, in respect of that act before the doing thereof.
- f. If, after a public officer, juror, or voter has done any act as such officer, juror, or voter, any other person secretly agrees or offers to give to or procure for him or any other person any valuable consideration on account of such act, the person so agreeing or offering shall be presumed, until the contrary is shown, to have been guilty of having, before the doing of such act, corrupted such public officer, juror, or voter, in respect of such an act.
- g. Whoever accepts, or agrees or offers to accept any valuable consideration, under pretence or colour of having unduly influenced, or of agreeing or being able to influence, any person in respect of his functions as a public officer or juror, is guilty of a misdemeanour.
- h. Whoever gives, or agrees or offers to give to any public officer any valuable consideration for the grant to himself or to any other person of any benefit or advantage or for the exercise of influence in favour of himself or any other person is guilty of a misdemeanour.”

3. Application and Scope

- a. This policy applies to all members of the University of Ghana community as defined in section 3 of the University of Ghana Act, 2010 (Act 806) on all campuses.

- b. The policy also applies to all persons who serve the University as its agents and are under the control of the University in all its locations and affiliates.
- c. All third parties who deal with the University in one way or another but are not members or agents of the University.

4. Implementation and Compliance Institution

The main institutions for the implementation and compliance of this policy are:

- a. The University Council
- b. The Vice-Chancellor
- c. The Anti-Corruption Committee
- d. Secretariat of the Anti-Corruption Committee

4.1 The University Council

The University Council will have the overall responsibility for ensuring that the University complies with the Anti-Corruption Policy. It includes ensuring that:

- a. The Anti-Corruption Policy is reflected in all other policies and contracts of the University. The principles of the Anti-Corruption Policy should be referenced and put into specific action in other University documents such as the University Statutes, Strategic Plan, Financial Regulation, Student Handbooks, Conditions of Service, Code of Conduct and other policies and regulations.
- b. The Anti-Corruption Policy is made available to students and employees and should be introduced at orientation programmes for both students and staff.
- c. The Policy is made available on the University's website, among others.
- d. Measures are put in place to guarantee the creation and maintenance of an environment that gives a clear indication to all persons that the University shall not tolerate or countenance any form of corruption by any person and that acts of corruption will be punished.
- e. An effective institutional framework on Anti-Corruption is established.

4.2 The Vice-Chancellor

The Vice-Chancellor, as Chief Disciplinary Officer of the University, is responsible for ensuring compliance with the Anti-Corruption Policy and shall specifically do the following:

- i. Constitute the Anti-Corruption Committee established under this policy by appointing the members.
- ii. Receive reports of findings and recommendations of the Anti-Corruption Committee and ensure that the recommendations are acted upon promptly.
- iii. Send half-yearly reports on the progress of implementation of the assigned programme for each year to the Chairman, MONICOM at CHRAJ with copies to the Office of the President as shown in Schedule III to this Policy.

4.3 Anti-Corruption Committee

4.3.1 Membership

- a. The Committee shall be composed of five (5) members: a Chairperson and four (4) other members and shall be appointed in accordance with Schedule I to the Policy.
- b. The Chairperson shall be a person with relevant experience in corruption related cases and principles.
- c. There shall be gender parity in the composition of the Committee.
- d. Competent external individuals from other relevant institutions may be invited to serve on the Committee as ex-officio members, or to act as expert advisers.

4.3.2. Responsibilities

The Committee shall address corruption issues relating to the University community by:

- a. planning and implementing the University's education and training programmes on Corruption.
- b. widely disseminating of this policy to the University community;
- c. providing educational materials to promote compliance with the policy and familiarity with local reporting procedures, and
- d. training of other University personnel who may be responsible for responding to informal reports of corruption.
- e. conducting investigative hearings into specific complaints of corruption.
- f. sending of reports on investigations to the Vice- Chancellor with recommendation of disciplinary action before the appropriate disciplinary Committee or otherwise.
- g. Overseeing the implementation of the roles, both general and specific to the University outlined by the NACAP MONICOM in its annual reporting framework. (see www.chraj.gov.gh)

4.3.3. Leadership

- a. The Vice-Chancellor shall appoint the members of the Committee.
- b. The Chairperson shall be instrumental in convening meetings, initiating enquiry processes and ensuring the integrity of all proceedings relating to investigation of grievances.

4.3.4. Qualities

All members of the Committee shall have;

- i. good moral standing,
- ii. high credibility,
- iii. candour
- iv. a good reputation.

4.3.5. Term of Office

Members of the Committee shall serve for a term of two years, after which they may be appointed to serve a further two-year term only.

4.3.6. Review of Policy

This Policy shall be reviewed periodically.

4.3.7. Secretariat of the Anti-Corruption Committee

4.3.7.1. The Anti-Corruption Committee shall have a Secretariat which shall be serviced by the Office of the Legal Counsel and headed by the Legal Counsel.

4.3.7.2. The Secretariat shall comprise of the Legal Counsel, a Legal Officer from the Office of the Legal Counsel, a Secretary of a rank higher or equivalent to an Assistant Registrar and other officers that may be appointed by the Vice-Chancellor on the advice of the Legal Counsel.

4.3.8. The Secretariat shall:

- a. manage the affairs of the Committee
- b. organize meetings and Investigative hearings of the Committee
- c. take the minutes of the meeting and record the hearings of the Committee
- d. keep such records or minutes and decisions of the Committee
- e. liaise between the Committee and CHRAJ in the implementation of this Policy
- f. be responsible for ensuring compliance with the Policy.
- g. Prepare and submit a quarterly report to the Vice-Chancellor and the University Council on the work of the Committee.
- h. perform any other assignment or duty assigned by the Vice- Chancellor.

5 Formal Reporting/Complaint Mechanism

5.1. Duty to Report

5.1.1 All members of the University Community or persons who operate within the University as well as third parties, have a duty to report all acts of corruption by members of the University or on the part of third parties in their relations with the University or any member of the University.

5.1.2 Any member of the University Community who believes that he or she has been a victim of corruption or that another person is engaging in acts of corruption in violation of this Policy has a duty to report the matter and utilize the procedures described under this Policy for redress. The complainant shall not be reprimanded, retaliated against, or discriminated against in any way for initiating an inquiry or complaint in good faith.

5.1.3 A person may make a report where that person has information or reasonable cause to believe that a breach of this Policy, the University of Ghana Financial Regulations and Governance Policy, 2020, section 92 of the Public Procurement Act, 2003 (Act 933) as amended, or any other law pertaining to corruption has occurred in a way that;

- a. there is or there is likely to be waste, loss, misappropriation or mismanagement of the University's resources, assets or income due to acts of corruption;
- b. a person is exploiting his/her position to gain advantage or an unfair benefit or that a person is engaging in corruption as defined in this Policy

1. Procedure

1.1 A report shall be made in writing to the Anti-Corruption Committee through any of its members or the secretariat by using the Form in Schedule II.

- 1.2 The report shall contain as far as practicable
- i. the full name, address or Department of the complainant;
 - ii. the nature of the act of corruption in respect of which the report is made with particulars or details;
 - iii. the person alleged to have committed the act of corruption;
 - iv. the time and place where the alleged act of corruption took place;
 - v. the full name, address and description of a witness to the commission of the act of corruption (if any);
 - vi. any available evidence
 - vii. whether the complainant is directly or indirectly connected to the person against whom a complaint has been lodged.

5.2. Protection of Complainant

- a. The Anti-Corruption Committee upon receipt of a complaint shall take all necessary measures to ensure that the complainant is protected from abuse, victimization or discrimination if the complainant is likely to face such abuse, victimization or discrimination.
- b. The Committee shall report any complaint of abuse, victimization or discrimination to the Vice-Chancellor and make recommendations.

5.3. Presumption of Innocence

A person against whom a complaint is lodged shall be presumed innocent of that charge unless and until there is a final finding of culpability by the Committee or a stipulated admission to the charge by that person.

5.4. Right to Representation

A complainant and a respondent in a corruption matter have the right to representation by a legal counsel of their choice.

5.5. Investigations

5.5.1 All complaints and reports of acts of corruption shall be investigated by the Committee.

5.5.2 Where upon investigation of a complaint the Committee finds a breach of the policy but the breach constitutes an offence under national Law, and the matter is already being investigated or prosecuted by the police, Office of the Attorney-General and Minister for Justice or any other public authority, the Committee may recommend that the relevant disciplinary Committee withhold proceedings of the matter until a determination is made by a Court of competent jurisdiction or by the particular authority.

5.5.3 Where a person is found guilty of any form of corruption by a court of competent jurisdiction, it shall form prima facie evidence of misconduct on which basis the matter may be referred to the relevant Disciplinary Committee for prosecution under Statute 43 of the University Statutes.

5.5.4 Notwithstanding 5.5.3 above, each case shall be considered on its own merit

5.5.5 The Committee shall submit a report on the investigations together with its recommendations to the Vice-Chancellor.

6. Disciplinary Procedure and Sanctions

6.1 Where a person is alleged to have breached the Anti-Corruption Policy or committed an offence under the policy, the culprit shall be referred to the appropriate Disciplinary Committee for prosecution.

6.2 Notwithstanding clause 6.1 above, where the act of corruption falls under both this Policy and a national law, nothing precludes the University from reporting the matter to the appropriate authority for prosecution as well as referring the person to the appropriate disciplinary committee.

6.3 Where the matter involves a third party, or other member of the University who is neither a senior member, staff or junior member;

- a. A report may be made to the appropriate authority for prosecution, or
- b. The person may be invited to appear before the Committee for investigation of the matter and make appropriate recommendations, which may include banning of the person (whether natural or juristic) from any dealings with the University to the Vice-Chancellor.

6.4 A member of the university who is found guilty by the appropriate Disciplinary Committee shall be sanctioned as follows:

- a. In the case of a junior member, expulsion from the University.
- b. In the case of a staff or senior member, termination of employment with the University.
- c. Where in the reasoned view of the relevant Disciplinary Committee, a person ought to be reprimanded the Committee shall recommend it to the Vice-Chancellor.

7. Duty to Cooperate

Employees and students must cooperate with University investigations into corruption accusations which are conducted by the Anti-Corruption Committee. Refusal to cooperate with an investigation or to impede an investigation may result in disciplinary action.

8. Malicious or False Accusations

The University recognizes that malicious or false accusations could have a serious impact on the reputation and integrity of individuals. As such, malicious or false accusations will be treated very seriously. Anyone who is found to have made a deliberately malicious or false accusations against another person shall be subject to formal disciplinary action under the appropriate university procedure.

9. Promotion of Anti-Corruption Policy

9.1 Dissemination of information on Anti-Corruption Policy

9.1.1. This Policy document shall be published and disseminated without charge to all members of the University community. It shall be displayed at conspicuous places in all Colleges, Schools, Departments, Institutes, Centers, lecture halls and other public areas as far as possible. It shall also be made available to newly recruited staff of the University and newly admitted students.

9.1.2. It shall be brought to the attention of third parties: contractors, suppliers, consultants and all persons who deal with the University in any capacity.

9.1.3 It shall be the duty of all persons under clause 7 of this Policy to read the Policy and comply with it.

9.2 Training and capacity development

All members of the Anti-Corruption Committee shall receive appropriate training about corruption and how to apply this Policy and the grievance procedures in order to discharge their duties in an efficient and sensitive manner.

10. Roles of the University Under NACAP

10.1. General Role

The General role is designed for implementation and reporting by all implementing agencies and organizations, including public sector organizations, private sector and not-for-profit organizations.

10.2. Specific Role

The specific role is for implementation of specific activities by the lead and collaborating implementing agencies as applicable. Therefore, at the end of every quarter, the Anti-Corruption Committee is expected to report on all the activities under the “General Roles” and some of the activities under the four strategic objectives as may be seen in Schedule III to this Policy.

11. Reference Documents

- a. The 1992 Constitution of Ghana
- b. The National Anti-Corruption Action Plan
- c. The University of Ghana Act, 2010 (Act 806)
- d. The University Statutes, 2011 (as amended)
- e. The Criminal Offences Act, 1960 (Act 29)
- f. Whistleblowers Act, 2006 (Act 720)

12. Schedules

Schedule I

COMPOSITION OF ANTI-CORRUPTION COMMITTEE

- A Chairperson who may be a retired Justice of the Superior Courts of Judicature or a lawyer qualified to be so appointed;
- Two (2) senior members of the University, who are persons of high moral integrity one of whom is a woman;
- One (1) representative from the Commission on Human Rights and Administrative Justice (CHRAJ)
- One (1) representative from the Ghana Anti-Corruption Coalition.

Schedule II

COMPLAINT FORM

Name of Complainant:

Address of Complainant:

Person Complained of/Respondent:

Location of Respondent

Details of Act of Corruption Complained of with Particulars:

.....

Name and address of witness (if any)

Date:

Signature:

Name of Committee Member receiving the complaint

Office/Address of Member

Schedule III

The Reporting Framework may be obtained yearly on the CHRAJ website, at <https://chraj.gov.gh/nacap/>. Below is a sample of the reporting framework

[A] BACKGROUND INFORMATION

Name of Implementing Partner:

Date of submission (DD-MM-YY):

Reporting Period:

The addresses for submission of Reports are as follows:

Address for Submission:	Copy to:
CHAIRMAN (MONICOM)	THE CHIEF OF STAFF
C/O THE COMMISSIONER	OFFICE OF THE PRESIDENT
CHRAJ, P.O. BOX AC 489,	FLAGSTAFF HOUSE,
OLD PARLIAMENT HOUSE,	KANDA,
J.E.A. MILLS HIGH STREET,	ACCRA
ACCRA	EMAIL: requests@presidentsecretariat.gov.gh
EMAIL: nacap@chrajghana.com fadrahman@chrajghana.com	

EXPLANATION OF THE SEGMENTS IN THE MONITORING AND EVALUATION FRAMEWORK FOR REPORTING

Broad Activity	Specific Activity	Indicator for Specific Activity	Frequency of Data Collection	Data Source	Data Disaggregation	Implementing Partners		Results /Status of Implementation
						Lead	Collaborating	

The columns are explained below:

Broad Activity: The long-term activity captured in the 2015-2024 NACAP document, from which specific activities are derived.

Specific Activity: The activities derived from the broad activities that are expected to be undertaken by specific stakeholders for the particular reporting year.

Specific Indicator: The measurable indicator that will be monitored and evaluated based on the respective specific activity. The indicator shows the expected results from the implementation of the specific activity.

Frequency of Data Collection: The number of times and or how often a given data was collected on the indicator.

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

Data Disaggregation: Indicates the separation of data/ information into its component parts, e.g. gender, regional, rural/urban etc.

Implementing Partners: This column contains the Lead and the Collaborating Implementing Partners. The “Lead implementing Partners” has the primary responsibility to undertake the specific activities. They would be held responsible for the success or failure during implementation.

The “Collaborating Implementing Partners” is to support the implementation of the specific activities. It refers to agencies and other implementing partners or stakeholders who are either beneficiaries, or those to be directly impacted by the implementation of the said activity. It also refers to those who may be interested in the execution of the activity.

Where an agency has been omitted from the lead/collaborating implementing agency column for a specific activity, but the agency/organization has operations related to or has interest in the broad activity, the agency/organization may implement aspects of the broad activity and report on it.

Result/Status of Implementation: This column provides for measurable output/outcome of the specific activity. It covers either quantitative or qualitative measurable output/outcome of the specific activity.

In completing this column, implementing agencies should be as brief as possible.

For avoidance of doubt, the areas to complete are: “Data Source,” “Frequency of Data Collection” and “Result/ status of implementation”.

Where an implementing agency is unable to undertake a required specific activity, the agency should indicate “NOT UNDERTAKEN”, in the “result” column and reasons must be provided for not undertaking the activity.

Sample of Report

STRATEGIC OBJECTIVE 1: TO BUILD PUBLIC CAPACITY TO CONDEMN AND FIGHT CORRUPTION AND TO MAKE CORRUPTION A HIGH- RISK LOW- GAIN ACTIVITY

Broad Activity	Specific Activity	Indicator for Specific Activity	Frequency of Data Collection	Data Source	Data Disaggregation	Implementing Agency	Results (Status of Implementation)
						Lead	Collaborating
2. Organize regular public education and awareness programmes on the evils of corruption and the ethos of anti-corruption in MDAs, general public, and private sector organizations.	Organize regular public education and awareness programmes in MDAs.	Number of programmes organized in MDAs.			National, Regional, District, Male & Female	CHRAJ, PEF	MDAs, NCCE, CSOs
	Organize public education and awareness programmes for the general public nationwide.	Number of programmes organized for the general public at the regional level.			National, Regional, District, Male & Female, Print, Electronic, Social Media	CHRAJ, CSOs	NCCE, RCCs
	Organize programmes for Private Sector nationwide.	Number of programmes organized for Private Sector Organizations.			National, Regional, District, Male & Female	CHRAJ, PEF	CSOs
3. Create Public fora /community outreach/clinics at District Level.	Conduct outreach programmes in selected districts.	Number of outreach programmes conducted			District	CHRAJ, GACC	NCCE, MDAs, MMDAs, PSC

5. Mainstream Anti-Corruption, Ethics and Integrity in Public, Private Sector, Civil Society and Religious Organization.	Develop anti-corruption, ethics and integrity as part of organizational culture.	Anti-Corruption, Ethics and Integrity Issues developed			National, Regional, District	CHRAJ, PSC, NDPC, GES/ MoE, PEF	Religious Bodies, Private Sector Organizations, MDAs
	Publicise anti-corruption, ethics and integrity as part of organizational culture	Anti-Corruption, Ethics and Integrity Issues publicized.			National, Regional, District	CHRAJ, PSC, NDPC, GES/ MoE, PEF	Religious Bodies, Private Sector Organizations, MDAs
6. Introduce modules and elements to highlight and strengthen good ethical values in primary, secondary and tertiary, formal and non-formal education.	Hold consultations to introduce the modules.	Consultations held.			National	GES, MoE	CSOs, CHRAJ, AG, Non-Formal Education Division of GES, NCCE, MoF, A-G, GNAP, CHASS, EOCO, Private Sector.
	Develop road map for introducing the modules.	Road map developed.					
7. Develop co-curricular anti-corruption activities, such as integrity clubs in Junior and Senior High schools.	Develop guidelines for the establishment of integrity clubs in Junior and senior high schools.	Guidelines developed.			National, regional and District.	CHRAJ, Auditor General.	GES, NCCE, Heads of Junior & Senior High Schools, MOF, Police, A-G.

	Facilitate the formation and revamping of integrity clubs in Junior and Senior High Schools in each Region.	At least 20 integrity clubs established in Junior High schools nation-wide.		National, regional and District.	CHRAJ, Auditor General.	GES, NCCE, Heads of Junior & Senior High Schools, MOF, Police, AG.
		200 senior high schools integrity clubs revamped.				
Provide educational corruption fighting materials for public schools and universities, and general public.	Hold consultations on development of anti-corruption materials for schools and universities.	Number of Consultations held.		National, regional & District	CHRAJ, & EOCO	GACC, MOE, MMDAs, MDAs, CSOs Universities, Educational institutions & Schools.
	Develop a road map for the preparation of anti-corruption educational materials for public schools and universities.	Road map developed.		National, regional & District.	CHRAJ & EOCO.	GACC, MOE, MMDAs, MDAs, CSOs Universities, Educational institutions & Schools.
	Develop and disseminate anti-corruption materials for the general public, schools, universities and the general public.	Number of materials developed and disseminated.		National, regional & District	CHRAJ, & EOCO	GACC, MOE, MMDAs, MDAs, CSOs Universities, Educational institutions & Schools.

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Assented to on December 2020 under the hand of

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