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Final Evaluation of the Anti-Corruption, Rule of Law and Accountability Programme

Ghana

Specific Contract.

2018/1744

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Final Report

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ABBREVIATIONS

Acronym	Definition
AC	Anticorruption
ARAP	Accountability, Rule of Law and Anti-corruption Programme
CHRAJ	Commission on Human Rights and Administrative Justice
Cu	Coordination Unit
ECA	European Court of Auditors
EG	Environmental Governance
EOCO	Economic and Organised Crime Office
EPA	Environmental Protection Agency
EuD	European Union Delegation
FIIAPPP	International and Ibero-American Foundation for Administration and Public Policies
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH
GPS	Ghana Police Service
HQ	Headquarters
ICBs	Independent Constitutional Bodies
JS	Judicial Service
KAIs	Key accountable institutions
KRA	Key Result Area
LAC	Legal Aid Commission
M&E	Monitoring and Evaluation
NACAP	National Anti-Corruption Action Plan
NACoRD	National Anti-Corruption Action Plan Reporting Dashboard
NCCE	National Commission for Civic Education
OAG	Office of the Attorney General
PIAC	Public Interest and Accountability Committee
PPSB	Police Professional Standards Bureau
PRCu	Public Relations and Complaints Unit
SIA	System for Activities information (knowledge management tool)
ToC	Theory of Change



EXECUTIVE SUMMARY

This report presents the final evaluation of "Accountability, Rule of Law and Anti-corruption Programme" (ARAP) over the period January 2016 to January 2021.

The ARAP with a budget of 20 million funded under EU National Indicative Programme 11th EDF (2014-2020). ARAP represents a timely support of action in the framework of the Ghanaian engagement in focusing on anti-corruption, governance and accountability actions for reinforcing the economic & sustainable development of the country.

The overall evaluation process was led by a Reference Group (RG), comprising of representatives from the Coordination Unit of ARAP which is managed by FIIAPP, one representative each from STAR Ghana and NCCE, the National Authorizing Officer (NAO-Ministry of Finance), and the Evaluation Manager.

Each evaluation phase of the evaluation has been presented and discussed with the RG and the key institutions.

The purpose and the structure of the evaluation

The overall purpose of the evaluation, as noted in the terms of reference, is to provide an independent assessment of ARAP including whether ARAP has produced the intended outputs, and the reasons behind the observed ARAP successes and/or failures; to identify lessons learnt; and to make recommendations to inform the EUD, EU member States and Ghana, as well as future programming.

The evaluation is based on a review of 98 documents, Focus Group Discussions (FGDs), 16 remote interviews, a number of semi-structured interviews with 46 participants, and one field visit in **Koforidua district including a visit in anyinan mining area.**

Brief outline of the "Accountability, Rule of Law and Anti-corruption Programme" (ARAP)

The design of the EU Programme named "Accountability, Rule of Law and Anti-corruption Programme" (ARAP) with a budget of EUR 20 million aimed to support the efforts of the Republic of Ghana and to provide timely support to changes to the legislative and institutional framework. The ARAP programme ran from 29 January 2016 to 29 January 2021. The ARAP programme sought to contribute to fight against corruption by enforcing reform processes in the area of rule of law, accountability, through key institutions, while at the same time increasing the ability of the public, media to hold duty bearers to account. It put a particular emphasis on promoting good environmental governance in Ghana. The overall Programme was therefore structured around two Key Result Areas (KRA) as follows:

- **Key Result Area 1:** Accountability is enhanced, leading to increased accountability, a reduction in corruption and increased environmental governance.
- **Key Result Area 2:** Compliance with and respect of the rule of law is improved, particularly in the areas of accountability and anti-corruption.

The ARAP was implemented under the responsibility of the International and Ibero-American Foundation for Administration and Public Policies (FIIAPP), with a management unit/ coordination Unit based in Accra. The Financing Agreement was broken down by cost types and spread among several organisations (FIIAPP, FCDO – STAR-Ghana and NCCE).

- The International and Ibero-American Foundation for Administration and Public Policies (FIIAPP) as a beneficiary of EU delegation Agreement with the budget of €13m provided long and short-term technical expertise towards technical assistance to Ghanaian institutions.
- The then UK Department for International Development (DFID) now the Foreign, Commonwealth and Development Office (FCDO), as a beneficiary of EU delegation agreement with the budget of €4m contributing into a pool fund (which included with other donors) supporting STAR-GHANA, with activities aimed at civil society organisations, Parliament and the media.
- A Grant to the National Commission for Civic Education (NCCE) with the budget of €2.2m to deliver a civic education campaign.

An important feature of the ARAP is the holistic focus on strategic cooperation within several key institutions of Ghana as well as CSOs, Media, parliament. ARAP intends to strengthen the functioning of Ghanaian institutions, the cooperation among key organisations by supporting their institutional and operational capacity in order to reinforce the accountability, the rule of Law as well as the civic demand and institutional supply of states institutions to maximize the effectiveness of anti-corruption work all over the territory. The programme involved key stakeholders, namely, the Commission for Human Rights and Administrative Justice (CHRAJ), the Ghana Police Service (GPS), the Judicial Service of Ghana (JS), the Office of the Attorney General (OAG), the National Commission for Civic Education (NCCE), Legal Aid Commission (LAC), the Environmental Protection Agency (EPA), Economic and Organised Crime Office (EOCO) as well as CSOs, Media, parliament.



The ARAP final evaluation followed a standard Qualitative Evaluation design. The final evaluation examined and re-constructed the ARAP underlying theory of change. Based on this, a set of seven evaluation questions were developed. These questions focused on the strategic relevance of the design and how closely it met institutional and civic needs on the ground; the coherence of the ARAP activities developed within various institutions for designing a model of inter-institutional collaboration aligned on NACAP objectives and the accountability chain; the process and the management of ARAP programme against the expected results of the ARAP, the appropriateness of the decentralised management modalities used with the three implementing partners (e.i. FIIAPP Delegation Agreement, NCCE Grant Contract, STAR Ghana Delegation Agreement through UK FCDO), the results obtained on accountability, Rule of Law and Anti-corruption and the impact and sustainability at this stage including the challenges and opportunities that can inform future interventions. The evaluation team also considered, the EU added value of the programme and the mainstreaming of gender, environment and climate change into ARAP.

The answers to the 7 questions and an underlying set of judgment criteria with evidence and indicators are presented in this report. The report provides a summary of findings under four clusters: strategic relevance; coherence, process (efficiency), and results (effectiveness); impact and sustainability of ARAP contribution leading to a synthesised set of conclusions and recommendations.

The main findings

ARAP Relevance

ARAP is a direct response to the EU priorities under the 11th EDF (2014-2020), Ghanaian governmental priorities as well as the evolving needs of state institutions and civil society in Ghana, where the traditional reactive approach in fighting corruption has proved to be inadequate over time with the growing complexity in crimes which makes corruption much more difficult to detect and prove. **ARAP is a very unique programme** and the first of its kind to attempt a holistic approach tailoring the programme to the needs of key public institutions as well as civil society actor's needs for creating a common understanding of interrelated corruption issues by restoring institutional accountability and rule of law and enhancing the role of the citizenry in identifying and reporting corruption cases.

The ARAP represents **an adequate tool** of action in the framework of the Ghanaian engagement on Accountability, Rule of Law and Anti-corruption. The ARAP intervention logic addresses Ghanaian institutional and CSO immediate needs, as well as a comprehensive and integrated approach to create an 'enabling environment' for fighting against corruption by enhancing the rule of law and institutions accountability as well as citizenry engagement. However the ARAP's designed objective was too ambitious, given the complexity of corruption issues which are deeply embedded in social, political and economic dynamics with many interconnected causes and effects on sectors and actors, the key stakeholders' current capacities, the poor collaboration among public institutions and the longer timeframe required to realistically change behavior. The design of ARAP did not anticipate these external constraints, nor did it anticipate the bottlenecks related to coordination (vertical and horizontal) among institutions.

Coherence of the ARAP

The consistency of the overall programme was ensured by the ARAP intervention logic involving the key stakeholders for addressing the dynamics of change in a holistic and comprehensive way as well as the consideration of interrelated issues. ARAP has supported new bridges of cooperation among key stakeholder institutions. ARAP has also exposed the key stakeholders to recognized international standards and practices with the Peer-to-peer learning experience and organization of international exchange programmes in environmental crimes prosecution for judges and prosecutors (OAG and EPA). This approach has enabled representatives of various institutions to establish formal and informal contacts contributing to further experience sharing and network building. However, it is also not clear if those collaborative partnerships are officially embedded in the func-



tioning/workload of the relevant institutions. There is no evidence, yet that ARAP support has established a coherent and comprehensive problem driven approach among all institutions and a result framework to track institutional performance for fighting against corruption.

The **demand and supply** dichotomy of the ARAP design through the expected results KRAs resulted in a **fragmentation of activities between various institutions and Civil society actions**. This made the reconciliation of actions of the various implementing partners to close the loop from detection, reporting, investigating, prosecution and adjudication, across the demand and supply spectrum, a challenge. It was not evident how one action fed into or reconciled with the next level. The relative absence of unified understanding on what is expected from the civil society in their role to support the enforcement institutions through the provision of evidence or witness accounts during prosecution, and the response from Ghanaian law enforcement authorities to use the civil society voice for fighting better against corruption, appears to be the “missing link” in the whole ARAP. Although there is a common and mutual interest for tackling corruption cases from the institutional supply and the civil demand, ARAP was mainly considered by implementing partners and beneficiaries as a means to strengthen the institutional and civic dynamics rather than an opportunity to embed concrete collaboration processes between institutions and civil society in concretely pursuing the prosecution of crimes the respect of rule of law and accountability. For instance, the social audit events of the NCCE for example have heightened the awareness of the locals to hold their duty bearers (at the district levels) to account, and in some cases engendering action against delayed projects delivery at the local levels. However, besides a few incidences, there has not been any evidence of systematic prosecution of district level duty bearers as a result of these public engagements. It is essential to mention that the social audit activities may have provided some level of evidence of knowledge of wrong doing when the locals awareness of demanding their rights was heightened. However, whether the wrongdoing is one which requires prosecution will require thorough work by the GPS/JUPOL and the OAG. This is where CSOs actions are required to go deeper and if possible provide witnesses to testify in court. As has been mentioned by the AG’s Office, that getting witnesses to testify in corruption cases is the biggest challenge. Very little civic reporting of corruption has been recorded where for *cultural* reasons reporting corruption cases is not the norm but rather the use of alternative traditional settlement platforms. This may explain why currently, the institutional complaint units are not yet optimally used by the public – especially the electronic portals. Additionally, citizenry participation all over the territory, through Star Ghana CSOs networks and NCCE raising awareness and social auditing activities, have effectively engaged citizens responsibility. However, CSO and media actions have not reflected in prosecution and asset recovery.

ARAP results and performance

The **ARAP performance** with the contribution of key partners appears also to be **largely satisfactory**. ARAP has made a strong input in institutional capacity enhancement in the area of **education, prevention and prosecution** through capacity building activities, development of the secondary policies innovative tools in each institution. However, a common methodological approach among key institutions is not yet harmonised and articulated for creating a concrete and visible link where one action leads seamlessly to the next level in the chain until the anti-corruption loop is closed. ARAP activities have helped key stakeholders to think more strategically about what corruption and accountability really means for key institutions strategy and how key institutions should cooperate among themselves and with civil society.

The major achievements of ARAP to enhancement the effectiveness of the AC institutions include the following:

- Building a coalition of civil society, law enforcement, parliamentarians and international partners to influence the OSP Bill which established the Office of the Special Prosecutor (OSP) in 2018;
- Upgrading investigations capability and developing SOPs, Guidelines and Manuals – the first time since independence of the country - for the police, which are being adopted as standard across Ghanaian law enforcement agencies particularly through



incorporating it in the police academy for all new entrants to understand before they start work as police officers;

- Establishing the 2018 and 2019 Practice Directions for the judiciary which set the rules for court procedures, enabling improved trial management of financial crime and corruption cases; as well as training **all** judges all over the country in using the new procedures;
- Empowering women users of health facilities in Northern Ghana to challenge illicit payments with a group of CSOs under the lead of Community Development Alliance (CDA);
- Supporting state-civil society coalitions such as the work of the Africa Centre for Energy Policy (ACEP) with the Ministry of Energy and the private sector. This improved performance of oil and gas contracts, including securing two new discoveries and recovery of \$1.57m from defaulting oil companies by the Ghana Revenue Authority (GRA).
- Empowering citizens to demand local level duty bearers to account, through social audits

However, much remains to be done by the government of Ghana, in order to consolidate the achievements and fully embed operations, particularly at local (regional and district) levels. The evaluators are of the view that a mutual and common comprehension of a problem driven approach among key stakeholders for designing and operating a results framework for tracking and prosecuting corruption cases may be something to consider in the future. The accountability mechanisms put in place through the complaint Units need to be fully effective in order for those institutional mechanisms to make the needed distinction between petty corruption as administrative misdemeanour and grand corruption / crime, with a focus on prosecution and court proceedings.

In parallel, Civil society policy advocacy initiatives as well as NCCE citizen awareness and social audits have proven to be effective. However those activities remain dispersed and have may need to be leveraged in a way to enhance larger civil society and citizens voice movement on the need for accountability and rule of law and governmental transparency.

ARAP Process approach

The ARAP decentralised management modalities within FIIAP, Star Ghana and NCCE created an adequate incentive providing the 'right mix' of operational, institutional and financial support to ensure an effective mainstreaming of the overall strategy of ARAP aligned on key expected results, to measure and adjust the ARAP progress in partnership with the key Ghanaian stakeholders. The overall management process based on the key stakeholders' views on how to better address their needs against the ARAP objectives, the continuous and frequent communications with the all implementing partners (FIIAP, NCCE and star Ghana) through Coordination Unit meetings, Steering Committee (SC) meetings, the 2018 and as well as the 2019 Annual Retreats have proven to be an effective approach which ensured key stakeholders support and buy-in. The ARAP management has created a ground for fostering both '*horizontal*' and "*vertical*" cooperation among key stakeholders' institutions at national level with information trickling down to the regions and district levels. Given the number of long and short-term human resources against the enormous amount of activities and outputs produced by NCCE, Star Ghana and FIIAP, it can be said that ARAP is cost effective. The visibility of FIIAP actions through social media and events, the Ad hoc partnerships made with other donors (GIZ with the Ghana Police and UK-FCDO with STAAC programme) as well as the documentation and capitalisation of the contributions of actions implemented by Star Ghana, NCCE and FIIAP have contributed to a more widespread and strategic use of ARAP measures in Ghana.

ARAP Impact

The ARAP made a significant contribution towards fight against corruption in Ghana in the sense ARAP has also created institutional buy-in on anti-corruption and accountability methodological approach. The IT-based platforms and system, the Legal Web Library Strategies and Action plans, training used by the targeted institutions are clearly a sign of steps taken towards institutional change. The citizens now avail of several instruments and channels where they can denounce,



complain, and report wrong doing or potential corruption cases. In parallel, public advocacy, public outreach and awareness activities are clearly already impacting on attitudes and knowledge concerning corruption, and provide the information needed for citizens to demand accountability.

ARAP Sustainability

The institutional and civil society buy-in appears high as well as the official position of government. However the ARAP achievements are mainly technical outcomes on the institutional capacity building and civic awareness. With regards to government official engagement and support the week-long activities focusing on the fight against corruption – which has become a regular event - are fully funded and supported by the government. Additionally, the Institutions undertook to allocate internal budget lines for the sustainability of the deliverables of the Programme. It is the view of the evaluators that these should contribute towards sustainability of the ARAP outcomes.

The ARAP outreach through Star Ghana, NCCE and FIIAP has raised awareness but no real change in the civil society perception of the confidence on the public institutions to fight the crimes in sustainable way.

Summary of conclusions

Considering the overall outcome of the programme, it can be said that the ARAP programme has indeed contributed to building the capacity of the institutions to undertake their core mandate in investigations and prosecution of corruption and environmental crimes. Also the programme has contributed to bringing, CSOs and citizens action to sustain pressure on duty bearers to do what is right.

It is too early however, to conclude that these ARAP institutional and accountability measures have contributed to increasing the risk of corrupt behaviour (at impact level) and the programme has not systematically collected evidence of this. The ARAP strong programme management abilities, have been key to gaining traction in the field of anti-corruption institutional reform in Ghana, by focusing on local solutions to locally-identified problems, ARAP has built ownership of reforms. ARAP has invested in coalitions of CSOs that could carry the momentum going forward; both between state institutions and between state and civil society.

At this stage the evaluation team can only appreciate the magnitude of the actions taken by the ARAP programme in Ghana to serve as a building block for future actions that will lead to prosecution and adjudication corruption,

In essence, the overall conclusions across the different clusters of evaluation identified (strategic relevance, coherence between the KRA, the ARAP performance and the ARAP process approach) are summarised as follows:

1. ARAP aligned with Ghanaian government policies, was a direct response of the Ghanaian immediate institutional and civil society evolving needs.
2. The ARAP holistic intervention logic is a valuable entry point for more sophisticated approach dealing concretely with criminal cases.
3. Limited evidence on consistency of action between civil society *demand* strategy and institutional *supply* mechanisms.
4. ARAP activities have had positive development in each institution, but they are a large-scale experiment for the first time that should be consolidated into one formal common cohesive plan shared and used by key stakeholders in order to set up a methodological process along the accountability chain.
5. ARAP activities are effective but there is not yet a formal and common mechanism to document shared experiences and lessons learned across actors and specific sectors. Nor is there any monitoring of specific sectors identified as potential hot-spot crime areas such as public procurement or natural resources exploitation.



6. ARAP intervention is not yet optimally translated into systematic evidence-based documentation that is able to help professionals to document criminal cases.
7. ARAP is well managed and represent good value for money.
8. The ARAP output have been largely achieved, but the full ARAP potential remains under-utilised to set up a results framework to track the performance of the concrete cases of corruption.

Recommendations

Based on the conclusions above, the evaluation team presents the following recommendations:

1. Continue to support the Ghanaian efforts on accountability rule of law and anti-corruption by using the ARAP baseline and ARAP lessons learned

This recommendation could be implemented through the following measures:

- Identify and engage a strong political support for the future programme for facilitating coordination and joint actions among stakeholders. In this sense, with the High-Level Implementation Committee (HILIC) of NACAP can be considered;
- Use a longer inception phase to make an accurate Political Economy Analysis, to complete Stakeholder Mapping involved in specific sector;
- Develop of a joint Theory of Change (TOC) down to specific sector to identify a concrete goal joint plan among institutional stakeholders in order to make a more visible palpable impact during the implementation period;
- Distribute the EU funds towards the institutional stakeholders according to their pro-activity, actual engagement, use if ARAP results and alignment with the programme principles (coordination, joint work, etc.);
- Follow up on ARAP baseline created for identifying the content of the future support.

2. Define more realistic and concrete ambitions to fight against corruption. Use pilot approach on specific sector such as environmental governance and/or public sector procurement to identify specific & concrete issues in order to define a comprehensive problem driven approach

This recommendation could be implemented through the following measures:

- Take into account the sectoral issues as the point of departure for elaborating a realistic and inclusive strategy and agenda.
- Continue to empower key stakeholders and civil society under specific sectoral perspectives (environmental, procurement issues) rather than general institutional needs.
- Use more qualitative approach of trainings and set up a pool of TOT in specific sectors in environmental governance/ procurement.
- Set a results framework on specific sector to track the keys institutions performance paying attention to their links, strengths and weaknesses.



3. Focus on Judicial and prosecution and court proceedings for supporting a cohesive framework rather than policies, strategies, for tackling Grand Corruption cases rather than petty corruption which is mainly considered as an administrative misdemeanour and not prosecuted.

This recommendation could be implemented through the following measures:

- Add key elements such as detection and recovery of assets management to close the loop looking at the whole chain (access to information, detection, reporting, investigation, prosecution, adjudication and recovery of assets) (i.e. For ex: FIC, GRA, RGD).
- Continue to support the joint work between prosecutors and investigators, or joining awareness raising campaigns.
- Create a specialized body of prosecutors on environment governance and/or procurement.
- Build sectoral cohesive anti- corruption and accountability framework on specific sectors for creating legal & judicial precedent.

4. Work jointly on concrete cases using various perspectives, for creating coherence into Ghanaian puzzle

This recommendation could be implemented through the following measures:

- Work jointly in a coordinated manner on the specific sectoral issues with key stakeholders towards specific goals for creating a sense of unity, a common understanding with shared values, principles and methodology.
- Develop jointly with key stakeholders a comprehensive and holistic approach on sectoral issues looking at the whole chain (access to information, detection, reporting, investigation, prosecution, adjudication and recovery of assets) in particularly at the links and interactions among institutions. More collaboration amongst duty bearers is critical in order to define a process rather than platform of collaboration.
- Develop joint actions and roll out a more determined result-oriented interventions at national regional and local levels to ensure that capacitated skills (institutional and professional) revision of policies, strategies, action plans, development of guidelines, SOPs and manuals is being effectively used to curb corruption.
- Use various skills for finalising and optimally used the ARAP tools (i.e. concerted action is requested drone to officer to work in collaboration with legal officer to identify actual needs for court evidence; the digitalisation process Legal web library should be finalised in collaboration with legal expert.
- Connect the ARAP tools (unit complaint) linking to the other existing tools such as the Ghanaian tracking system.
- Enlarge the collaboration with the private sector (e.g. natural resources industry).

5. Bridge the gap between the demand and supply dichotomy

This recommendation could be implemented through the following measures:

- Develop common specific education/prevention and prosecution actions focusing on specific sector under the mandate of each key stakeholder institution.
- Launch a reflexion with CSOs on how to hold duty bearers into account in environmental governance ;
- Promote gradual alignment of public outreach (state and institutions campaigns) with civil society awareness to generate more common and specific messages, and a sense of belonging to fight against one phenomenon. Citizens need to know what to do, why they do it, what institutions to contact and who is in charge of what in specific areas).
- Promote one systematic and shared and visible methodological approach (e-stop shop) amongst all stakeholders to promote a common message towards citizens and to do



classification between administrative and legal cases. Develop joint access to information.

6. Continue to use the decentralised management and provide stronger mentoring and guidance to better use the potential added value of the ARAP

This recommendation could be implemented through the following measures:

- Use local expertise at the managerial level of programmes such as ARAP may bring on board to open doors more seamlessly.
- Adjust the Coordination Unit and Steering Committee functioning for ensuring that national decisions agreed with national key stakeholders take into consideration the local issues faced by local stakeholders.
- Get the Steering Committee more involved at the Higher Political level to generate a strong political support and at the operational level of project implementation for capturing better the issues faced by the local implementers at the regional/district levels and to follow up on implementation of activities.
- Follow up better intervention implemented at the regional and district levels.
- Introduce a back stopping mechanism of the implementation of tools/ methods at district & national levels for ensuring a common understanding & application of all actors.
- Launch bi-annual surveys among key stakeholders at national and local levels to understand their evolving needs.
- Use mentoring approach within key stakeholders rather than delivery of “ready-made products”.
- Take advantage of other EU donor project results e.g., investigation of corruption (STAAC-DFID); case management systems and social accountability (USAID), (GIZ) support of the police.
- Develop guidelines based on the benchmarks and the “performance criteria“ at the national and regional level against the concrete objective of the future EU support.
- Monitor the impact of the anti-corruption measures rather than the outputs/activities of the ARAP partners.
- Introduce a continuous and shared mechanism among Ghanaian stakeholders to jointly develop benchmarks and the “performance criteria“ at national /district levels against the objective.

7. Continue to expose Ghanaian stakeholders to international standards and practices on specific sector approach

This recommendation could be implemented through the following measures:

- Support peer-to-peer exchanges learning experience and organisation of international exchanges in specific sector.
- Strengthen the sectoral dimension by including specific benchmarks linked to the international practices.



1 INTRODUCTION

The European Delegation in Ghana commissioned an evaluation team from GFA, consisting of experts in governance and evaluation, to undertake a final evaluation of the EU Programme named "Accountability, Rule of Law and Anti-corruption Programme" (ARAP). The ARAP programme with a total of EUR 20 million ran from 29 January 2016 to 29 January 2021. The evaluation took place between March and June 2021. In accordance with the TOR, the main objectives of this evaluation are to provide the relevant services of the European Union, and the interested stakeholders with:

- **an overall independent assessment of the past performance** of the project "Mobilizing Civil Society Support for Implementation of the African Governance Architecture", paying particular attention to its results measured against its expected objectives; and the reasons underpinning such results.
- **key lessons learned, conclusions and related recommendations** in order to improve current and future Interventions.

1.1 Temporal, geographic and thematic Scope of ARAP Evaluation

This evaluation focuses on the period 2016-2021. It is important to note that the reasoning behind this specific **temporal focus** is to emphasise the importance of 2021 as the year of the post Cotonou period in which the ARAP recommendations will be inscribed to improve future interventions in those areas.

As stated in the TORs, the **thematic scope** of the evaluation encompasses accountability rule of law and anti-corruption in all over the territory of Ghana. The importance of **context-specific factors within** the involved institutions (the Commission for Human Rights and Administrative Justice (CHRAJ), the Ghana Police Service (GPS), the Judicial Service of Ghana (JS), the Office of the Attorney General (OAG), the National Commission for Civic Education (NCCE). Legal Aid Commission (LAC), the Environmental Protection Agency (EPA), Economic and Organised Crime Office (EOCO) under KRA 2 and civil society (CSOs, Media, parliament under the KRA1), have been taken into consideration in programme contribution to assess the ARAP's observed changes, developments, and trends.

This evaluation focuses also on **Theory of Change (TOC)** in the logical hierarchy of expected outputs, outcomes and impacts. It's based on the TOC approach using these five OECD/DAC criteria. The design of the programme and the modalities of ARAP management within ARAP's three implementing partners (FIIAPP Delegation Agreement, NCCE Grant Agreement, STAR Ghana Delegation Agreement) have been also considered against Ghanaian institutional, operational and legal context.

1.2 Structure of the final report

The present Final Report is divided in **six chapters**:

1. Chapter 1 is the introduction;
2. Chapter 2 presents the ARAP key stakeholders;
3. Chapter 3 presents the main features of the methodological approach as well as the challenges and limitations of the methodological approach in the COVID-19 context;
4. Chapter 4 provides an overview and the detailed answer to each of the evaluation questions;
5. Chapter 5 summarises the main conclusions and presents recommendations
6. Chapter 6 presents the annexes



2 THE OPERATING ENVIRONMENT OF ARAP KEY STAKEHOLDERS

The ARAP was involved with multiple stakeholders in order to create an enabling environment for accountability and anti-corruption measures through the enforcement of rule of law. Eight institutions were directly involved in this programme as well as the civil society organisations, media and Parliament to support national efforts tackling the complexity of the anti-corruption and accountability chain.

The identified institutions most relevant in preventing and combating corruption in Ghana are the Commission on Human Rights and Administrative Justice (CHRAJ), the Economic and Organized Crime in addition to the Ghana Police Criminal Investigation Department (CID), the Judicial Services and the Office of Attorney General. The analysis of the key stakeholders' mandates demonstrate that they have differences in their nature, composition and mandates but all of them have a key role for preventing and investigating, and prosecuting corruption related crimes as well as human rights issues and they complement each other in the accountability and anti-corruption chain. However, from the documents reviewed, the coordination among the direct stakeholders based on their mandate, is not explicit through the programme design, nor in operational matters despite some cooperation and collaboration between some institutions.

The ARAP design is based on traditional approach of key institutions capacity building, in order to carry out their mandate and increased engagement of civil society, media and members of the Parliament on the implementation of anti-corruption and environmental governance, in addition to institutional & legal framework. There is an assumption within ARAP programme design that the emphasis on direct and indirect stakeholders individual capacity strengthening will serve as **a mechanism for dialogue/collaboration between stakeholders** and will tackle the common concern of accountability and anti-corruption for implementing an integrated and comprehensive approach at local (district) and national levels.

It is essential to note that in Ghana, **all** the anticorruption institutions are at the same level (no hierarchical order per se). Each institution plays its role as defined by its enabling Law/Act. When specific acts of financial crimes, fraud, corruption or accountability issues are detected and reported, the relevant institution follows their mandate to investigate the offence. Operationally, some are proactive (take action when a corrupt act is detected) while others are reactive (take action long after corruption has taken place)¹. This operational mechanism makes a horizontal approach rather than a hierarchical one from detection and reporting a crime, investigating the crime and prosecution and adjudication including asset recovery. The Attorney-General comes in at the stage of prosecution. Also the Attorney General has given a fiat to specific institutions to prosecute cases within their jurisdiction. The Attorney General has the sole constitutional mandate to prosecute all criminal cases in Ghana.

The complexity of the stakeholders as put together under ARAP, is the fact that some of them have their mandate carved out within the constitution of Ghana with "specifics" in terms of tasks, who they can or not collaborate with and how e.g. Judicial Service – making flexibility a daunting task. Other institutions were established by "lesser" Laws/Acts making them more adaptable and flexible than others, to go with the ARAP flow.

The table below categorises the direct and indirect stakeholders according to their main features.

¹ Former ED of the Serious Fraud Office



Table 1: Categorisation of the direct and indirect ARAP stakeholders according to their main features

Institution	Stakeholder Analysis	Specific Mandate
Direct Stakeholders		
Commission for Human Rights and Administrative Justice (CHRAJ)	<p>The CHRAJ is the main body responsible for anti-corruption efforts and for overseeing the coordination and implementation of the NACAP (art. 218 of the Constitution, which made provision for Act 456 of 1993 establishing the CHRAJ). The NACAP was developed following a gap analysis and widely held consultations. The NACAP's institutional and implementation arrangements are the High-Level Implementation Committee, the Monitoring and Evaluation Committee and the Implementation Support Unit under the CHRAJ</p> <p>Unlike other anti-corruption bodies, CHRAJ's institutional and operational independence is protected under the Constitution (Art. 225). The President appoints members of the CHRAJ in consultation with the Council of State (arts. 70 and 217). CHRAJ is primarily responsible to investigate and report cases of corruption, abuse of power and unfair treatment by public officials. CHRAJ is designed to ensure the realization of fundamental human rights and freedoms in Ghana; to combat corruption and conflict of interest and provide an avenue for redress for administrative justice infractions.</p>	Detecting, preventing and investigating corruption related crimes, and human rights. Does not carry out investigations directly. Works with the GPS in investigating corruption of crimes
Ghana Police Service (GPS)	<p>The Ghana Police Service (GPS) is the primary law enforcement agency for the country. Its history dates back to 1821 with the introduction of professional policing. Working under the Ministry of Interior, its primary focus is on crime prevention and detection, as well as the apprehension and prosecution of offenders. GPS is a crucial actor within Ghana's anti-corruption chain, as one of the main investigating and prosecuting agencies. The CID (criminal investigation department) is one which works with other AC agencies (e.g. CHRAJ, EOCO, FIC, etc.) or called upon to investigate crimes of all types including corruption cases.</p>	Detecting, preventing, investigating and prosecuting (fiat from AG's Office) all crimes in the country.
Judicial service of Ghana (JS)	<p>The Judicial Service (JS) of Ghana is an independent State body that has the authority to interpret, apply and enforce the laws of Ghana. It exists to resolve legal conflicts fairly and efficiently. The JS also focusses on using technology to help increase efficiency and therefore minimize opportunities for corruption. The Judiciary is the branch of government given authority to interpret, apply and enforce the laws of Ghana.</p> <p>The Judiciary is made up of the Supreme Court, the Court of Appeal, High Court and Regional Tribunals and such Lower Courts and Tribunals as Parliament may establish and shall have the Chief Justice as the Head, who shall be responsible for its administration and supervision.</p>	Adjudication of all crimes including corruption, fraud among others in Ghana
The Attorney General's Department (AGD) (Ministry of Justice)	<p>Article 88 of the 1992 Constitution establishes the Attorney General as the principal legal advisor to Government.</p> <p>The AG's Office exists to oversee an efficient and transparent legal system and helps ensure that all citizens have equality of access to justice. This position of duty means that any civil proceedings against the State can be brought against the Attorney General as a Defendant.</p>	



Institution	Stakeholder Analysis	Specific Mandate
Environmental Protection Agency (EPA)	<p>The Environmental Protection Agency (EPA) was established in 1994 to improve and protect Ghana's environment, oversee the implementation of the National Environment Policy. With offices throughout the country, it is the public body responsible for planning, managing and regulating all environment-related projects, policies and programmes. Ensuring that environmental factors are included in development strategies at national, regional, district and community levels is central to the EPA's work. EPA also helps to lead the programmes' awareness campaigns to prevent illegal and unsafe practices that contribute to the degradation of the environment e.g. illegal mining among others.</p>	<p>Detects, prevents, investigates, prosecutes environmental crimes</p>
National Commission for Civic Education (NCCE)	<p>The National Commission for Civic Education (NCCE) is an independent governance institution as established under the 1992 Fourth Republican Constitution of Ghana. It began to operate in April, 1994 after the First Parliament of the Fourth Republic passed the National Commission for Civic Education Act, 1993 (Act 452). The Commission, with its Head Office in Accra, is present in all ten (10) regions and two hundred and sixteen (216) districts in Ghana file:///Users/stellaattakpah/Downloads/Manual-2018.pdf . The NCCE works to promote and sustain democracy and inculcate in the Ghanaian citizenry, the awareness of their rights and obligations, through civic education https://www.nccegh.org/page/about-us.</p>	<p>promote and sustain democracy of the rights and obligations of the people, through civic education, including understanding and holding public officials to account</p>
Indirect Stakeholders		
Legal Aid Commission (LAC)	<p>In 1997, Ghana's Legal Aid Scheme (LAS) was created to ensure that all citizens have equal access to justice as well as equal treatment before the law. Its mandate is to ensure the achievement of a just and equitable society by providing nationwide quality legal aid.</p> <p>LAS acts as a Public Defender in cases where Ghana's socially and financially disadvantaged citizens may require legal services. With a presence in all districts throughout Ghana, the LAS works to provide information for the general public to increase their understanding of the law, and the legal services they can receive. In 2018, the Legal Aid Commission Act, 2018 (Act 977) transformed the LAS into the Legal Aid Commission (LAC). Part of its duty is to encouraging citizens to file lawsuits against public officials in cases of misappropriated funds. (ref ToR)</p>	<p>Acts as a Public Defender for the socially and financially disadvantaged and encouraging citizens to file lawsuits against public officials in cases of misappropriated funds.</p>



Institution	Stakeholder Analysis	Specific Mandate
<p>Economic and Organised Crime Office (EOCO)</p>	<p>ACT (2010) established the Economic and Organised Crime Office as a specialised agency to monitor and investigate economic and organised crime and on the authority of the Attorney-General prosecute these offences to recover the proceeds of crime and provide for related matters. The objects of the Office are to (a) prevent and detect organised crime, and (b) generally to facilitate the confiscation of the proceeds of crime. Functions of the Office 3. The functions of the Office are to (a) investigate and on the authority of the Attorney-General prosecute serious offences that involve (i) financial or economic loss to the Republic or any State entity or institution in which the State has financial interest, (ii) money laundering, (iii) human trafficking, (iv) prohibited cyber activity, (v) tax fraud, and (vi) other serious offences; (b) recover the proceeds of crime; (c) monitor activities connected with the offences specified in paragraph (a) to detect correlative crimes; (d) take reasonable measures necessary to prevent the commission of crimes specified in paragraph (a) and their correlative offences; (e) disseminate information gathered in the course of investigation to law enforcement agencies, other appropriate public agencies and other persons the Office considers appropriate in connection with the offences specified in paragraph (a); (f) co-operate with relevant foreign or international agencies in furtherance of this Act; and (g) perform any other functions connected with the objects of the Office https://www.mint.gov.gh/wp-content/uploads/2017/06/EOCO-Act-804.pdf</p>	<p>investigate and on the authority of the Attorney-General prosecute serious offences that involve (i) financial or economic loss to the Republic or any State entity or institution in which the State has financial interest, (ii) money laundering, (iii) human trafficking, (iv) prohibited cyber activity, (v) tax fraud, and (vi) other serious offences; (b) recover the proceeds of crime; (c) monitor activities connected with the offences specified in paragraph (a) to detect correlative crimes; (d) take reasonable measures necessary to prevent the commission of crimes specified in paragraph (a) and their correlative offences; (e) disseminate information gathered in the course of investigation to law enforcement agencies, other appropriate public agencies and other persons the Office considers appropriate in connection with the offences specified in paragraph (a); (f) co-operate with relevant foreign or international agencies in furtherance of this Act; and (g) perform any other functions connected with the objects of the Office</p>
<p>Civil Society, Media and Parliament STAR Ghana Foundation (UK-FCDO Project)</p>	<p>Civil society organizations are relatively well-established and with a good number of policy think-tanks as well as local organizations. The media space remains one of the most vocal in the region, but with a degree of self-censorship and other informal constraints. There are regular indications of subtle threats when media, most often progressive radio- and web-based media, report on corruption.</p>	<p>Hold duty bearers to account, push government to investigate and prosecute serious including corruption offences</p>



4 FINDINGS

4.1 Relevance

EQ1. To what extent has this ARAP programme responded to the institutions and civil society needs in particular on anti-corruption, accountability and rule of law, as well as environmental governance issues in Ghana?

JC.1.1. The project interventions been tailored against the evolving context? Are ARAP objectives and KRAs set in a realistic manner? Have all relevant circumstances and risks been taken into account to the project intervention logic?

The Programme was strongly aligned with the objectives and priorities of the EU in relation to its Ghana country strategy as well as in relation to the National Indicative Programme (NIP) for Ghana, covering EU support to Ghana under the 11th EDF (2014-2020). The intervention logic are directly aligned with Ghanaian Government strategy, requiring a quick response and a comprehensive and integrated approach.

The **design of the ARAP** Programme was in response to anti-corruption needs and priorities as it related to the Ghanaian context particularly, to enhance the skills of both relevant public sector institutions, civil society organizations and the citizenry. Most importantly, at the time of formulation, Ghana had also adopted the National Anti-Corruption Action Plan (NACAP), intended to be the overarching strategy for all anti-corruption³ tool engaging relevant key stakeholders, with CHRAJ as the “custodian⁴” of the NACAP. While FIIAPP was engaged with institutional and professional capacity building NCCE provided public education responses, and STAR Ghana supporting relevant civil society and media organisations through advocacy.

The design of ARAP was based on the use of a ‘theory of change’ (TOC), with ambitious outcomes aligned with national commitments. However, the ARAP design did not examine the socio-economic realities, institutions’ current state of play, and the context within which civil society and institutions operates. Specifically, the complexity of related issues on demand and supply and institutional and operational context of key stakeholders were not fully assessed during the design of the ARAP design. ARAP expected outcome was too vague (*to reduce corruption and improve compliance with the rule of law*) unrealistic given the limited information on key stakeholders practices, the lack of coordination among key stakeholders, the socio-economic hurdles, and the programme time frame required to change rooted behaviour.

JC.1.2. Is the project adapted to the present institutional, human, financial capacities of institutional stakeholder(s) and civil society needs

The overall intervention logic was relevant to address at the same time the immediate needs of institutions and civil society but also to address the long term approach of the accountability chain for creating an enabling environment among the key stakeholders:

- The consideration of each key stakeholder mandate, roles and their potential complementarity was important to respond to their immediate institutional needs as well as to for fighting against corruption.
- ARAP is a very unique programme and the first of its kind to attempt a holistic approach to fighting corruption, restoring accountability and rule of law and environmental governance, in the country through a three-pronged approach using FIIAPP for enhancing public institution’s ability to enforce anti-corruption laws; STAR-Ghana as facilitator of relevant

³ Mid Term Evaluation Report 2019

⁴ Ebid



CSOs to not only raise awareness but use the media to push duty-bearers to account as well as relevant policy and legislative reforms. For the first time in the country, ARAP sought to bring about a holistic approach tailored to public institutions and civil society actor's needs, for creating a common understanding of interrelated issues.

JC1.3. Are baselines for achieving ARAP progress available in each key institution?

There is no evidence-based documentation and knowledge on accountability anti-corruption system put in place at the beginning of the programme. The original LFM did not take into consideration the lack of baseline values and limited capacities of the targeted institutions to collect and report data concerning their performance. The initial log frame has been modified during the ARAP implementation according the mid-term evaluation for creating a baseline value for those institutions and for assessing the progress of key institutions at the end of the programme. The new set of proposed indicators selected intends to capture the ARAP improvements considering that the institutional capacity, the innovative tools established can be considered as the baseline to draw from. Consequently, the initial key result areas from the initial (2) KRAs were readjusted into three (3) to respond better to the ground as follows:

KRA1 – Improved compliance and respect of the Rule of Law⁵

The assumption here is that if ARAP capacitated institutions through production and dissemination of policies and procedures; provision of IT tools such as e-platforms as well as professional capacity enhancement of prosecutors and judges, this would contribute to the specific objective of this KRA;

KRA2 – Enhanced accountability across key AC institutions and other public institutions⁶

The assumption under this KRA is that if assistance is provided to CHRAJ and institutions reporting on NACAP including CSOs, CHRAJ will be capacitated to investigate systemic corruption in public institutions; with an increase in professional skills development of GPS officers who would in turn train their peers; coupled with a heightened public awareness through the use of social media, Public Educational (PE) events / activities/ campaigns and the facilitation of easy access and user-friendly public complaint / report-a-crime units at various public institutions (GPS, EOCO, JS, EPA...) should result in the achievement of this KRA which is a reduction in corruption and Environmental Governance compliance monitoring.

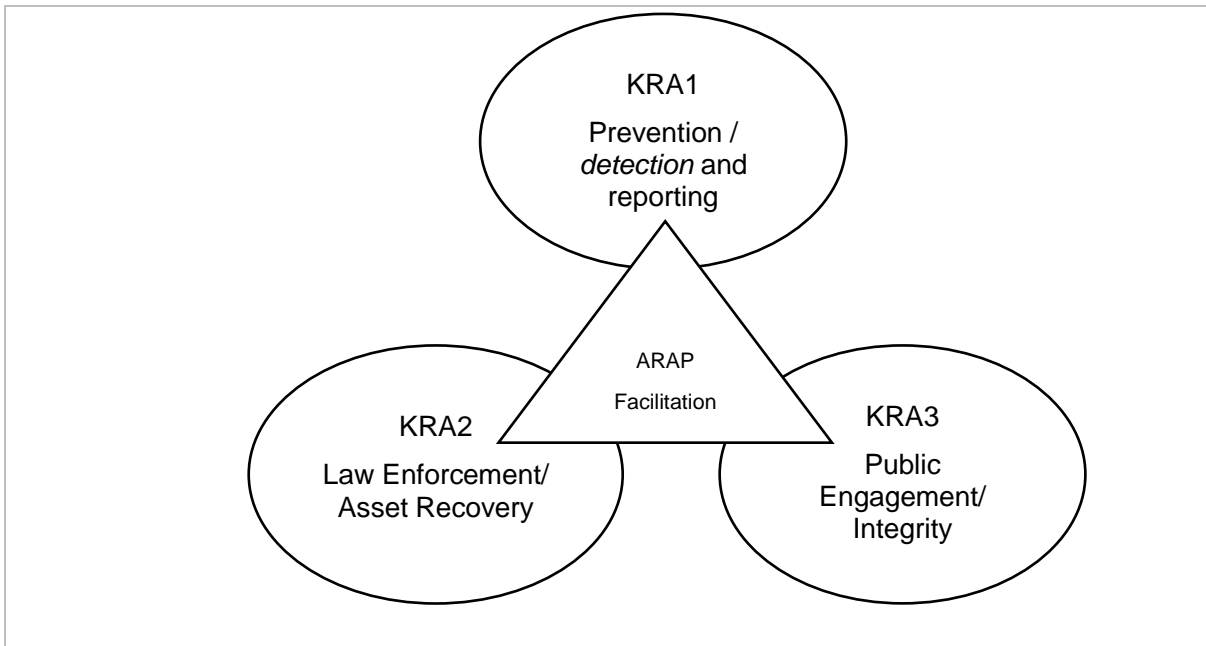
KRA 3 – Key AC institutions acquire increased capacity to combat corruption⁷.

The assumption here is that through advocacy, more complaints are lodged with capacitated Enforcement Agencies who are able to process a higher amount of complaints that should result in redress, including investigation, prosecution/adjudication and asset forfeiture and recovery (AG's Office and EOCO), while ensuring that cases of police misconduct are resolved compared to the number of complaints received. And finally, that institutions have work across the aisle with non-traditional partners, peers and international partners through relationship building in order to address a common issue.

⁵ ARAP Logframe 2020

⁶ IBID

⁷ IBID



JC1.4. Do all key ARAP stakeholders still demonstrate effective commitment (ownership)?

The flexibility of the intervention logic within the direct involvement of targeted institutions proved to be a relevant approach which ensured institutional support and buy-in. The e-survey results (see figure 4) confirm that key stakeholders were engaged by requesting the assistance and by providing their views on how to better address the needs. ARAP is still perceived by the beneficiaries as agreed upon sets of actions which have contributed to their needs rather than to be as donor' imposed interventions.

How would you classify the ARAP support in relation to the institutional needs of the stakeholders?
11 responses

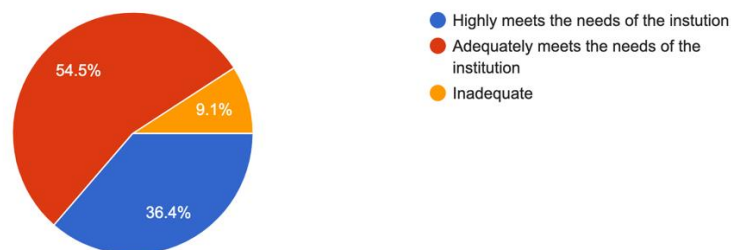


Figure 4: ARAP stakeholders survey results

4.2 Coherence

EQ2. How and to what extent has the project contributed to fostering collaboration/ joint practices between institutions and consistent civil society demands/strategy?

JC2.1 Coherence /Coordination/ complementarity between FIIAPP, STAR GHANA and NCCE interventions?

The relative attempt by ARAP to adopt a holistic approach under the *supply* and *demand* method has resulted in a fragmentation of activities undertaken by the different implementing partners at different levels. Even though there were meetings on a regular basis at the level of the steering committee to share information on activities undertaken under each key result area (KRA), there is



limited evidence on consistency of **demand** and **supply** linkage that closed the anti-corruption chain from detection, reporting through to prosecution, adjudication and asset recovery.

The three-pronged strategy adopted by the ARAP in response to the Ghanaian priority to tackling crime through **education, prevention** and **enforcement** (investigation and prosecution) is a novelty in the sense that the **education** part of the approach added much value to the Ghanaian system of “detection-investigation-prosecution”. However, in pursuit of a demand and supply approach to dealing with corruption, respect for rule of law and accountability, it is not evident that the three pronged approach adopted by the implementing partners– FIIAPP, UK-FCDO STAR-Ghana and NCCE approaches worked as a single organic ensemble. The trio seemed more to have worked in isolation with occasional Coordination Unit meetings where information and experiences are shared on activities and actions carried out during the previous months. The implementing partners did not lend themselves to seamless work along the anti-corruption chain from detection/prevention/reporting – to investigation/compliance/rule of law – to prosecution and adjudication and asset recovery.

While the overall approach of FIIAPP’s component is based on the model of Enforcement, Prevention and Education⁸, the STAR-Ghana component was based on Advocacy and lobbying parliament, policy and decision-makers to enact or change policies, practices and provision of better service delivery devoid of “rent” (illicit payments) collection at community levels. The NCCE intervention model was more of a human rights based approach, through **civic education** and **social auditing** for improved citizenry knowledge of local level accountability structures and how to demand their rights for what is due them (by their district assemblies), through **social auditing events**.

Despite the importance of the implementing partners’ interventions, there was little evidence of collaboration between civil society and key stakeholders. The understanding of ARAP was mainly considered as a means to strengthen the capacity of institutions and internal dynamics of the civil society rather than an opportunity to strengthen the civil society voice in supporting institutional changes by using the complaints units and promoting the meaningful and structured participation of civil society in the detection of crimes, bringing evidence and testimony (witnesses) during prosecutions. The relative absence of a unified understanding between CSOs and citizens on what is expected from the civil society to sustain the pressure on the rule of law and accountability, as well as what is expected from Ghanaian accountability institutions to facilitate the processes for civil society voice in fighting better against corruption and building a critical mass (the public) to sustain the effort, appears as the “missing link” in the whole ARAP strategy. There may be need for more deeper coordinated action for understanding that all are fighting against a single “enemy” (corruption) with CSO and citizen engagements sustaining pressure until the anti-corruption institutions play their part through detection, investigation, prosecution and adjudication.

JC.2.2 Coherence /Coordination/ complementarity among key institutions actions?

FIIAPP in its approach played the role of a facilitator on building new bridges of cooperation among key stakeholder institutions and exposing the key stakeholders to recognized international standards and practices. All interviewees have underlined that ARAP has facilitated the interactions among institutions (see Figure 5). The dynamic of the FIIAPP intervention logic through the Coordination Unit has created a ground for fostering both ‘horizontal’ and vertical co-operation among key stakeholder institutions as follows

- At national level, the annual public education working group was set up among key stakeholders;
- 11 MoU on information exchange and collaboration between national institutions in combating corruption and crime have been established and signed among the relevant institutions.

⁸ ARAP Final Internal Evaluation (FIIAPP Component), 2021



- Joint capacity work have facilitated a dynamic that has leveraged a diversity of Ad Hoc partnerships and inter- institutional coordination among stakeholders (i.e. the Collaboration on capacity building on disclosure of evidence for OAG and GPS, the Joint work between EPA and OAG, collaboration between NCCE - EPA - GPS raise the awareness of the public in relation to accountability, corruption crimes in general and environmental crimes in particular etc.
- Joint trainings putting together OAG, GPS, EPA and the JS, Judges etc.

Joint activities among institutions have also expanded beyond the national borders to expose the key stakeholders to the international practices. However, exchange of information does not mean continuous collaboration and above all, the stakeholders joint actions remain characterised by a low level of joint cooperation that lead from detection/reporting at one institution, followed by appropriate actions at the various other institutions e.g. detection-reporting (complaint units)-investigations-prosecution-adjudication.

Has the ARAP programme provided the space for adequate coordination and complementarities as well as mechanisms that are adequate for your institution to collaborate with other key institutions?
11 responses

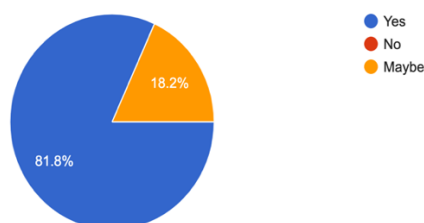


Figure 5: ARAP stakeholders survey results

4.3 Effectiveness (results)

EQ.3.To what extent have raising awareness and capacity building activities contributed to empowering and enabling Institutions and citizens towards enforcement of anti-corruption measures, rule of law and accountability in Ghana, as well as the extent to which the ARAP three components met the objectives of the programme.

J3.1.Do the project activities effectively support the KRAs? Are key stakeholders acquiring the necessary institutional, legal and human capacities?

The ARAP programme is effective in the sense that it considered corruption and corruption related activities, in all its forms and facets and undertook to implement a broad range of activities in various fields that lend themselves to enhancing the capacity of stakeholder institutions to deal with corruption or corruption related issues in line with the needs of the country under a **demand** and **supply** approach. On the demand side the assumption was for capacitated CSOs, citizens and the media to demand and hold duty-bearers to account while on the **supply** side, capacitated anti-corruption institutions are able to tackle corruption issues, compliance and respect for rule of law. Overall the ARAP process contributed to a large extent in achieving the expected outcomes by delivering a key set of outputs.

FIIAPP

The FIIAPP actions centred on mainly on **prevention, education and prosecution** activities has supported the institutional functioning. The magnitude of activities on institutional and professional capacity building, communication aspects through the provision of IT tools, review and establishment of secondary legislation (strategies, operational manuals) and provision of basic tools, the



use of which enhanced the capacity of the target institutions. In essence, between 2016 and January 2020, the FIIAPP component undertook a total of 326 activities delivered by about 65 long and short-term experts for 11,248 participants (7478 males/ 3670 female)⁹ across the various stakeholder institutions (GPS, AGO, JS, CHRAJ, NCCE, LAC, EOCO, EPA), regional offices and district level agencies (Ashanti 29; Bono 2; Central 8; Eastern 35; Greater Accra 144; Northern 16; Upper East 2; Volta 4; Western 3) as well as relevant CSOs across the country.

The sheer enormity of the FIIAPP action with over 300 activities and outputs implemented, shows the commitment of the FIIAPP Team to ensure effective transfer of knowledge to the beneficiary institutions. According to interlocutors met during the field mission, all confirmed that the activities undertaken by ARAP met their basic needs without which they would not have been able to perform¹⁰ their duties.). However the evaluation team notes that improvement is not at the same level in all institutions. Most proactive institutions are as a result of personality drive within those institutions. Where the leadership is committed, there is a drive to explore the new techniques and tools and apply the ARAP methodology e.g. some management authorities have already approved and endorsed the ARAP “way of working” using the Guidelines and Manuals and SOPs as well as embedding the training manuals in the Police Detective School to be taught to all new entrants¹¹.

FIIAPP activities and outputs included the following:

CHRAJ

- Support to CHRAJ working mainly on the National Anti-Corruption Reporting Dashboard (NACoRD), an online monitoring tool for the implementation of NACAP. This consisted mainly of workshops with the NACAP stakeholders, training sessions and the provision of IT equipment to CHRAJ. ARAP through the FIIAPP component also provided training for CHRAJ investigators, in the context of CHRAJ’s plan to carry out integrity investigations in national institutions. ARAP also supported the Public Education department of CHRAJ to develop communication strategies, inform citizens about procedures to bring corruption complaints to CHRAJ, and disseminate some of the outcomes of ARAP’s work to the broader public.

GPS

- ARAP support to GPS, include training of investigators, development of Manuals and SOPs, training of police prosecutors (in consultation with the Office of the DPP, the AG and the Ministry of Justice), as well as training on pre-trial disclosure requirements. Support related to public education and communication, workshops bringing together the GPS and other stakeholders working on public and civic education. Support for online complaint systems as well as social media handles. The Ghana Police Watch series was also supported, with ARAP contributing to episodes on anti-corruption issues (while other work on the series was also supported by STAR-Ghana).

JS

- ARAP support to the JS, include the development of a web-based legal library and the decentralisation of Public Relations and Complaints Units (PRCUs) at the regional level for wider access to those in the regions, together with an innovative e-PRCU application system.

AG’s Office

- ARAP provided assistance to the Department of Public Prosecution on the development of a docket registry system (including training on its use for prosecutors and staff), and on guidelines relative to trial management (trial disclosures). ARAP also supported the development of a manual on the prosecution of environmental offenses.

⁹ ARAP (FIIAPP Component) Final Report 2016-2021

¹⁰ GPS interlocutor, April 2021

¹¹ Interview with GPS (HQ and Regional Office Accra)



LAC

- ARAP support was provided to the Legal Aid Commission for the development of a training manual on basic law and anti-corruption, which forms the basis for training LAC staff (including training of trainers). In addition, ARAP supported the development of a legal aid policy, as well as provision of IT equipment and vehicles.

EPA

- ARAP support to EPA, in addition to training of the EPA Staff in relevant areas, consisted of the development of web-based compliance monitoring tools as well as the provision of drones, to help map small-scale mining and identify possible breaches of licensing terms and other illicit activities by small-scale miners. ARAP also supported the EPA together with the DPP's office to help develop methodologies to prosecute environmental offences.

EOCO

- ARAP support to EOCO – a stakeholder which had worked previously with the Strengthening Transparency, Accountability and Anti-Corruption (STAAC) programme implemented by the UK Department for International Development (DFID)- consisted of strengthen its public education activities in order for the public to have access to a formerly closed institution. This has included the development of EOCO's client service charter (the first of its kind, for an institution within the Ministry of Justice), as well as a "face-lift" of EOCO's website.

It emerges from the evaluation, that the extent to which outputs have been made available to the target institutions by the programme, helps understand the links between the output results and the ability of the AC enforcement agencies to bring about change in the anti-corruption ecosystem of Ghana in line with the overall objective. The numerous outputs have created the basis for an articulated theory of change and can contribute towards the overall impact result within the anti-corruption ecosystem in a few years with commitment of the government of Ghana and support from donor Agencies.

It is essential to note that for the **investigation and prosecution** of corruption to happen, there is need to have a strong detection and reporting regime in the country. The evaluation team would like to highlight that the ARAP team did not include the detection component in their theory of change. However, ARAP worked in tandem with STAAC (Strengthening Action on Anti-Corruption) Project which had a very strong focus on **detection**. This collaboration which was very strong in the early years of ARAP and STAAC – with both programmes starting at the same time in 2016. Also, there is need to mention that DANIDA and USAID also provided assistance to the Ghana Government (public institutions and CSOs) in various aspects of the Accountability, Anti-corruption and Rule of Law conundrum which, based on the donor coordination meetings¹² of the early years 2016 through 2018 made it possible for all donor partners in the anti-corruption space to calibrate their activities in a way to complement each other and avoid duplication of effort.

UK-FCDO Strengthening Transparency, Accountability and Responsiveness (STAR)-Ghana II

STAR-Ghana is a UK project, pool funded¹³ by various development partners working with coalition of CSOs to bring about change in specific areas related to accountability, anti-corruption and rights based rule of law. This approach is innovative in the country and sought to strengthen horizontal and vertical linkages amongst CSOs to address systemic challenges to the fight against corruption encourage the respect for rule of law and accountability. The evaluation team notes that under STAR-Ghana (UK-FCDO) component, did not only work with CSOs, but with the private sector¹⁴

¹² Interview with first Team Leader March-April 2021

¹³ UK-FCDO Star-Ghana end of project report, 2020

¹⁴ STAR-Ghana log frame



(oil and gas; Chamber of Commerce; Pharmaceutical Associations, religious groups, etc...). STAR-Ghana worked with partner CSOs and the media with the aim to hold government to account at both the national and local levels, including when it comes to how revenues are raised and spent and how services are delivered to the people, as well as to improve their capacity and ability to **lobby** and **advocate** for increased transparency and anti-corruption efforts – particularly through CSO coalitions for sustained action – working with state partners¹⁵ such as the Ministry of Energy (ACEP) or Media Coalition against Galamsey¹⁶. This was an innovative approach to facilitating collective citizens' actions on anti-corruption and accountability issues at the local, regional and national levels; working with and between civil society organisations, including private sector associations, the media, as well as state actors at community, district and national levels.

Between October 2017 and May 2020, STAR-Ghana undertook 33 actions which resulted in an upgrade or establishment of 16 policies/practices, in the field of anti-corruption, accountability and rule of law. The theory of **change** of STAR-Ghana aims to use evidence, for example through the media, to educate and engage citizens in a sustained way, on anti-corruption issues¹⁷ and strengthen duty-bearers' accountability and responsiveness at the community levels in order to bring about change.

STAR-Ghana reported that CDA reported that evidence from their baseline studies and assessment tool combined with community and health facility engagement had motivated women users of health facilities in Northern Ghana to challenge illegal payments¹⁸. This led the Upper-East Regional Coordinating Council (RCC) agreement to make requests to Regional Health Directorate to develop and implement guidelines for checking illegal charges at health facilities, particularly for maternal health. This action is particularly important to stop "rent" collection at the lower levels of society. This activity led by the Association of Church Development Project – **ACDEP** is particularly important in the sense that it fulfils the SDG 5 (Gender Equality) and SDG 3 (Ensure healthy lives and promote well-being for all at all ages), in addition to advocacy towards the Passage of Legislative Instrument (LI) harmonising fees and other charges on pharmaceutical products, a major source of corruption in the health sector. **(led by Chamber of Pharmacy – Private Sector)**

Additionally, CSO activities led to the Minerals Development Fund (MDF) Act to be amended to provide for oversight of minerals revenue management at the local level by citizens (led by Centre for Extractives and Development Africa - **CEDA**). It is also noted that STAR-Ghana advocacy actions in collaboration with other relevant CSOs brought to live the OSP Bill of Ghana, by significantly contributing to **the passage of the RTI Bill into Law in 2019 by the Parliament of Ghana**

NCCE

NCCE led in campaigns through civic education, in partnership with other stakeholders (including the EPA, CSOs and the media) to focus, inter alia on roles and functions of government at national and local levels, on accountability issues and services to which people are entitled and how to claim their rights. NCCE also engaged in decision and budgetary-making processes, giving citizens the knowledge on how to participate in these.

NCCE worked in close collaboration with implementing partners and stakeholders (e.g. GPS, EPA) and executed over 90% of planned activities. A baseline survey at the beginning of the project served as the basis for the activities of the NCCE, while an end-line survey served as the gauge that identified that 60 per cent of Ghanaians had been reached with NCCE's public education on ARAP using a sample size of 8,672 for baseline and 4,284 for end-line.

Additionally, ARAP support to NCCE, contributed to improving knowledge of the citizenry on local level accountability structures through **social audit events** which showed an increase in 2017,

¹⁵ STAR-Ghana year 4 report, July 2020

¹⁶ IBID

¹⁷ UK-FCDO Project Coordinators interview.

¹⁸ Interview with STAR-Ghana



from 31.2% to 39% in 2020 of citizens' knowledge on local level accountability structures and the need to hold duty bearers to account.

Highlights of NCCE activities from 2017 through 2020 are mainly:

Institutional (NCCE) capacity building; Research work (baseline and end-line surveys); Awareness-raising on anti-corruption, rule of law, public accountability and good environmental governance deepened among an estimated 3,648,220 Ghanaians; and Social Accountability Platforms.

The evaluation team acknowledges that the social audit events have raised the awareness of local participants to the level where citizens are able to demand of their community leaders to account for funds received for social amenities. The outcomes of such activities/events can be said to hold true of the attainment of the accountability part of the overall objective whereby citizens are able to demand their duty bearers to account. However, it is not clear if this level of awareness is able to ensure that citizen action is able to bring defaulting community leaders to book – by way of investigation and prosecution for wrong doing.

J3.2. Does the ARAP Programme effectively support the Government of Ghana policy and actions? Are key stakeholders acquiring the necessary institutional and human capacities?

Overall ARAP performance has taken a chain-linked approach to supporting the Government of Ghana to tackle corruption

At output level in the education, investigations and prosecution/adjudication functions, ARAP sought to improve institutional capacity and understanding of their role in the anti-corruption chain. In parallel, the civil society was engaged to participate in keeping pressure on government for action against corruption. The ARAP results achieved at output level is impressive and, some of which contribute to outcome level results (see annex 5).

It is however interesting to note that the Ghana government's approach to tackling offences is based on the standard detection-investigation-prosecution and asset recovery. Asset recovery being the ultimate blow for depriving the criminal the opportunity to enjoy the proceeds of their criminal activity.

In relation to the three expected results (see the, ARAP was to contribute to current Ghanaian reform processes in the area of rule of law, accountability, anti-corruption and environmental governance through capacitation of key institutions, while at the same time increasing the ability of the public, civil society organisations and the media to hold government to account¹⁹.

4.3.1 Improved compliance and respect for the Rule of Law

The **enhanced capacities and professional skills** acquired as well as the **secondary legislation developed** by ARAP support in addition to the Strategies, Action Plans, Operational Manuals and Guidelines have already been endorsed officially by beneficiary institutions (JS, GPS, EPA, EOCO...) and being implemented (although at different pace). The documents drafted and revised with the project's support covered a wide range of institutions and affected virtually a good part of the justice, prosecutorial, and police structures, in addition to CHRAJ. For instance, the Standard Operating Procedure was developed, printed, and subsequently disseminated to all Supervising High Court Judges across the country to assist in the execution of their mandate. It cannot be over emphasized that such Strategic documents, policies, Action Plans, Guidelines/SOPs/Manuals are a crucial support on the way to contributing to the overall impact in a few years – if the Ghanaian authorities continue to execute activities as they already have started. ARAP support to EPA, in addition to training of the EPA Staff in relevant areas, consisted of the development of web-based **compliance monitoring tools** as well as the provision of drones, to help map small-scale mining and identify possible breaches of licensing terms and other illicit activities. The ARAP action also

¹⁹ *ibid*



included EPA and the office of the Director of Public Prosecution (ODPP) to help develop methodologies to prosecute environmental offences which led to joint EPA/DPP action (investigations by EPA towards prosecution by ODPP) of an environmental nature – the first of its kind but which did not lead to final prosecution²⁰. Beyond the ARAP activities, key stakeholders have adopted new strategical framework identified as critical improvement to go one step further (see table 2)

Table 2: ARAP Performance on new secondary legislation framework

ARAP Rule of Law and Accountability performance

CHRAJ Main activities

- NACoRD - NACAP Online Reporting Dashboard as the systematic measurement of progress of achievement of the strategic objectives of the NACAP; <https://nacap.chraj.gov.gh/>,
- Information Management System (IMS) for NACAP reporting with Introduction of the online National Anti-Corruption Reporting Dashboard (NACoRD), to enhance the coordination work of the CHRAJ and its stakeholders under the NACAP monitoring and reporting;
- Review and development of CHRAJ's Strategic Plan 2020-2025 & Communication Strategy;
- Set up Anti-corruption Platform with the 11 MoU signed with in anticorruption.

CHRAJ Main Achievements

- NACAP - represented a valuable entry point to build a holistic result-oriented interventions and improve coordination and joint actions among anti-corruption agencies. BUT NACAP has not yet a comprehensive problem driven approach, paying little attention to the links and does not have a results framework to track its performance.

Ghana Police Service (GPS) Main activities

- Realisation Police Service Instructions Manual;
- Realisation Police Gender Strategy;
- Development of Police Communication Public Education Strategy on How the “Communicating with Communities” ;
- Development of GPS Social Media Strategy.
- Development of a the Petition Management System (PMS).
- **GPS Main Achievements**
- This digitalized system of registering and monitoring complaints was designed to digitally incorporate the work processes, books, registries and forms used by personnel of the Police Professional Standards Bureau (PPSB) in the course of their duties
- The GPS Service Instructions Manual service is the first which give specific instruction on “How” for corruption cases . The GPS manual was distributed to all police stations in Ghana was officially adopted in Police Service training Police Officers trainees

Judiciary and the Judicial Service Main activities

- Establishment of Web-Based Library (ghanalegalweblibrary.net) to facilitate easy access to legislation, judicial decisions and supporting rules and regulations and judicial commentaries as well as access to international law related materials, including all the treaties to which Ghana is a party, information on international courts Eurolex and contents from the Commonwealth Legal Information Institute
- Establishment of e-justice for the Judicial Service and the Judiciary support to incorporate electronic ways of delivering justice within the context of a government Policy and to improve e-governance.
- Development of Public Relations and Complains Units (PRCU)
- Development Environmental Adjudication Manual specifically within the “galamsey” hotspots in Ghana
- Approval of Code of Conduct for the ethical behavior of judges and staff
- Development of Standard Operating Procedures for Supervising High Court Judges

Judiciary and the Judicial Service Main Achievements

- The first web-based legal library provides the potential and sustainable solution to the difficulties in accessing key laws, court judgements and related judicial documents in Ghana for the Bench at all levels of the Court hierarchy, the bar and court users impedes the efficient and effective administration of justice.
 - This is the first time that judges are trained on Environmental issues. This is an opportunity to strengthen prosecution of alleged offenders for sanitize the mining sector and introduce reforms that reduced the debilitating consequences of surface mining.
-

²⁰ Interview with OAG



- A Court Case Management System (CCMS) has been implemented in 43 High Courts in Accra which allows paperless filing of cases, with over 2 million court documents digitized in the Law Court Complex. Direct Transcription Systems have been adopted to facilitate court proceedings. Electronic Case Distribution Systems have been introduced in some Courts to distribute cases automatically.
- The establishment of the physical units of PRCU in the regions, as well as the establishment of the online complaints management system offer for the first time the possibility to classify, capitalize and monitor citizenry complaints

EOCO Main activities

- Development of a communication strategy that can guide EOCO's public affairs in the coming years, ensuring shared ownership across the organization ;
- Establishment and roll out of internal SOPs for the collection and dissemination of news items for EOCO's website and social media;
- Budget allocations for public affairs

EOCO Main Achievements

- EOCO and a number of internal measures have been taken to ensure the sustainability of the EOCO support provided

EPA Main activities

- Establishment basic compliance of legal small-scale miners through better regulation and monitoring;
- Establishment of reporting and complaints management;
- Development of public education policy on environmental governance;
- Design of EPA Legal Unit programme (Guideline on prosecution environmental crimes/ Specific focus on pollution;
- Development of EPA Public Education Strategy.

EPA Main Achievements

- Establishment for the first time of environmental governance pre methodology to fight against corruption crimes

Legal Aid Scheme (LAS) – Legal Aid Commission (LAC) Main activities

- Capacity needs assessment on legal aid communication and public education capacity
- Development of LAC Strategic Plan Monitoring Framework and Legal Aid Guide that will guide the action of the Commission.
- Development of LAC Policy
- Development of LAC Regulations

Legal Aid Scheme (LAS) – Legal Aid Commission (LAC) Main Achievements

- The transition from Legal Aid Scheme to Legal Aid Commission with the development of a range of policies, guidance materials, trainings will enable the Commission to continue delivering key essential legal aid services toward citizens.

AG's Office Main activities

- Development and handover of E-case register PPD /Solicitor platforms developed in collaboration with the Office of the Attorney General, namely the DPP Electronic Case
- Register and the SG Office Electronic Case Register.

AG's Office Main Achievements

- The two systems developed aims to improve the case file processing and communication amongst all personnel involved in the processing and administration of criminal and civil cases.
- The development of the platforms is for effective management of cases, monitoring of attorneys and Documentation.

4.3.2 Enhanced accountability across key AC institutions

The STAR-Ghana stakeholders (**NGO/CSOs** and **Private Sector** entities, and the **media**) carried out advocacy activities which led to the establishment of or change in 16 key Policies and Practices²¹. Some very important results of STAR-Ghana is the work with the Health Sector which

²¹ STAR-Ghana Foundation, End of Project Report October 2020



yielded significant results through a CSO – (Strengthening People’s Action Against Corruption) in the Health sector - addressing informal payments in the health sector and thereby reducing the incidence of corruption in the health sector in affected communities in Northern Ghana. Women who were the victims of corrupt practices in the health sector were empowered to refuse illicit payments for service delivery. NCCE activities contributed to raising awareness of a large segment of the population with regards to accountability issues holding duty bearers to account for social funds received and spent on behalf of the community.

4.3.3 Key AC institutions have enhanced capacity to combat corruption

All ARAP beneficiaries and stakeholder institutions interviewed confirmed that the ARAP trained staff have gained enhanced knowledge to better identify, investigate and prosecute corruption cases²². JS, GPS, EPA, OAG and EOCO representatives interviewed during this evaluation all confirmed that their capacity to track and conduct investigation of offences has improved when compared to the pre-project period (see table 3). There is qualitative evidence from the interviews in the field, that demonstrate that outputs contribute to the outcome of accountability institutions being strengthened and are working together more effectively due largely to the stakeholder meetings of ARAP

Table 3: ARAP capacity building Performance for enhancing collaboration among institutions

ARAP institutional capacity building performance

CHRAJ Main activities

- Capacity Development of Investigators and legal officers for Investigation . BUT CHRAJ has not yet prosecute any case

Ghana Police Service (GPS) Main activities

- Front Line Supervision (FLS) Training to 40 Trainers, reaching 2.000 inspectors and chief inspectors on a Progressive Discipline Procedure and the Local Resolution of Complaints
- Capacity building with AEG of all Police Prosecutors (About 500 prosecutors) and selected Investigators (over 500 investigators) on the pre-trial disclosure obligations of the prosecution. In addition, the trainings also covered corruption prosecution
- Training to GPS core social media team,

Judiciary and the Judicial Service Main activities

- Training for Judges of specialised environmental Courts, Training for PRCU Judges on Complaints Management Platform, Practice Direction Training, Training on Web-based Legal Library, and on Quality assurance.

EOCO Main activities

- training programme in-house for all prosecutors and investigators on Integration of the disclosure of evidence in criminal trials
- Training on digital communication

Legal Aid Scheme (LAS) – Legal Aid Commission (LAC) Main activities

- Plan Legal Training to the new staff Development of LAC

EPA Main activities

- Training on Risk Management, Training on prosecution environmental crimes, Training on on SOP of the Compliance monitoring software, Legal training,

AG’s Office Main activities

- Annual training for all State Prosecutors.
 - Delivery of Disclosure trainings to GPS and EOCO officers
 - International Exchange of experience: “Investigation and prosecution in environmental cases” (AGO and EPA)
 - International Forum: “Money Laundering, recover of assets, International Judicial cooperation & MLA) Inter-institutional coordination: AGO & EPA
-

²² ARAP (FIIAP) Final Internal Evaluation Report, 2020



- An international exchange with EPA and AGO in investigation and prosecution of environmental crimes was done in 2019. A Joint team also been put in place to coordinate the collaboration between EPA and OAG at national level in investigative process.

ARAP performance on key stakeholders coordination and complementarity

- The Office of the Directorate of Public Prosecutions (DPP) support to play a lead role in the training of Police Prosecutors and Investigators of both the Criminal Investigations Department (CID) and EOCO,
- Ghana Police Service, working in collaboration with the Office of the Attorney General to train all Police Prosecutors and selected Investigators (over 500 investigators) on the pre-trial disclosure obligations of the prosecution.
- International Exchange of experience to set up "Investigation and prosecution in environmental cases" (AG' office and EPA)
- Collaborative EPA- Metropolitan, Municipal and District Assemblies (MMDAs) workshop on complaints management pilot.
- Peer to peer learning between a CHRAJ and the Kenya National Commission on Human Rights (KNCHR);
- International exchange of experience in Spain for the JS and CHRAJ.
- International exchange of experience in Spain for EPA on investigation and prosecution of environmental crimes.

Even though there is not yet a prosecuted environmental crime case for example, the Office of AG considers that since the preparation of the Environmental Adjudication Manual and the Development of Practice Direction, in addition to training and study tours received by judges from the Environmental courts have enhanced their skills and capacity to work in the adjudication of environmental offences. The ARAP support towards EPA has paved the way to go one step further. However the EPA efforts needs to be further supported to fulfil international norms.

Brief outline of the EU methodological assessment used on environmental governance

The ARAP methodological support initiated towards key stakeholders on environmental governance was effective but not yet fully aligned with the international practices. The EU commission provided to EU countries a methodological approach on how to address the gap between the implementation and the of EU environment policy. A methodological assessment framework for environmental governance has been developed. It covers five dimensions as follows:

- **Transparency** is to ensure well-informed environmental policy decisions is that environmental data is available for use by a wide range of organizations, and by the public at large.
- **Participation:** is to look at how European countries enabled public participation (including public organizations and civil society groups) and to gauge and their public confidence in institutions; individuals' sense of their ability to influence environmental outcomes; and equitability and inclusiveness of environmental policymaking.
- **Access to justice** is the Access to justice dimension extent to which are the effective legal mechanisms for implementing environmental policy and enforcing environmental legislation are in place to ensuring and that the commitments made in legislation are delivered in practice.
- **Compliance assurance** covers "public enforcement" that authorities undertake to ensure that economic and other activities comply with environmental rules: promotion, monitoring and enforcement. It also looked at the handling of complaints on environmental issues from individual citizens and from associations.
- **Effectiveness and Efficiency** covered a wide variety of issues, including how well resources (financial, material, and human) are used in delivering environmental objectives, and whether there are effective mechanisms for ensuring that environmental issues are addressed in other areas of administration and policy.

The methodological approach as well as the wide variety of Good practices identified in European countries could be a source of inspiration for the ARAP stakeholders in environmental governance to go one-step further https://ec.europa.eu/environment/environmental_governance/assessment/good_practices.htm



4.3.4 Building Public Confidence in the Law Enforcement Institutions in the country is still a challenges

With a sceptical public, ARAP had the daunting task of not only working with public stakeholder institutions to reduce corruption in a system that the public believed was corrupt. The ARAP support to the government of Ghana could not have, in the life of the project, contributed to drastically changing perceptions in the public sphere. However ARAP support contributed to some extent in building of public confidence in a system deemed irredeemable²³.

The three-pronged approach of ARAP was coined around not only capacitating public institutions to bring the corrupt to book or prevent, but indeed to add the public education aspect to the programme in order to open doors of institutions such as the JS, EOCO and the GPS to the public. The real challenge now that ARAP is over, is for the country itself to rebuild and sustain public confidence. And this means bringing about a **sweeping change** to public attitudes, and that not only **small “flies”** are targeted by the anti-corruption squad, but **big “tigers”** as well. Additionally, in the attempt to appropriately impress upon the public, there is need to have corruption clearly defined with no ambiguity, and show that no corruption related activities was going to be tolerated.

A Complaints Unit with teeth to bite

In order for a pro-active approach, the prevention branch of the three-pronged approach needs to have not only complaint units, but as mentioned by Daniel Li, in the Road to Probity¹, setting up a Unique Corruption Prevention department, which **identifies** (detection) corruption opportunities in government systems and procedures before suggesting measures to plug the loopholes

Major civil society achievement of ARAP under five years of operation in Ghana include the following:

- Building a coalition of civil society, law enforcement, parliamentarians and international partners to influence the Bill which established the Office of the Special Prosecutor (OSP) in 2018;
- Empowering women users of health facilities in Northern Ghana to challenge illicit payments with a group of CSOs under the lead of Community Development Alliance (CDA);
- Supporting state-civil society coalitions such as the work of the Africa Centre for Energy Policy (ACEP) with the Ministry of Energy and the private sector. This improved performance of oil and gas contracts, including securing two new discoveries and recovery of \$1.57m from defaulting oil companies by the Ghana Revenue Authority (GRA);
- Empowering citizens to demand local level duty bearers to account, through social audits.

It can be said that ARAP has effectively and successfully supported the first phase of a long-term project to reduce corruption in Ghana by putting in place foundational state systems and capability in state institutions. In addition, the STAR-GHANA work stream has fostered evidence-based citizen awareness of corruption and what can be done to address it to stimulate the public and service users holding government and duty-bearers to account. The reviewers also noted evidence that this process of change is taking place in ARAP-supported interventions, from the interviews and documents reviewed.

4.4 The efficiency of ARAP management

EQ. 5. How and to what extent has ARAP project (financial and human resources) translated into a timely and cost-efficient results?

²³ NCCE End-line survey report



JC 4.1 The extent to which the outputs been produced/delivered in a cost-efficient? Evidence of adequate and cost-efficient resources applied for achieving project outcomes? To what extent are the project activities consistent with institutions internal functioning?

Each implementing partners has found various ways to implement ARAP activities: Star Ghana and NCCE have managed ARAP grant internally at their level, FIIAP has combined international and Ghanaian expertise with long-term and short term experts to trigger an efficient outcome of the programme. Mechanisms were in place for FIIAP, Star Ghana and NCCE to report periodically to EU to ensure that the EU administrative and financial requirements were met. The implementing partners reported also through the EU Steering Committee and CU who were responsible for ensuring that the ARAP programme was on track and implementing partners activities were well-integrated into the ARAP overall process.

These chosen modalities, with the decentralised management through FIIAPP, NCCE and STAR-Ghana, proved to be an effective approach which ensured **institutional support and buy-in** creating the 'right mix' for institutional capacity building, financial and technical support. The Programme intervention logic was **flexible** which made it more flexible for adjustment and changes that have occurred over the project's lifetime". This inherent flexibility through the modalities in place is considered to be a considerable strength of the Programme, in that it allowed to tailor responses to changing contexts and institutions, and was able to capitalise on emerging opportunities, and even the emergence of new institutions such as the office of the OSP. For instance, all activities under the FIIAP workplan were developed with all stakeholders over the course of the programme duration, identifying and designing the planning and allocation of project resources. The FIIAP work plan was revised annually to reflect the evolving institutional needs and to identify the common needs among institutions in line with government policy dynamic.

Given the results (see effectiveness section) compared to the cost of ARAP activities, the **cost/benefit ratio** is positive. The quantity of activities implemented by the three implementing partners against the ARAP budget demonstrated that all activities were undertaken at reasonable costs. For instance, the sheer enormity of the FIIAPP actions with over 300 activities and outputs implemented, shows the commitment of the FIAAP team to ensure effective transfer of knowledge to the beneficiary institutions. If one considers the difficult context of ARAP, i.e. time/ FIIAP delays in starting the programme due to the complexity of the programme, the time needed to understand the political economy of the stakeholder institutions and the cultural dynamics existing on the ground, FIIAP staff turnover and critically the Pandemic, then the actual time (under four years) left for implementation shows just how extremely efficient the ARAP programme was.

The diversity of the nature of expenses (FIIAP capacity building and equipment provision, ICT set-up, STAR-Ghana grants, NCCE researches and Social Audits, among others) efficiently embraced the complexity of the topic of corruption under various perspectives. For instance, the diversity and the well balanced repartition of funds among key stakeholders (Except CHRAJ) demonstrated that ARAP overall intervention logic was coherent with a well-targeted and integrated institutional management focus that encompasses the links among institutions.

Given the profiles and number human resources available against the enormous amount of activities and outputs delivered, it can be said that the ARAP programme responds adequately to value for money comprising the optimum combination of whole-project life cost and quality (or fitness for purpose) to meet EU requirements through the appropriate mix of relationship between economy, efficiency and effectiveness. Also, FIIAP long-term expertise provided the continuity and memory retention of the overall programme implementation while short-term expertise through GIZ as operational agency, facilitated the provision of a pool of experts, overcoming lengthy procurement processes. In total more than 65 short terms experts (e.i 40 Ghanaian experts and 25 international experts) were appointed to provide specific inputs towards key stakeholder institutions and NCCE.

While the repartition of international and Ghanaian human resources were well balanced for ensuring proper ownership of the programme, the appointment of the long-term local expert hired in 2017 to join the FIIAPP programme as the Rule of Law Expert enhanced the trust and relationship building and facilitated the access to the public institutions. The appointment of Ghanaian human resources in the top management of the programme was considered by many interviewees as an



asset to develop mentoring approaches with key Ghanaian stakeholders rather than “ready-made” expertise (one-size-fit-all) delivery.

All those factors have facilitated a smooth absorption of each implementing partner budget.

Absorption of ARAP Funds by Each Implementing Partner

- 93,38% of FIIAP budget was disbursed
- 99,9 % of NCCE Budget was disbursed
- 76 % of the overall Star Ghana budget was disbursed and 82% on the CSOs grants budget

JC 4.2. The Degree to which the chosen implementation mechanisms (incl. resources, choice of implementation modalities within various organisations (NCCE, FIIAPP and FCDO) and contractual arrangements have proved to be conducive for achieving the expected results?

Although the ARAP money was well managed by each implementing partner, covering the wide range of activities, the initial arrangement between civil society activities and institutional support created challenges for the overall management of ARAP. Most of these challenges derive from the programme design, thus resulting in different views and priorities among the implementing partners. Some of the key challenges for management of ARAP were:

- The intervention logic split into three implementing partners did not easily complement each other on demand and supply management. The ability to show direct links at the beginning stage of the programme design, between the civil society actions and the internal institutional support was a challenge, which resulted in each implementing partners (NCCE, Star Ghana and FIIAP) tending to act as an operational ‘island’ albeit with regular converging points at the SC meetings.
- The STAR-Ghana (UK-Project) in which EU contribution was diluted into a common donors’ basket of funds made it challenging tracing the direct use of EU funds.
- Beyond several bilateral collaborations between NCCE and key stakeholders, the evaluation team did not see a formally agreed framework or coordinated mechanism established by the ARAP programme for implementing activities on key institutions’ interrelated work. The evaluation team could also not link civil society/citizen actions to strengthened Ghanaian institutional strategy nor *vice et versa* i.e. citizen/CSO action need to lead to strengthened institutions in the performance of their role and mandate. Except for several activities coordinated closely by key institutions, it is difficult to assess the extent to which citizen actions (e.g. Social audit, research, surveys, CSOs advisory initiative towards Parliament etc.) connect to the strengthening of the skills and knowledge requested by key stakeholders.

Although the FIIAP Coordination Unit paid much attention on strategic issues, the evaluation team notes that the activities of each implementing partner was not visibly linked to each other. This impacted the overall efficiency of the programme.

JC 4.3. Degree to which the chosen implementation project modalities mechanisms (incl. coordination Unit ARAP Management, finance, technical strategic support activities, M&E) have proven to be conducive for achieving the expected results (outputs)?



The Programme intervention logic was *flexible as possible to meet changes that may occur over its lifetime*. This inherent flexibility through the modalities in place is considered to be a considerable strength of the Programme, in that it allowed to tailor responses to changing contexts and institutions, and to capitalise on emerging opportunities, and even the emergence of new institutions such as the office of the OSP.

The Modalities within the Coordination Unit (CU) CU supported by a FIIAPP team based in Madrid, and Steering Committee (SC) act as ARAP facilitators by addressing both supply and demand side issues, the immediate needs of key stakeholders. Those flexible approaches and modalities bringing together the main anti-corruption (AC) institutions of Ghana ensured the key stakeholders progressive awareness of the complexity of corruption issues and the ownership of the ARAP by Ghanaian beneficiaries.

4.4.1 Coordination Unit

The CU was no doubt the key to the efficient and effective implementation of ARAP. ARAP Coordination Unit (CU) undertook multiple stakeholder' needs assessment and partnership building in order to establish trust that would ensure smooth roll-out of activities. This relationship building yielded very positive results which according to most interlocutors interviewed, makes ARAP a "house-hold name" in the sense that *ARAP did not impose a top-down approach* but had dialogue with the institutional representatives to agree the way forward. The

The continuous and frequent communication with the target groups during the entire ARAP duration, the 2018 and 2019 Annual Retreats provide the opportunity to (i) develop Ad Hoc collaboration among Stakeholders (see Coherence section) and (ii) concrete lines of work which formed the basis for the development of the common work plan shared by all ARAP stakeholders. The CU place the Ghanaian key stakeholders as recognised "partners", instead of entities receiving support.

The CU role was instrumental to consolidate the coherence of the overall programme implemented by FIIAP, NCCE and STAR-Ghana. They mainly took into consideration the following actions.

- With regards to the non-availability of baseline values and the limited capacities of the targeted institutions to collect and report data, FIIAP in accordance with the Mid-term evaluation recommendations adjusted the original logframe for establishing programme baselines and for measuring the institutions progress against the ARAP objectives. The 2 original KRA were therefore adjusted and split into 3 KRA;
- The CU conducted a "final" internal evaluation under the ToC perspective for assessing the progress made by ARAP stakeholders ;
- FIIAP has also established and shared with key stakeholders an "Exit Strategy", making a number of recommendations to support the long-term impact and sustainability of the achievements. In this regard, the strategy sought to outline what should be continued after the Programme has ended, detailing how these efforts will be sustained and identifying sources of support.

Beyond communication and outreach activities realized by each implementing partners during the activities implementation, the FIIAP/ CU communication was also very efficient to promote **ARAP as a brand name in Ghana**. FIIAP/CU has produced a massive amount and a wide set of digital communication channels and products, short videos, news items and daily social media posts, and a range of multimedia materials. ARAP's Communication focused on raising awareness of corruption, inform citizens of their rights and the law, empower the public and stimulate action (generate demand for good governance) and reinforced the Ghanaian coordination and credibility within the international standards;

- ARAP Social Media platforms and website have played a central role in maintaining ongoing and updated information for public audiences A total of 50 media (online, offline, national and international) covered ARAP's activities, information on the legal mechanisms to combat corruption, on how the public can report on the different types of corruption that exist.



- The ARAP website audience's was mainly visited by Ghanaian people (average nearly 81.60% of with 52.30 % based in Accra).
- Platform such as “#UnitedAgainstCorruption” created a joint movement for sharing products made by ARAP and anti-corruption stakeholders.
- The ARAP Twitter account had a total of 1.119 tweets, 640.389 impressions and 18.251 profile visits and from 2018 to 2020
- The ARAP Facebook account had a total of 842 posts, 17.913 impressions and 636 followers.

In addition, FIIAP/ CU was proactive to set up a **capitalization of the ARAP memory** through the Activities Information System (SIA by its Spanish initials) hosted on the ARAP website <http://www.arapghana.eu/>. A repository of all activities, documents and publications as well as the “Best Practices” developed during the ARAP is very effective to capture the achievements and to disseminate the same information towards all stakeholders, development partners and civil society in order to have a view on “*what was achieved and what need to be address*” and avoid duplication of activities in future programme. This platform remains accessible to all stakeholders with their credentials for a period of one year after the programme closure.

4.4.2 The Steering Committee

The CU team reported to and supported a Steering Committee (SC) made up of representatives of the EU, the NAO's Office, and stakeholders. The representatives of SC which met every four months in Accra has proven to be an effective accountability and information exchange forum, which helps ensure Ghanaian ownership and buy-in for the programme as a whole. Although STAR-Ghana and NCCE have separate management structures, both organisations represented on the SC, underlined that the Steering Committee meetings were important to ensure exchange of information for designing a joint strategy and timely decision-making on strategic orientations of the ARAP programme implementation.

Due to the SC composition within National stakeholders, it appears that the Steering Committee (SC) meeting was less effective to provide a concrete follow up of the operational results of ARAP activities for guiding the programme. Several national and local interviewees have underlined that the flow of operational issues faced by the implementers at local levels were not considered enough or relayed enough by the national stakeholders. The deficit of SC follow up using the ARAP operational result for guiding the programme and providing strategic inputs on the strategic orientation have reduce in the overall efficiency.

JC4.4 Is the project adequately monitored?

Each Implementing partners has developed a detailed M&E framework to guide the implementation of their respective programme component. However the various M&E reports, produced FIIAPP, NCCE and Star Ghana demonstrated that those reports are more focussed on the activities monitoring than on impact of those activities.

There is not yet a formal and common M&E mechanism to document shared experiences and lessons learned across actors (civil society and key institutions) . Nor is there any monitoring of specific sectors identified as potential areas of criminal cases such as public procurement or natural resources exploitation. The ARAP ‘institutional memory’ is dispersed

4.5 Impact

EQ.6. What real difference have project activities made to the beneficiaries?

It is at this stage too early to see the impact of the programme in the life of the beneficiaries, however with the laws, SOPs, manuals and other secondary legislations completed and disseminated to the AC institutions as well as the actions of STAR-Ghana and NCCE, it can be said that all these tend towards a positive impact in a few years after project completion.



The ARAP has created an 'enabling environment of an institutional collaboration and citizenry awareness. The ARAP chain-linked approach within the consideration of interrelated issues to supporting the key institutions have created a common ground and broader stakeholders' awareness of the importance of building more collaboration among key stakeholders and between institutions and citizenry to tackle corruption. ARAP has created institutional buy in on anti-corruption and accountability methodological approach. Despite those achievements, there are several challenges and noted. They include (i) the incomplete partial use of some of the project-supported IT tools (NACoRD, GPS Petitions Management System, JS – EPRCU), (ii) the paucity of reports submitted by institutions and CSOs reporting to CHRAJ on NACAP, (iii) the absence of CHRAJ's systemic investigation of public institutions, In parallel, public advocacy, public outreach and awareness activities are clearly already impacting on attitudes and knowledge concerning corruption, and provide the information needed for citizens to demand accountability.

But there is no evidence that it has increased the citizenry engagement and the confidence in the robustness of the role played by each institution. This situation also calls into question the effectiveness of the FIIAPP 'exit strategy' that should place ARAP efforts towards Key stakeholders in the broader context of the Ghanaian government engagement. This exit strategy does not consider the inherent lack of public confidence into the Ghanaian institution which is seen as an important step to ensure the impact and sustainability of the ARAP

4.6 Sustainability

EQ 7. How and to what extent can ARAP contribution be sustained?

The ARAP achievements are mainly technical outcomes on the institutional capacity building and civic awareness. Beyond government official engagement, there is no evidence, yet that ARAP benefits of strong political support to sustain the ARAP outcomes. While there was an explicit ARAP ownership of ARAP assistance, it is not clear to what extent the key stakeholders have considered the importance of ARAP objectives which aim to sustain the key institution mandate budget-wise.

- The new procedures on policies, and strategies are sustainable and operational, but there is a risk associated with turnover of staff who have acquired specialist knowledge. This may need to be critically examined and appropriate steps taken in order to retain capacitated staff long enough for knowledge transfer and management. In addition the local technical capacities are not deemed to be suitable for maintaining some of the ARAP-supported IT tools
- While investment in and enhancement of digital tools had always been a mainstreamed focus of the ARAP, Several the institutions have dedicated funds to ensure the functioning and the use of IT tools, Equipment (EPA drone), but the sustainability of all IT tools is still not clear for all Key stakeholders .
- The ARAP groundwork is not yet translated into sustainable accountability chain system for detecting and investigating concrete criminal cases. There is still a missing test/ pilot approach with a set of areas of success along the anti-corruption chain to enforce the legitimacy the credibility and the sustainability of the ARAP interventions.

As ARAP has focused more broadly on building knowledge, collaboration and systems at less senior (operational) levels, in order for better lasting solutions that guarantee institutional ownership as a key factor for enabling sustainability, there is need to continue the focus on empowering operational unit heads, particularly under the law enforcement in general and under investigations in particular.



4.7 ARAP Added value

ARAP is innovative in the sense that no previous initiative of this scale and scope focused on Rule of Law, Accountability, and Anti-Corruption-a major and long occurring problem for the societies-has been undertaken before in Ghana.

The added value of the ARAP intervention logic is that it provides its target groups not just with the technical assistance but also with real opportunities and concrete actions to address their needs as well as with a new mentality to deal with accountability and rule of law.



5 LESSONS LEARNED

Lesson 1 for EU. ARAP is unique and innovative: A novelty introduced with the ARAP holistic approach is the consideration of the overall key institutional stakeholders needs, tailoring the EU support to the challenges and priorities of each institution to help in capacitating the institutions in their pursuit of their mandate. The ARAP contributed to having a wide spectrum of anticorruption support measures with a more strategic approach on preparing the ground of Ghanaian institutions for tackling the anticorruption chain, which is a first of its kind. The ARAP approach created an incentive to provide the ‘right mix’ of institutional and financial support to ensure an integration/mainstreaming of the anti-corruption strategy of the key stakeholders. This enabled addressing well-known Ghanaian institutional bottlenecks such as: (i) gaps in institutional strategy, knowledge, capacity and information sharing; (iii) limited cooperation between the institutions and (iv) limited use of IT tools. This approach has created an internal dynamic regarding the capacities and the functioning modalities of the institutions, encompassing the needs of each institution. The focus on the institutional capacity development of those institutions also created an “entry point” to continue to collaborate with those institutions (EU-Ghana), and to push for more collaboration between and within those institutions (vertical and horizontal collaboration) and more articulation between national and local levels actors and actions. These lessons could be taken forward in the design of future rule of law, accountability and anti-corruption support programme in Ghana and in other countries etc.

Lesson 2 for EU: By nature, corruption is a “complex” subject and the evaluation of corruption is also complex. Effects/results may be emergent and the ARAP interventions may not be amenable to linear logic, thus challenging the classical cause-effect thinking. In this complex evaluation therefore, the distinction between results (outcomes) and impacts is not always clear-cut. Many of the so-called expected outcomes may be expressed as a long-term effect so that they are akin to impacts. At the same time, “long-term” is not an absolute value or quantity and may vary from a few months to several years, especially when human benefits are concerned. All this has implications in the way in which ARAP results and impacts are presented in this evaluation. A clear choice was made to focus on the determining factors behind the ARAP activities successes and challenges and the capacity of the ARAP beneficiaries to positively impinge upon the anti-corruption reality in Ghana. On the positive side, the EU-ARAP has tackled the growing sophistication of institutional and civil needs.

The design of most of the institutional interventions has also systematically taken into consideration the emerging needs of the citizens through the establishment of citizenry complaint units. However, it emerged that the institutional ARAP achievements are still fragile and there are still some challenges for creating a chain of accountability in Ghana leading on from the complaint units towards reporting and investigating corruption crimes. There is therefore a need to continue to support Ghanaian efforts on rule of law, accountability and anti-corruption support in order to make a more visible and palpable impact and to enhance the critical mass and civil society capacity and confidence to keep the pressure for appropriate solutions. These future activities will build on the gains made during this ARAP programme.

Lesson 2 for the Ghanaian government. The ARAP actions are, in this sense, the key driver of Ghanaian Government engagement, requiring a quick response and a comprehensive and integrated approach. Given the different support provided to each institution there are still some challenges in carting through the chain of accountability in Ghana. There is a need to build one cohesive approach towards institutions, to create a sense of unity, a common understanding of the issues and the complementary approach used to tackle them, with shared methodologies. Another concern raised during the evaluation work is the gap between national levels engagement and the operational difficulties faced at regional/district levels to implement the national engagement. Creating a chain action for the different institutions to understand who takes action and at what point – through a unified methodological approach at the different levels of operation.

With regard to these challenges the Ghanaian government should consider continuous and concrete political action dedicated to support one strategy and specifically to facilitating dialogues among institutions and to assessing the performance of those institutions against their mandate. For instance, A full SWOT analysis (a public audit) of status of the AC institutions in Ghana would



help, inter alia, to measure the institutional performance and the concrete actions of each institution or the lack of it. It would help to understand how to solve eventual institutional gaps, alongside the desire to see the reduction of corruption happen and the readiness of those institutions to concretely fulfil their mandate.

Lesson 3 towards key institutions and civil society. The ARAP action has enabled civil society organizations and the media to collaborate together as coalitions, in working with the citizens to keep a critical mass that maintains pressure on duty bearers to be accountable. The evaluators are of the view that, the results so far achieved could be more wholistic through the establishment of “strategic partnerships” among key stakeholders, civil society and citizens. The results achieved by the CSO advocacy actions under STAR-Ghana has been impressive. There is may need however, to be more systematic and aligned with the Ghana anti-corruption strategy. As mentioned, civil society policy advocacy actions in favour of anti-corruption have yielded results in policy change, revision or enactment of Laws, however, there is need to ensure that the momentum continues, particularly with the media in partnership, in order for these actions to result in effective judiciary decisions and possible recovery of assets. More advocacy/pressure may also be put on how key institutions can be transparent in their decision-making processes, and a more explicit approach on coordination between anti-corruption agencies (education, health, environmental governance etc.).



6 CONCLUSIONS AND RECOMMENDATIONS

6.1 Conclusions

The overall conclusions across the different clusters of evaluation identified (strategic relevance, coherence between the KRA, the ARAP performance and the ARAP process approach) are summarised as follows:

1. ARAP aligned with Ghanaian government policies, was a direct response of the Ghanaian immediate institutional and civil society evolving needs.
2. The ARAP holistic intervention logic is a valuable entry point for more sophisticated approach dealing concretely with criminal cases.
3. Limited evidence on consistency of action between civil society *demand* strategy and institutional *supply* mechanisms.
4. ARAP activities have had positive development in each institution, but they are a large-scale experiment for the first time that should be consolidated into one formal common cohesive plan shared and used by key stakeholders in order to set up a methodological process along the accountability chain.
5. ARAP activities are effective but there is not yet a formal and common mechanism to document shared experiences and lessons learned across actors and specific sectors. Nor is there any monitoring of specific sectors identified as potential hot-spot crime areas such as public procurement or natural resources exploitation.
6. ARAP intervention is not yet optimally translated into systematic evidence-based documentation that is able to help professionals to document criminal cases.
7. ARAP is well managed and represent good value for money.
8. The ARAP output have been largely achieved, but the full ARAP potential remains under-utilised to set up a results framework to track the performance of the concrete cases of corruption.

6.2 Recommendations

Based on the conclusions above, the evaluation team presents the following recommendations:

1. Continue to support the Ghanaian efforts on accountability rule of law and anti-corruption by using the ARAP baseline and ARAP lessons learned

This recommendation could be implemented through the following measures:

- Identify and engage a strong political support for the future programme for facilitating coordination and joint actions among stakeholders. In this sense, with the High-Level Implementation Committee (HILIC) of NACAP can be considered;
- Use a longer inception phase to make an accurate Political Economy Analysis, to complete Stakeholder Mapping involved in specific sector;
- Develop of a joint Theory of Change (TOC) down to specific sector to identify a concrete goal joint plan among institutional stakeholders in order to make a more visible palpable impact during the implementation period;
- Distribute the EU funds towards the institutional stakeholders according to their pro-activity, actual engagement, use if ARAP results and alignment with the programme principles (coordination, joint work, etc.);
- Follow up on ARAP baseline created for identifying the content of the future support.



2. Define more realistic and concrete ambitions to fight against corruption. Use pilot approach on specific sector such as environmental governance and/or public sector procurement to identify specific & concrete issues in order to define a comprehensive problem driven approach

This recommendation could be implemented through the following measures:

- Take into account the sectoral issues as the point of departure for elaborating a realistic and inclusive strategy and agenda;
- Continue to empower key stakeholders and civil society under specific sectoral perspectives (environmental, procurement issues) rather than general institutional needs;
- Use more qualitative approach of trainings and set up a pool of TOT in specific sectors in environmental governance/ procurement;
- Set a results framework on specific sector to track the keys institutions performance paying attention to their links, strengths and weaknesses.

3. Focus on Judicial and prosecution and court proceedings for supporting a cohesive framework rather than policies, strategies, for tackling Grand Corruption cases rather than petty corruption which is mainly considered as an administrative misdemeanour and not prosecuted.

This recommendation could be implemented through the following measures:

- Add key elements such as detection and recovery of assets management to close the loop looking at the whole chain (access to information, detection, reporting, investigation, prosecution, adjudication and recovery of assets) (i.e. For ex: FIC, GRA, RGD);
- Continue to support the joint work between prosecutors and investigators, or joining awareness raising campaigns;
- Create a specialized body of prosecutors on environment governance and/or procurement;
- Build sectoral cohesive anti- corruption and accountability framework on specific sectors for creating legal & judicial precedent.

4. Work jointly on concrete cases using various perspectives, for creating coherence into Ghanaian puzzle

This recommendation could be implemented through the following measures:

- Work jointly in a coordinated manner on the specific sectoral issues with key stakeholders towards specific goals for creating a sense of unity, a common understanding with shared values, principles and methodology;
- Develop jointly with key stakeholders a comprehensive and holistic approach on sectoral issues looking at the whole chain (access to information, detection, reporting, investigation, prosecution, adjudication and recovery of assets) in particularly at the links and interactions among institutions. More collaboration amongst duty bearers is critical in order to define a process rather than platform of collaboration;
- Develop joint actions and roll out a more determined result-oriented interventions at national regional and local levels to ensure that capacitated skills (institutional and professional) revision of policies, strategies, action plans, development of guidelines, SOPs and manuals is being effectively used to curb corruption;
- Use various skills for finalising and optimally used the ARAP tools (i.e. concerted action is requested drone to officer to work in collaboration with legal officer to identify actual needs for court evidence; the digitalisation process Legal web library should be finalised in collaboration with legal expert;
- Connect the ARAP tools (unit complaint) linking to the other existing tools such as the Ghanaian tracking system;
- Enlarge the collaboration with the private sector (e.g. natural resources industry).



5. Bridge the gap between the demand and supply dichotomy

This recommendation could be implemented through the following measures:

- Develop common specific education/prevention and prosecution actions focusing on specific sector under the mandate of each key stakeholder institution;
- Launch a reflexion with CSOs on how to hold duty bearers into account in environmental governance;
- Promote gradual alignment of public outreach (state and institutions campaigns) with civil society awareness to generate more common and specific messages, and a sense of belonging to fight against one phenomenon. Citizens need to know what to do, why they do it, what institutions to contact and who is in charge of what in specific areas);
- Promote one systematic and shared and visible methodological approach (e-stop shop) amongst all stakeholders to promote a common message towards citizens and to do classification between administrative and legal cases. Develop joint access to information.

6. Continue to use the decentralised management and provide stronger mentoring and guidance to better use the potential added value of the ARAP

This recommendation could be implemented through the following measures:

- Use local expertise at the managerial level of programmes such as ARAP may bring on board to *open doors more seamlessly*;
- Adjust the Coordination Unit and Steering Committee functioning for ensuring that national decisions agreed with national key stakeholders take into consideration the local issues faced by local stakeholders;
- Get the Steering Committee more involved at the Higher Political level to generate a strong political support and at the operational level of project implementation for capturing better the issues faced by the local implementers at the regional/district levels and to follow up on implementation of activities;
- Follow up better intervention implemented at the regional and district levels;
- Introduce a back stopping mechanism of the implementation of tools/ methods at district & national levels for ensuring a common understanding & application of all actors;
- Launch bi-annual surveys among key stakeholders at national and local levels to understand their evolving needs;
- Use mentoring approach within key stakeholders rather than delivery of “ready-made products” ;
- Take advantage of other EU donor project results e.g., investigation of corruption (STAAC-DFID); case management systems and social accountability (USAID), (GIZ) support of the police;
- Develop guidelines based on the benchmarks and the “ performance criteria“ at the national and regional level against the concrete objective of the future EU support;
- Monitor the impact of the anti-corruption measures rather than the outputs/activities of the ARAP partners;
- Introduce a continuous and shared mechanism among Ghanaian stakeholders to jointly develop benchmarks and the “ performance criteria“ at national /district levels against the objective.



7. Continue to expose Ghanaian stakeholders to international standards and practices on specific sector approach

This recommendation could be implemented through the following measures:

- Support peer-to-peer exchanges learning experience and organisation of international exchanges in specific sector;
- Strengthen the sectoral dimension by including specific benchmarks linked to the international practices;
- While some of the measures and initiatives identified in this document have already started and are currently ongoing, the objective of this strategy is to articulate the whole set of measures to be undertaken until the end of the programme coherently and consistently;
- Continue mobilising resources with the Government of Ghana and with Development Partners to ensure that NACAP, as a concerted effort against corruption maintains momentum, strengthening and maintaining the data collection tools available (e.g. NACoRD);
- Continue strengthening its internal capacities in all its mandate areas, particularly, with regards to anti-corruption, investigations, ethics, and public education.
- Continue engaging in relevant international networks, both at a regional and global level, to ensure best practice and quality standards across its three mandate areas.



ANNEXES

Annex 1. Terms of Reference

SPECIFIC TERMS OF REFERENCE – PART A

Final Evaluation of the ARAP Programme

FWC SIEA 2018 - Lot 3 – Human Rights, Democracy and Peace

EuropeAid/138778/DH/SER/multi

OPSYS SIEA-2018-1744

CONTRACTING AUTHORITY: THE EUROPEAN UNION DELEGATION TO GHANA

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1. BACKGROUND

1.1. Relevant country / region / sector background

Ghana's progress towards democracy and good governance since the end of military rule in 1992 has been impressive. The country ranks high in all major governance, human rights and rule of law indicators when compared to countries in the sub-region and in Africa generally.¹ With some exceptions, Ghana has a solid legislative framework in place. The 1992 Constitution includes all major democratic principles and a comprehensive Bill of Rights (mostly focused on civil and political rights) and establishes various Independent Constitutional Bodies (ICBs) including the Commission on Human Rights and Administrative Justice (CHRAJ) and the National Commission for Civic Education (NCCE).

The 1992 Constitution created independent governance institutions (IGIs) to promote good governance and to help eradicate corrupt practices and conflict of interest. These IGIs include the Commission on Human Rights and Administrative Justice (CHRAJ), the National Commission for Civic Education (NCCE), the Electoral Commission (EC), the Judiciary, the National Development Planning Commission and the National Media Commission. Ghana enjoys a high degree of media freedom, and the private press and broadcasters operate without significant restrictions.

A revision of the Constitution was initiated in 2011 and the Constitution Review Commission issued a range of recommendations. Thereafter, a Constitution Review Commission Report Implementation Committee was set up. But the process to implement the recommendations of the Constitution Review Commission (drafting legislation and referendum, where required) has stalled.

Legal framework on anti-corruption

In addition to the Constitution, various laws are in place to prevent and deal with corruption and related offences. Among these laws are the Criminal Offences Act, 1960 (Act 29), Criminal (Procedure) and other Offences Act, 1960 (Act 30), Criminal Offences (Amendment) Act, 1993 (Act 458); Whistleblower Act, 2006 (Act 720), Anti-Money Laundering Act, 2008 (Act 749) and Regulations, 2011; Economic and Organized Crime Office Act, 2010 (Act 804) and Regulations, 2012; Commission on Human Rights & Administrative Justice Act, 1993 (Act 456); and the Public Office Holders (Declaration of Assets & Disqualification) Act, 1998 (Act 550).

Some other legislation was passed after ARAP implementation commenced. These include the Public Financial Management Act, 2016 (Act 921), the Office of Special Prosecutor's Act, 2017 (Act 959) and the Right to information Act, 2019 (Act 989). Other relevant legislation is pending in Parliament. These include the Conduct of Public Officers' Bill. Additional initiatives to fight corruption include the adoption by the Parliament of Ghana in 2014 of the National Anti-corruption Action Plan (NACAP), an overarching strategy for all stakeholders in the fight against corruption.

Ghana signed the United Nations Convention against Corruption (UNCAC) on 9th December, 2004 and ratified same on 27th June 2007. Also, the African Union (AU) Convention against corruption and the ECOWAS protocol on the fight against corruption were adopted at the regional and sub-regional levels. However, the legal framework still lags behind that envisaged by the UNCAC. In particular, the definition of the crime of corruption in the Criminal Offences Act dates back to 1960. It mainly covers bribery of public officials, making it merely a misdemeanour although with an enhanced potential punishment of up to 25 years imprisonment. In addition, many actions that would be regarded as corruption by the UNCAC and other countries are also only regarded as misdemeanours.

At the moment of formulation of ARAP, a process was underway to revise and broaden the definition of corruption in Ghanaian law. It was anticipated that the new definition will criminalize numerous acts that

¹ 2017 Mo Ibrahim Index of African Governance ranks Ghana 8th amongst 54 African countries with an overall score of 65 (down however from the 7th place and the 68.2 score in 2014).

are either regarded as minor offences or that are not currently criminalized in Ghana. Re-education and training of the stakeholders and of the public was considered then as a major activity in ARAP formulation. A drafting process started but has not yet been completed.

A significant effort in the fight against corruption is the establishment of the Office of the Special Prosecutor. Parliament passed the Office of the Special Prosecutor Bill in November 2017 as the Office of the Special Prosecutor Act, 2017 (Act 959). The Office has the mandate to investigate and prosecute specific cases of corruption, when the offence is in respect of a vast quantity of assets that (a) constitute a substantial proportion of the resources of the country; (b) threaten the political stability of the country; or (c) threaten the sustainable development of the country. The first Special Prosecutor, Hon. Martin Amidu was appointed on 22nd February, 2018. Ms. Cynthia Lamptey, a former acting Director of Public Prosecutions was appointed as Deputy to the Special Prosecutor on 26th April, 2018 and was sworn into Office on 29th May, 2018. The governing Board members have been appointed and the Regulations are being drafted.

The Supreme Court in *the Rep. vrs. Baffoe Bonnie and 4 others*, gave a landmark ruling regarding pre-trial evidence disclosures. The Baffoe-Bonnie judgement will affect meaningfully the way prosecutions are done. This Supreme Court ruling has important implications for the whole of the criminal justice system, requiring the need for institutions to coordinate in their work. Investigators, police prosecutors, state prosecutors and judges will have to adjust their working models and timeframe in order to meet the requirements of the Baffoe Bonnie decision.

The Legal Aid Commission Act, 2018 (Act 977) was passed to transform the scheme into a Commission in order to improve legal aid service provisioning in Ghana. The Legal Aid Commission Act mandates the Legal Aid Commission to administer legal aid to deserving individuals, provides an improved system for the assessment and approval of legal aid applications. Act 977 also improved conditions of service for staff and provides the opportunity for the LAC to lead in the development of a para-legal practice in Ghana.

EU National Indicative Programme (11th EDF 2014-2020)

Under the NIP, the first sector of intervention was set as *Governance: Public Sector Management and Accountability* (allocation € 75m to fund ARAP, PFM project, Decentralisation programmes and Elections, 23% of the total NIP). Since the return to constitutional rule in 1993, under the 1992 Constitution, Ghana has made considerable progress in establishing democratic governance. Nevertheless, there was strong recognition by the Government and DPs that some interlocking governance challenges need to be addressed in Ghana in the immediate future: improving service delivery to citizens, expanding public and private participation in governance, and accountability in managing Ghana's natural resources. Thus, the focus of the sector was to support the public sector reform at targeted levels of government. There is also a need to reinforce rule of law and public accountability of state actors, in a three pronged approach addressing the accountability chain through: i) improved rule of law and access to justice through more effective, responsive and transparent justice sector (particularly with regard to public mismanagement and breach of authority), ii) strengthened role of communities, CSOs, and media to effectively participate in and influence policy processes to improve accountability, transparency and service delivery and iii) support to oversight and control functions over the executive, notably through the reinforcement of the Parliament and Independent Constitutional Bodies (ICBs). These entities play the important roles of holding the Government accountable to its citizens, counterbalancing the powers of the Executive and deepening practice of democracy and institutional reforms.

Corruption indicators

Perception of corruption in Ghana among the population is high, according to different surveys and researches in the last few years, including researches carried out by the Ghana Integrity Initiative (GII), the Ghana chapter of Transparency International and the National Commission for Civic Education (NCCE).

Ghana Integrity Initiative (GII) has compiled the evolution of Ghana Corruption Perception Index which shows that the position has deteriorated in the last two years. The table below shows a summary of Ghana's Corruption Perception Index.

Corruption Perception Index Ghana 2012-2017			
Year	Score	Rank	Countries
2012	45	64	176
2013	46	63	177
2014	48	61	175
2015	47	56	168
2016	43	70	176
2017	40	81	180
2018	41	78	180
2019	41	80	180

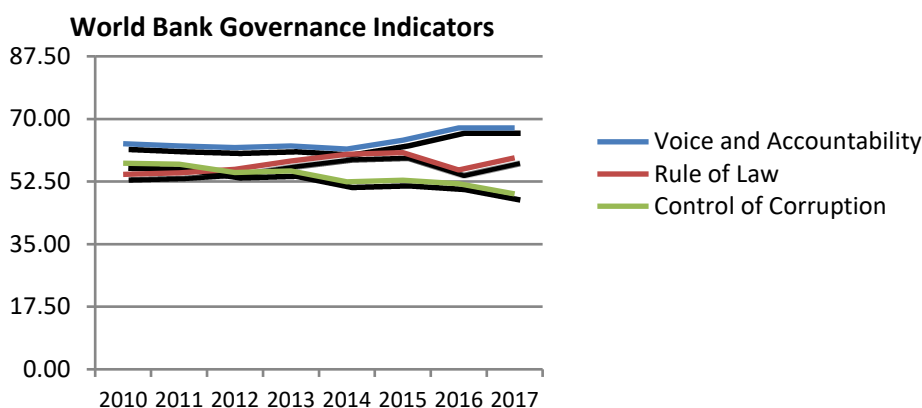
Source: Ghana integrity Initiative web page

The level of perception of corruption according to the World Bank Governance Indicator on Control of Corruption is moderate (scores between 50th and 75th percentile) closer to substantial (between 25th and 50th) than to low (higher than 75th). Other related indicators are as follows:

WB Governance Indicators	2010	2011	2012	2013	2014	2015	2016	2017		
Voice and Accountability	63.03	62.44	61.97	62.44	61.58	64.04	67.49	67.49		
Rule of Law	54.50	54.93	55.87	58.22	60.10	60.58	55.77	59.13		
Control of Corruption	57.62	57.35	54.98	55.45	52.40	52.88	51.92	49.04		

Source: compilation based on "Worldwide governance indicators 2018 update, World Bank"

In general, Governance indicators have maintained or improved, but the control of corruption has deteriorated all over the last 7 years.



1.2. The Intervention to be evaluated²

Title of the Intervention to be evaluated	Ghana Anti-Corruption, Rule of Law and Accountability Programme (ARAP)
Budget of the Intervention to be evaluated	€20 million
CRIS and / or OPSYS number of the Intervention to be evaluated	GH/FED/037-368
Dates of the Intervention to be evaluated	<ul style="list-style-type: none"> • Start: 29/01/2016 • End: 31/12/2020

The programme's specific objective is to contribute to current reform processes in the area of rule of law, accountability, anti-corruption and environmental governance through support to key institutions, while at the same time increasing the ability of the public, civil society organisations and the media to hold government to account. The programme has two interlinked and mutually supportive key results with eight main activities:

Key Result Area 1: Accountability is enhanced, leading to increased accountability, a reduction in corruption and increased environmental governance.

Key Result Area 2: Compliance with and respect of the rule of law is improved, particularly in the areas of accountability and anti-corruption.

The programme is overseen by a Steering Committee and is implemented on a daily basis by a Coordination Unit (6 staff), long-term and short-term technical advisors provided by the *Foundation for Administration and Public Policies (FIIAPP)*, which is the beneficiary of the maiden Delegation Agreement (€13m). FIIAPP has the overall responsibility of implementation of ARAP, including in overseeing the separate components described below:

² The term 'Action' is used throughout the report as a synonym of 'project and programme'.

- a Delegation Agreement with DFID (€4m) to contribute to a pool fund (along other donors) supporting the facility called STAR-GHANA, with activities aimed at civil society organisations, Parliament and the media, on the above result areas.
- a Grant to the National Commission for Civic Education (€2,2m) to deliver a civic education campaign on the above result areas.

Budget lines	EU contribution (EUR)
2.1.2 Indirect management with FIIAPP	13 000 000
2.1.3 Indirect management with DFID	4 000 000
2.1.4 Indirect management with the Government of Ghana (Grant to NCCE)	2 200 000
2.6 and 2.7 Evaluation and audit	450 000
2.8 Communication and visibility	50 000
Contingencies	300 000
Totals	20 000 000

Under Key Result Area 1, the main activities are:

1. Building the capacity of civic education providers (NCCE, CHRAJ, CSOs and the media) to conduct campaigns, advocate and lobby for increased accountability and a reduction in corruption.
2. Supporting the NCCE to conduct joint civic education and awareness on accountability.
3. Supporting CHRAJ to conduct joint anti-corruption civic education campaigns and other activities in line with the NACAP.
4. Support to CSOs, the media, Parliament and selected Parliamentary Committees to enhance their accountability, anti-corruption and lobbying and advocacy roles and functions.

Note

Support to Parliament, CSOs and the media are channelled through STAR-Ghana.

Under Key Result Area 2, the main activities are:

1. Building the capacity of prosecutors to prosecute corruption and related offences.
2. Building the capacity of the Judiciary to hear and decide corruption cases and related offences and to hold government to account.
3. Establishment of a free web-based library/resource center for all stakeholders and users of the justice system.
4. Support the police and Judiciary to combat corruption amongst their ranks.

Intervention logic

In line with the human rights based approach, activities under KRA 1 target the 'demand side' of accountability and aim to increase the ability of citizens, CSOs and the media to hold government to

account at both the national and local levels, including when it comes to how revenues are raised and spent and how services are delivered, and to improve their capacity to lobby and advocate for increased transparency and anti-corruption efforts. Support will be provided to all stakeholders to improve their understanding and capacity when it comes to anti-corruption and accountability before campaigns are undertaken. Campaigns on accountability will be led by the NCCE in partnership with other stakeholders (including the EPA, CSOs and the media) and will focus inter alia on roles and functions of government at national and local level, services to which people are entitled and how to claim these, decision and budgetary-making process and how to participate in these, how to make one's voice heard, and processes and decision-making around the oil and gas industry. In addition, Parliament and its various committees, such as the Public Accounts Committee and the Committee on Mines and Energy, will be supported to enhance their oversight role of the executive and to increase accountability including in the extractive industries sector and in the area of environmental governance. In line with the NACAP, support under this KRA will also enhance the ability of the CHRAJ to perform its constitutional anti-corruption mandate and to become a lead player in the fight against corruption, including through public education and awareness (in concert with the NCCE and other stakeholders) and raising awareness amongst citizens and Municipal and District Assemblies (MDAs) of the NACAP as the overarching strategy for fighting corruption and through support to key activities under the NACAP (including those related to corruption in the oil and gas sector that are currently included in CHRAJ's strategic plan). It also recognises the critical role of the media and CSOs in educating the public and in exposing corruption, including in the oil and gas industry.

In line with the NACAP, and mindful that the definition of corruption may be revised, KRA 2 sought to enhance the capacity of police prosecutors, State Attorneys and, to a lesser extent, other prosecutors to prosecute cases of corruption, and the capacity of Magistrates and Judges to hear and decide cases of corruption. It recognises that police prosecutors lack basic prosecution knowledge and skills and seeks to build these skills. Where possible, and if required, EPA prosecutors would also be invited to attend such training. More specialised training on prosecuting cases of corruption would be developed and provided to the 'best of the best' police prosecutors as well as CID detectives and State Attorneys on the specific elements, evidence and skills required to prove corruption and possibly all of the new forms of corruption included in the new definition if and when it is adopted. Support is also included to the High Court, and in particular the Financial and Economic Crimes Courts that will also play the role of the Financial Administration Court for the foreseeable future, thus assisting to build capacity of the Judiciary to deal with both the criminal and civil matters referred to it and increasing the potential for accountability. High Court Judges will also be trained on the new definition of corruption, if and when it is adopted, and support will be provided to the Judicial Service to establish and maintain an electronic library for all users of the justice system (including the public) to address the lack of access to key laws, court judgments and related documents for prosecutors and lower level courts. To reduce corruption within the police and Judiciary, support was also to be provided to the Police Investigations and Professional Standards Unit (PIPS) which was renamed the Police Professional Standards Bureau (PPSB) and the Judiciary's Public Relations and Complaints Units (PRCUs) to increase their capacity and outreach when it comes to receiving and dealing with complaints of corruption amongst police and judicial officers. Although training is an integral part of KRA 2, it is not sufficient in itself and programme management will be specifically required to follow up and monitor the impact of training and other capacity development interventions to determine whether it is producing concrete outcomes and to adapt such interventions as required.

In addition, and to increase ownership and sustainability in relation to both KRA 1 and KRA 2, memoranda of understanding will be entered into with key stakeholders to ensure that capacity building interventions are agreed to, in line with priorities, supported and maintained after the end of the project (for example, through integrating training programmes developed by the programme into regular training curricula).

1.3. Stakeholders of the Intervention

Direct Stakeholders

- **Commission for Human Rights and Administrative Justice (CHRAJ)**

The Commission on Human Rights and Administrative Justice (CHRAJ) was created in 1993 as an independent institution designed to ensure the realization of fundamental human rights and freedoms in Ghana; to combat corruption and conflict of interest and provide an avenue for redress for administrative justice infractions. It exists to build on and improve good governance, democracy, integrity, peace and social development across the nation. Such a role allows it to pursue justice in Ghana's administrative system and fairness throughout society, which includes dealing with complaints about public institutions and investigating corruption.

As Ghana's anti-corruption agency, CHRAJ has the responsibility to investigate and report cases of corruption, abuse of power and unfair treatment by public officials. Most notably, CHRAJ is also responsible for coordinating the country's National Anti-Corruption Action Plan. ARAP supports CHRAJ in these lines of work, enhancing on one hand NACAP coordination through technical assistance and capacity building to strengthen planning, monitoring and reporting. On the other hand, ARAP supports CHRAJ to plan and deliver on its direct NACAP mandates such as systemic investigations, public education and ensuring transparency and integrity in the Public Sector.

- **Ghana Police Service (GPS)**

The Ghana Police Service (GPS) is the primary law enforcement agency for the country. Its history dates back to 1821 with the introduction of professional policing. Working under the Ministry of Interior, it seeks to protect and preserve the internal security of Ghana, helping to ensure citizens can enjoy safe, secure and peaceful communities. Its focus on crime prevention and detection, as well as the apprehension and prosecution of offenders, also makes it an important stakeholder for ARAP's anti-corruption efforts in Ghana.

ARAP actively works alongside GPS to ensure accountability and transparency throughout its own policies, procedures and working practices. Such efforts seek to strengthen internal integrity and accountability, necessary for combatting corruption within the police ranks, and staying true to their motto '*Service with Integrity*'. GPS is a crucial actor of Ghana's anti-corruption chain, as one of the main investigating and prosecuting agencies.

- **Judicial service of Ghana (JS)**

The Judicial Service (JS) of Ghana is an independent State body that has the authority to interpret, apply and enforce the laws of Ghana. It exists to resolve legal conflicts fairly and efficiently. All citizens have the right to access the Courts, which have a presence in all regions of the country. This central role in Ghanaian society, together with its strong commitment to fight corruption, makes the JS an important stakeholder for ARAP. Collaboration has involved support for the judiciary to improve their ability to hear and decide on corruption cases. Training for judges, magistrates and staff who may be inexperienced in the handling of corruption cases is essential in the fight against corruption. This includes strengthening environmental governance by providing training in the environmental courts.

In addition to training and public education activities, the JS also focusses on using technology to help increase efficiency and therefore minimize opportunities for corruption. ARAP is supporting the development of a web-based library to help the criminal justice system handle cases of corruption and increase awareness for the general public.

- **Office of the Attorney General (OAG)**

Article 88 of the 1992 Constitution creates the Office of the Attorney General as the principal legal advisor to Government. The OAG exists to oversee an efficient and transparent legal system, and helps ensure that

all citizens have equality of access to justice. This position of duty means that any civil proceedings against the State can be brought against the Attorney General as a Defendant.

ARAP supports the OAG by providing technical assistance and capacity development, equipping it with key tools to effectively conduct prosecutions throughout the country. Dialogue with the Attorney General Department and particularly the Public Prosecution Division (PPD) has resulted in three main areas of ARAP collaboration: information management (particularly case registry), prosecution capacity development (particularly corruption cases); and inter-agency coordination (with other prosecution and investigation agencies). The recent Supreme Court of Ghana decision in *the Republic v. Baffoe Bonnie and 4 others* on the obligation of the prosecution to engage in pre-trial disclosures has necessitated support of ARAP to train Attorneys of the OAG to fully appreciate their obligations to disclose evidence to accused persons.

- **National Commission for Civic Education (NCCE)**

The National Commission for Civic Education (NCCE) was set up in 1993 by the National Commission on Civic Education Act, 1993 (Act 452) to strengthen and promote Ghana's democracy through educating citizens about their rights and obligations. The main functions of the NCCE are:

- to create and sustain within the society the awareness of the principles and objectives of the Constitution as the fundamental law of the people of Ghana;
- to educate and encourage the public to defend the Constitution at all times, against all forms of abuse and violation;
- to formulate, implement and oversee programmes intended to inculcate in the citizens of Ghana awareness of their civic responsibilities and an appreciation of their rights and obligations as free people; and

The NCCE is an independent, non-partisan public institution. With a presence in every district throughout the country, it plays a crucial awareness raising role that supports ARAP's delivery of public and civic education activities.

NCCE's expertise in public education coupled with its ability to reach citizens at national, regional and district level make it an important stakeholder in the programme. In the ARAP framework, NCCE deploys its public educators to work directly with the general public on anti-corruption and accountability issues.

Indirect Stakeholders

- **Legal Aid Commission (LAC)**

In 1997, Ghana's Legal Aid Scheme (LAS) was created to ensure that all citizens have equal access to justice and equal treatment before the law.

Its goal is to achieve a just and equitable society by providing nationwide quality legal aid. LAS acts as a Public Defender in cases where Ghana's socially and financially disadvantaged citizens may require legal services. With a presence in all districts throughout Ghana, the LAS works to provide information for the general public to increase their understanding of the law, and the legal services they can receive.

The LAS is fundamental to the fight against corruption, where legal aid can be offered to citizens wishing to pursue cases of corruption. Encouraging citizens to file lawsuits against public officials in cases of misappropriated funds for example can help to reduce the size of the problem. ARAP supports the training of lawyers and paralegals, as well as public education activities in such anti-corruption efforts. In 2018, the Legal Aid Commission Act, 2018 (Act 977) transformed the LAS into the Legal Aid Commission (LAC).

- **Environmental Protection Agency (EPA)**

The Environmental Protection Agency (EPA) was established in 1994 to improve and protect Ghana's environment, oversee the implementation of the National Environment Policy, and find solutions to global environmental problems. With offices throughout the country, it is the public body responsible for

planning, managing and regulating all environment-related projects, policies and programmes. Ensuring that environmental factors are included in development strategies at national, regional, district and community levels is central to the EPA's work.

For the EPA, public participation, new scientific and technological innovations, good governance and partnerships are all crucial to looking after Ghana's air, land and water. Due to ARAP's particular focus on environmental governance in Ghana, the EPA is a fundamental partner for the programme. Further, valuable training of judges and prosecutors in environmental law, as well as ARAP's public education activities were developed.

Within the environmental governance sector, ARAP has identified small scale mining as a serious environmental problem in Ghana. Joint efforts with the EPA have focused on monitoring small scale mining, creating a reporting mechanism to address any non-compliant and illegal practices. Such monitoring is a priority to strengthen environmental governance and tackle related corrupt activities. EPA also helps to lead the programmes' awareness campaigns to prevent such illegal and unsafe practices.

- **Economic and Organised Crime Office (EOCO)**

The Economic and Organised Crime Office (EOCO) was established in 1993 to lead Ghana's efforts against the increasing challenges of economic and organised crime. It is responsible for preventing, detecting and investigating crimes such as money laundering, human trafficking, illegal cyber activity and tax fraud. Under the authority of the Attorney General, the EOCO can prosecute such offences and importantly, confiscate any proceeds of the crime.

EOCO's responsibility also includes the sharing and reporting of information related to economic and organised crime, which requires working alongside related agencies and partner organisations. EOCO's expertise in and position to help fight complex fraud and corruption in Ghana makes it an important partner organisation for ARAP, mainly through public education activities.

- **Civil Society, Media and Parliament**

STAR Ghana II

Civil society organizations are relatively well-established and with a good number of policy think-tanks as well as local organizations. Media space remains good, but with a degree of self-censorship and other informal constraints. There are regular indications of subtle threats when media, most often progressive radio- and web-based media, report on corruption.

ARAP, building on the achievements done under Star Ghana I, joined through a separate Delegation Agreement this major CSO facility in the country with €4m managed by DFID as a multi-donor action. Specifically, the EU contribution to STAR II is expected to support CSOs, the media, Parliament to enhance accountability, anti-corruption, lobbying and advocacy roles and actions. Particularly, two specific Anti-Corruption and Local Governance Calls, along a Parliamentary support is currently implemented; these components are at the core of the EU contribution to STAR GHANA.

1.4. Other available information

Refer Annex II.

2. DESCRIPTION OF THE EVALUATION ASSIGNMENT

Type of evaluation	Final
Coverage	The Intervention in its entirety
Geographic scope	Ghana
Period to be evaluated	From 29/01/2016 to 31/12/2020

2.1. Objectives of the evaluation

Systematic and timely evaluation of its programmes and activities is an established priority³ of the European Commission⁴. The focus of evaluations is on the **assessment of achievements**, the **quality** and the **results**⁵ of Interventions in the context of an evolving cooperation policy with an increasing emphasis on **result-oriented approaches and the contribution towards the implementation of the SDGs**.⁶

From this perspective, evaluations should **look for evidence of why, whether or how these results are linked to the EU intervention** and seek to **identify the factors driving or hindering progress**.

Evaluations should provide an understanding of the **cause and effect links** among inputs and activities, and outputs, outcomes and impacts. Evaluations should serve accountability, decision-making, learning and management purposes.

The main objectives of this evaluation are to provide the relevant services of the European Union, the interested stakeholders with:

- an overall independent assessment of the past performance of the ARAP programme, paying particular attention to its final results measured against its expected objectives; and the reasons underpinning such results;
- key lessons learned, conclusions and related recommendations in order to improve future Interventions.

In particular, this evaluation will serve as a legacy of the work delivered by the beneficiaries, to be sustained in their future interventions.

The main users of this evaluation will be the EU Delegation and the beneficiary institutions.

³ COM(2013) 686 final "Strengthening the foundations of Smart Regulation – improving evaluation" - http://ec.europa.eu/smart-regulation/docs/com_2013_686_en.pdf; EU Financial regulation (art 27); Regulation (EC) No 1905/2006; Regulation (EC) No 1889/2006; Regulation (EC) No 1638/2006; Regulation (EC) No 1717/2006; Council Regulation (EC) No 215/2008

⁴ SEC (2007)213 "Responding to Strategic Needs: Reinforcing the use of evaluation", https://ec.europa.eu/smart-regulation/docs/com_2013_686_en.pdf; SWD (2015)111 "Better Regulation Guidelines", http://ec.europa.eu/smart-regulation/guidelines/docs/swd_br_guidelines_en.pdf; COM(2017) 651 final "Completing the Better Regulation Agenda: Better solutions for better results", https://ec.europa.eu/info/sites/info/files/completing-the-better-regulation-agenda-better-solutions-for-better-results_en.pdf

⁵ Reference is made to the entire results chain, covering outputs, outcomes and impacts. Cfr. Regulation (EU) No 236/2014 "Laying down common rules and procedures for the implementation of the Union's instruments for financing external action" - https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/financial_assistance/ipa/2014/236-2014_cir.pdf

⁶ The New European Consensus on Development 'Our World, Our Dignity, Our Future', Official Journal 30th of June 2017. <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C:2017:210:TOC>

2.2. Requested services

2.2.1. Scope of the evaluation

The evaluation will assess the Intervention using the six standard DAC evaluation criteria, namely: relevance, coherence, effectiveness, efficiency, sustainability and impact. In addition, the evaluation will assess one EU specific evaluation criterion, which is:

- the EU added value (the extent to which the Intervention brings additional benefits to what would have resulted from Member States' interventions only);

The definition of the 6 DAC + 1 EU evaluation criteria is contained for reference in the Annex VII.

The evaluation team shall furthermore consider whether gender, environment and climate change were mainstreamed; the relevant SDGs and their interlinkages were identified; the principle of Leave No-One Behind and the rights-based approach methodology was followed in the identification/formulation documents and the extent to which they have been reflected in the implementation of the Intervention, its governance and monitoring.

2.2.2. Indicative Issues to be addressed

The specific Issues to be addressed as formulated below are indicative. Based on the latter and following initial consultations and document analysis, the evaluation team will discuss them with the Evaluation Manager⁷ and propose in their Inception Report a complete and finalised set of Evaluation Questions with indication of specific Judgement Criteria and Indicators, as well as the relevant data collection sources and tools.

Once agreed through the approval of the Inception Report, the Evaluation Questions will become contractually binding.

The issues to be addressed are:

- The extent to which ARAP's three separate components – FIIAPP Delegation Agreement, NCCE Grant Agreement, STAR Ghana Delegation Agreement have reached the foreseen results, with measurable impact at the end of the Action (or in future);
- The extent to which ARAP three components met the objectives of the programme;
- The challenges and opportunities that can inform future interventions (including through sustainability).

2.3. Phases of the evaluation and required outputs

The evaluation process will be carried out in three phases:

- Inception
- Field
- Synthesis

The outputs of each phase are to be submitted at the end of the corresponding phases as specified in the synoptic table in section 2.3.1.

⁷ The Evaluation Manager is the staff of the Contracting Authority managing the evaluation contract. In most cases this person will be the Operational manager of the Action(s) under evaluation.

2.3.1. Synoptic table

The following table presents an overview of the key activities to be conducted within each phase and lists the outputs to be produced by the team as well as the key meetings with the Contracting Authority and the Reference Group. The main content of each output is described in Chapter 5.

Phases of the evaluation	Key activities	Outputs and meetings
<u>Inception Phase</u>	<ul style="list-style-type: none"> • Initial document/data collection • Background analysis • Inception interviews (as relevant) • Stakeholder analysis • Reconstruction (or as necessary, construction) of the Intervention Logic, and/or description of the Theory of Change (based upon available documentation and interviews) • Methodological design of the evaluation (Evaluation Questions with judgement criteria, indicators and methods of data collection and analysis) and evaluation matrix 	<ul style="list-style-type: none"> • <i>Kick-off meeting with the Contracting Authority and the Reference Group in Accra, Ghana</i> • Inception Note
<u>Field Phase</u>	<ul style="list-style-type: none"> • Gathering of primary evidence with the use of relevant tools, such as interviews, focus groups, storytelling sessions, surveys etc. • Data collection and analysis 	<ul style="list-style-type: none"> • <i>Meetings at country level with relevant stakeholders</i> • Slide Presentation of key findings of the field phase • <i>Debriefing with the Reference Group</i>
<u>Synthesis phase</u>	<ul style="list-style-type: none"> • Final analysis of findings (with focus on the Evaluation Questions) • Formulation of the overall assessment, conclusions and recommendations • Reporting 	<ul style="list-style-type: none"> • Draft Final Report • Executive Summary according to the standard template published in the EVAL module • If needed, remote conference with Reference group in view of finalising the report • Final Report

2.3.2. Inception Phase

This phase aims at structuring the evaluation and clarifying the key issues to be addressed.

The phase will start with initial background study, to be conducted by the evaluators from home. It will then continue with a kick-off session in Accra, Ghana, between the Reference Group and the evaluators.

Half-day presence of evaluators is required. The meeting aims at arriving at a clear and shared understanding of the scope of the evaluation, its limitations and feasibility. It also serves to clarify expectations regarding evaluation outputs, the methodology to be used and, where necessary, to pass on additional or latest relevant information.

In the Inception phase, the relevant documents will be reviewed (see annex II).

Further to a first desk review of the political, institutional and/or technical/cooperation framework of EU support to Governance sector in Ghana, the evaluation team, in consultation with the Evaluation Manager will reconstruct or as necessary construct, the Intervention Logic of the Intervention to be evaluated.

Furthermore, based on the Intervention Logic, the evaluators will develop a narrative explanation of the logic of the Intervention that describes how change is expected to happen within the Intervention, all along its results chain, i.e. Theory of Change. This explanation includes an assessment of the evidence underpinning this logic (especially between outputs and outcomes, and between outcomes and impact), and articulates the assumptions that must hold for the Intervention to work, as well as identification of the factors most likely to inhibit the change from happening.

Based on the Intervention Logic and the Theory of Change the evaluators will finalise i) the Evaluation Questions with the definition of judgement criteria and indicators, the selection of data collection tools and sources, ii) the evaluation methodology, and iii) the planning of the following phases.

The methodological approach will be represented in an Evaluation Design Matrix⁸, which will be included in the Inception Report. The **methodology of the evaluation should be gender sensitive, contemplate the use of sex- and age-disaggregated data and demonstrate how actions have contributed to progress on gender equality.**

The limitations faced or to be faced during the evaluation exercise will be discussed and mitigation measures described in the Inception Note. Finally, the work plan for the overall evaluation process will be presented and agreed in this phase; this work plan shall be in line with that proposed in the present ToR. Any modifications shall be justified and agreed with the Evaluation Manager.

On the basis of the information collected, the evaluation team should prepare an **Inception Note**; its content is described in Chapter 5.

The evaluation team will then, if needed, present in Accra the Inception Note to the Reference Group.

2.3.3. Field Phase

The Field Phase starts after approval of the Inception Note by the Evaluation Manager.

If any significant deviation from the agreed work plan or schedule is perceived as creating a risk for the quality of the evaluation or not respecting the end of the validity of the specific contract, these elements are to be immediately discussed with the Evaluation Manager and, regarding the validity of the contract, corrective measures undertaken.

In the first days of the field phase, the evaluation team shall hold a briefing meeting with the programme management, the Delegation and other relevant stakeholders.

During the field phase, the evaluation team shall ensure adequate contact and consultation with, and involvement of the different stakeholders; with the relevant government authorities and agencies. Throughout the mission the evaluation team will use the most reliable and appropriate sources of

⁸ *The Evaluation Matrix is a tool to structure the evaluation analysis (by defining judgement criteria and indicators for each evaluation question). It helps also to consider the most appropriate and feasible data collection method for each of the questions,*

information, respect the rights of individuals to provide information in confidence, and be sensitive to the beliefs and customs of local social and cultural environments.

At the end of the field phase, the evaluation team will summarise its work, analyse the reliability and coverage of data collection, and present preliminary findings in a meeting with the Reference Group.

At the end of the Field Phase a Slide Presentation will be prepared; its content is described in Chapter 5.

2.3.4. Synthesis Phase

This phase is devoted to the preparation by the contractor of **two distinct documents**: the **Executive Summary** and the **Final Report**, whose structures are described in the Annex III; it entails the analysis of the data collected during the desk and field phases to answer the Evaluation Questions and preparation of the overall assessment, conclusions and recommendations of the evaluation.

The evaluation team will present, in a single Report with Annexes, their findings, conclusions and recommendations in accordance with the structure in Annex III; a separate Executive Summary will be produced as well, following the compulsory format given in the EVAL module (see Annex III).

The evaluation team will make sure that:

- Their assessments are objective and balanced, statements are accurate and evidence-based, and recommendations realistic and clearly targeted.
- When drafting the report, they will acknowledge clearly where changes in the desired direction are known to be already taking place.
- The wording, inclusive of the abbreviations used, takes into account the audience as identified in art. 2.1 above.

The evaluation team will deliver and then present in Accra the **Draft Final Report** to the Reference Group to discuss the draft findings, conclusions and recommendations. One day of presence is required of the team.

The Evaluation Manager consolidates the comments expressed by the Reference Group members and sends them to the evaluation team for the report revision, together with a first version of the Quality Assessment Grid (QAG) assessing the quality of the Draft Final Report. The content of the QAG will be discussed with the evaluation team to verify if further improvements are required, and the evaluation team will be invited to comment on the conclusions formulated in the QAG (through the EVAL Module).

The evaluation team will then finalise the **Final Report** and the **Executive Summary** by addressing the relevant comments. While potential quality issues, factual errors or methodological problems should be corrected, comments linked to diverging judgements may be either accepted or rejected. In the latter instance, the evaluation team must explain the reasons in writing. After approval of the final report, the QAG will be updated and sent to the evaluators via EVAL Module.

2.4. Specific Contract Organisation and Methodology (Technical offer)

The invited Framework Contractors will submit their specific Contract Organisation and Methodology by using the standard SIEA template B VII-d-(i) and its annexes 1 and 2 (B VII-d-(ii)).

The evaluation methodology proposed to undertake the assignment will be described in the Chapter 3 (Strategy and timetable of work) of the template B-VII-d-i. Contractors will describe how their proposed methodology will address the cross-cutting issues mentioned in these Terms of Reference and notably gender equality and the empowerment of women. This will include (if applicable) the communication action messages, materials and management structures.

2.5. Management and Steering of the evaluation

2.5.1. At the EU level

The evaluation is managed by the Evaluation Manager of the EUD/Governance section; the progress of the evaluation will be followed closely with the assistance of a Reference Group consisting of the Coordination Unit of ARAP being managed by FIIAPP, one representative from STAR Ghana and NCCE, the National Authorising Officer (NAO-Ministry of Finance), and the Evaluation Manager.

The main functions of the Reference Group are:

- To define and validate the Evaluation Questions.
- To facilitate contacts between the evaluation team and the EU services and external stakeholders.
- To ensure that the evaluation team has access to and has consulted all relevant information sources and documents related to the Intervention.
- To discuss and comment on notes and reports delivered by the evaluation team. Comments by individual group members are compiled into a single document by the Evaluation Manager and subsequently transmitted to the evaluation team.
- To assist in feedback on the findings, conclusions, lessons and recommendations from the evaluation.
- To support the development of a proper follow-up action plan after completion of the evaluation.

2.5.2. At the Contractor level

Further to the Requirements set in the art. 6 of the Global Terms of Reference and in the Global Organisation and Methodology, respectively annexes II and III of the Framework contract SIEA 2018, the contractor is responsible for the quality of: the process; the evaluation design; the inputs and the outputs of the evaluation. In particular, it will:

- Support the Team Leader in its role, mainly from a team management perspective. In this regard, the contractor should make sure that, for each evaluation phase, specific tasks and outputs for each team member are clearly defined and understood.
- Provide backstopping and quality control of the evaluation team's work throughout the assignment.
- Ensure that the evaluators are adequately resourced to perform all required tasks within the time framework of the contract.

3. LOGISTICS AND TIMING

Please refer to Part B of the Terms of Reference.

3.1. Planning, including the period for notification for placement of the staff⁹

As part of the technical offer, the framework contractor must fill in the timetable in the Annex IV (to be finalised in the Inception Note). The 'Indicative dates' are not to be formulated as fixed dates but rather as days (or weeks, or months) from the beginning of the assignment (to be referenced as '0').

Sufficient forward planning is to be taken into account in order to ensure the active participation and consultation with government representatives, national / local or other stakeholders.

⁹ As per art 16.4 a) of the General Conditions of the Framework Contract SIEA

4. REQUIREMENTS

Please refer to Part B of the Terms of Reference.

5. REPORTS

For the list of reports, please refer to Part B of the Terms of Reference.

5.1. Use of the EVAL module by the evaluators

It is strongly recommended that the **submission of deliverables** by the selected contractor **be performed through their uploading in the EVAL Module**, an evaluation process management tool and repository of the European Commission. The selected contractor will receive access to online and offline guidance in order to operate with the module during the related Specific contract validity.

5.2. Number of report copies

Apart from their submission -preferably via the EVAL Module-, the approved version of the Final Report will be also provided in max 10 paper copies and in electronic version [USB] at no extra cost.

5.3. Formatting of reports

All reports will be produced using Font Arial or Times New Roman minimum letter size 11 and 12 respectively, single spacing, double sided. They will be sent in Word and PDF formats.

6. MONITORING AND EVALUATION

6.1. Content of reporting

The outputs must match quality standards. The text of the reports should be illustrated, as appropriate, with maps, graphs and tables; a map of the area(s) of Intervention is required (to be attached as Annex).

6.2. Comments on the outputs

For each report, the Evaluation Manager will send to the Contractor consolidated comments received from the Reference Group or the approval of the report within 7 calendar days. The revised reports addressing the comments shall be submitted within [10] calendar days from the date of receipt of the comments. The evaluation team should provide a separate document explaining how and where comments have been integrated or the reason for not integrating certain comments, if this is the case.

6.3. Assessment of the quality of the Final Report and of the Executive Summary

The quality of the draft versions of the Final Report and of the Executive Summary will be assessed by the Evaluation Manager using the online Quality Assessment Grid (QAG) in the EVAL Module (text provided in Annex V). The Contractor is given – through the EVAL module - the possibility to comment on the assessments formulated by the Evaluation Manager. The QAG will then be reviewed following the submission of the final version of the Final Report and of the Executive Summary.

The compilation of the QAG will support/inform the compilation by the Evaluation Manager of the FWC SIEA's Specific Contract Performance Evaluation.

7. PRACTICAL INFORMATION

Please address any request for clarification and other communication to the following address(es):

[REDACTED]

ANNEXES TO TOR - PART A

ANNEX I: SPECIFIC TECHNICAL EVALUATION CRITERIA

SPECIFIC TECHNICAL EVALUATION CRITERIA

Request for Services OPSYS SIEA-2018-1518

FWC SIEA 2018 - LOT 3 Lot 3 – Human Rights, Democracy and Peace

EuropeAid/138778/DH/SER/multi

1. TECHNICAL EVALUATION CRITERIA

The Contracting Authority selects the offer with the best value for money using an 80/20 weighting between technical quality and price¹⁰.

Technical quality is evaluated on the basis of the following grid:

Criteria	Maximum
<i>Total score for Organisation and Methodology</i>	40
<ul style="list-style-type: none">• Understanding of ToR and the aim of the services to be provided	10
<ul style="list-style-type: none">• Overall methodological approach, quality control approach, appropriate mix of tools and estimate of difficulties and challenges	15
<ul style="list-style-type: none">• Technical added value, backstopping and role of the involved members of the consortium	5
<ul style="list-style-type: none">• Organisation of tasks including timetable	10
<i>Score for the expertise of the proposed team</i>	60
<i>OVERALL TOTAL SCORE</i>	100

¹⁰ For more details about the 80/20 rule, please see the PRAG, chapter 3.3.10.5 - https://ec.europa.eu/europeaid/funding/about-funding-and-procedures/procedures-and-practical-guide-prag_en

2. TECHNICAL THRESHOLD

Any offer falling short of the technical threshold of 75 out of 100 points, is automatically rejected.

3. INTERVIEWS DURING THE EVALUATION OF THE OFFERS

During the evaluation process of the offers received the Contracting Authority reserves the right to interview by phone one or several members of the proposed evaluation teams.

Phone interviews will be tentatively carried out during the period from 01/12/2020 to 10/12/2020.

ANNEX II: INFORMATION THAT WILL BE PROVIDED TO THE EVALUATION TEAM

- Legal texts and political commitments pertaining to the Intervention(s) to be evaluated
- Country Strategy Paper Ghana and Indicative Programmes (and equivalent) for the periods covered
- Relevant national / sector policies and plans from National and Local partners and other donors
- Intervention identification studies
- Intervention feasibility / formulation studies
- Intervention financing agreement and addenda
- Intervention's quarterly and annual progress reports, and technical reports
- European Commission's Result Oriented Monitoring (ROM) Reports, and other external and internal monitoring reports of the Intervention
- Intervention's mid-term evaluation report (n°2019/406819)
- Relevant documentation from National/Local partners and other donors
- Guidance for Gender sensitive evaluations
- Calendar and minutes of all the meeting of the Steering Committee of the Intervention(s)
- Any other relevant document

Note: The evaluation team has to identify and obtain any other document worth analysing, through independent research and during interviews with relevant informed parties and stakeholders of the Intervention.

ANNEX III: STRUCTURE OF THE FINAL REPORT AND OF THE EXECUTIVE SUMMARY

The contractor will deliver – **preferably through their uploading in the EVAL Module - two distinct documents**: the **Final Report** and the **Executive Summary**. They must be consistent, concise and clear and free of linguistic errors both in the original version and in their translation – if foreseen.

The Final Report should not be longer than the number of pages indicated in Chapter 6. Additional information on the overall context of the Intervention, description of methodology and analysis of findings should be reported in an Annex to the main text.

The presentation must be properly spaced and the use of clear graphs, tables and short paragraphs is strongly recommended.

The cover page of the Final Report shall carry the following text:

“This evaluation is supported and guided by the European Commission and presented by [name of consulting firm]. The report does not necessarily reflect the views and opinions of the European Commission”.

Executive Summary

A short, tightly-drafted, to-the-point and free-standing Executive Summary. It should focus on the key purpose or issues of the evaluation, outline the main analytical points, and clearly indicate the main conclusions, lessons to be learned and specific recommendations. It is to be prepared by using the specific format foreseen in the EVAL Module.

The main sections of the evaluation report shall be as follows:

1. Introduction

A description of the Intervention, of the relevant country/region/sector background and of the evaluation, providing the reader with sufficient methodological explanations to gauge the credibility of the conclusions and to acknowledge limitations or weaknesses, where relevant.

2. Answered questions / Findings

A chapter presenting the answers to the Evaluation Questions, supported by evidence and reasoning.

3. Overall assessment (optional)

A chapter synthesising all answers to Evaluation Questions into an overall assessment of the Intervention. The detailed structure of the overall assessment should be refined during the evaluation process. The relevant chapter has to articulate all the findings, conclusions and lessons in a way that reflects their importance and facilitates the reading. The structure

should not follow the Evaluation Questions, the logical framework or the evaluation criteria.

4. Conclusions and Recommendations

4.3 Lessons learnt

Lessons learnt generalise findings and translate past experience into relevant knowledge that should support decision making, improve performance and promote the achievement of better results. Ideally, they should support the work of both the relevant European and partner institutions.

4.1 Conclusions

This chapter contains the conclusions of the evaluation, organised per evaluation criterion.

In order to allow better communication of the evaluation messages that are addressed to the Commission, a table organising the conclusions by order of importance can be presented, or a paragraph or sub-chapter emphasizing the 3 or 4 major conclusions organised by order of importance, while avoiding being repetitive.

4.2 Recommendations

They are intended to improve or reform the Intervention in the framework of the cycle under way, or to prepare the design of a new Intervention for the next cycle.

Recommendations must be clustered and prioritised, and carefully targeted to the appropriate audiences at all levels, especially within the Commission structure.

5. Annexes to the report

The report should include the following annexes:

- The Terms of Reference of the evaluation
- The names of the evaluators (CVs can be shown, but summarised and limited to one page per person)
- Detailed evaluation methodology including: options taken, difficulties encountered and limitations; detail of tools and analyses.
- Evaluation Matrix
- Intervention logic / Logical Framework matrices (planned/real and improved/updated)
- Relevant geographic map(s) where the Intervention took place
- List of persons/organisations consulted
- Literature and documentation consulted
- Other technical annexes (e.g. statistical analyses, tables of contents and figures, matrix of evidence, databases) as relevant
- Detailed answer to the Evaluation Questions, judgement criteria and indicators

ANNEX IV: PLANNING SCHEDULE

This annex must be included by Framework Contractors in their Specific Contract Organisation and Methodology and forms an integral part of it. Framework Contractors can add as many rows and columns as needed.

The phases of the evaluation shall reflect those indicated in the present Terms of Reference.

		Indicative Duration in working days		
Activity	Location	Team Leader	Evaluator ...	Indicative Dates
Inception phase: total days				
Field phase: total days				
Synthesis phase: total days				

		Indicative Duration in working days		
Activity	Location	Team Leader	Evaluator ...	Indicative Dates
TOTAL working days (maximum)				

ANNEX V: QUALITY ASSESSMENT GRID

The quality of the Final Report will be assessed by the Evaluation Manager (since the submission of the draft Report and Executive Summary) using the following quality assessment grid, which is included **in the EVAL Module**; the grid will be shared with the evaluation team, which will have the possibility to include their comments.

Intervention (Project/Programme) evaluation – Quality Assessment Grid Final Report

Intervention (Project/Programme) evaluation – Quality Assessment Grid Final Report			
Evaluation title			
Evaluation managed by		Type of evaluation	
Ref. of the evaluation contract		EVAL ref.	
Evaluation budget			
EUD/Unit in charge		Evaluation Manager	
Evaluation dates	Start:		End:
Date of draft final report		Date of Response of the Services	
Comments			
Main project evaluated			
Main project evaluated			
CRIS/OPSYS # of evaluated project(s)			
DAC Sector			
Evaluation Team Leader			
Evaluation Team Leader		Evaluation Contractor	
Evaluation expert(s)			

Legend: scores and their meaning

Very satisfactory: criterion entirely fulfilled in a clear and appropriate way

Satisfactory: criterion fulfilled

Unsatisfactory: criterion partly fulfilled

Very unsatisfactory: criterion mostly not fulfilled or absent

The evaluation report is assessed as follows

1. Clarity of the report

This criterion analyses the extent to which both the Executive Summary and the Final Report:

- Are easily readable, understandable and accessible to the relevant target readers
- Highlight the key messages
- The length of the various chapters and annexes of the Report are well balanced
- Contain relevant graphs, tables and charts facilitating understanding
- Contain a list of acronyms (only the Report)
- Avoid unnecessary duplications
- Have been language checked for unclear formulations, misspelling and grammar errors
- The Executive Summary is an appropriate summary of the full report and is a free-standing document



Strengths	Weaknesses	Score
Contractor's comments	Contractor's comments	

2. Reliability of data and robustness of evidence

This criterion analyses the extent to which:

- Data/evidence was gathered as defined in the methodology
- The report considers, when relevant, evidence from EU and/or other partners' relevant studies, monitoring reports and/or evaluations
- The report contains a clear description of the limitations of the evidence, the risks of bias and the mitigating measures



Strengths	Weaknesses	Score
Contractor's comments	Contractor's comments	




3. Validity of Findings

This criterion analyses the extent to which:

- Findings derive from the evidence gathered
- Findings address all selected evaluation criteria
- Findings result from an appropriate triangulation of different, clearly identified sources
- When assessing the effect of the EU intervention, the findings describe and explain the most relevant cause/effect links between outputs, outcomes and impacts
- The analysis of evidence is comprehensive and takes into consideration contextual and external factors



Strengths	Weaknesses	Score
Contractor's comments	Contractor's comments	

4. Validity of conclusions		
<p>This criterion analyses the extent to which:</p> <ul style="list-style-type: none"> • Conclusions are logically linked to the findings, and go beyond them to provide a comprehensive analysis • Conclusions appropriately address the selected evaluation criteria and all the evaluation questions, including the relevant cross-cutting dimensions • Conclusions take into consideration the various stakeholder groups of the evaluation • Conclusions are coherent and balanced (i.e. they present a credible picture of both strengths and weaknesses), and are free of personal or partisan considerations • (If relevant) whether the report indicates when there are not sufficient findings to conclude on specific issues 		
		
Strengths	Weaknesses	Score
Contractor's comments	Contractor's comments	
5. Usefulness of recommendations		
<p>This criterion analyses the extent to which the recommendations:</p> <ul style="list-style-type: none"> • Are clearly linked to and derive from the conclusions • Are concrete, achievable and realistic • Are targeted to specific addressees • Are clustered (if relevant), prioritised, and possibly time-bound • (If relevant) provide advice for the Intervention's exit strategy, post-Intervention sustainability or for adjusting Intervention's design or plans 		
		
Strengths	Weaknesses	Score
Contractor's comments	Contractor's comments	
6. Appropriateness of lessons learnt analysis (if requested by the ToR or included by the evaluators)		
<p>This criterion is to be assessed only when requested by the ToR or included by evaluators and is not to be scored. It analyses the extent to which:</p> <ul style="list-style-type: none"> • Lessons are identified • When relevant, they are generalised in terms of wider relevance for the institution(s) 		
		
Strengths	Weaknesses	
Contractor's comments	Contractor's comments	
Final comments on the overall quality of the report		Overall score

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ANNEX VI: LOGICAL FRAMEWORK MATRIX (LOGFRAME) OF THE EVALUATED ACTION(S)

The activities, the expected outputs and all the indicators, targets and baselines included in the logframe matrix are indicative and may be updated during the implementation of the action without an amendment to the financing decision. The indicative logframe matrix will evolve during the lifetime of the action: new lines will be added for listing the activities as well as new columns for intermediary targets (milestones) when it is relevant and for reporting purpose on the achievement of results as measured by indicators.

LOGICAL FRAMEWORK				
intervention logic	objectively verifiable indicators (ovis)	Baselines /	sources of verification (sovs)	assumptions
<p>overall objective (oo):</p> <p>To promote good governance in Ghana by reducing corruption and improving accountability and compliance with the rule of law, particularly when it comes to accountability, anti-corruption and environmental governance.</p>	<p>OO I1: By 2020, Increase in compliance with good governance, rule of law and accountability at both national and local levels. (Target Increase of 5 points)</p>	<p>Mo Ibrahim Index on accountability (2014). Score 68.2</p>	<p>Mo Ibrahim Index on accountability 2020</p>	<ul style="list-style-type: none"> - Democracy and stability is maintained. - Government of Ghana (GoG) remains committed to fighting corruption, increasing accountability and transparency, including in oil and gas.
<p>specific objective (so):</p> <p>To contribute to current reform processes in rule of law, accountability, Anti-Corruption (AC) and Environmental Governance (EG) through support to key institutions, while at the same time increasing the ability of public, CSOs and media to hold government to account.</p>	<p>SO I1: Increase of 5% of members of public who would trust CHRAJ, GPS, the Judiciary/Courts as reliable institutions for reporting corruption.</p> <p>SO I2: Increase of 5% of members of public who correctly understand the concept of corruption.</p> <p>SOI3: By 2020, reduction of 5% of the members of public who consider the corruption level to be very high.</p>	<p>Data from 2017 NCCCE State of Corruption Report (Dec 2017)</p> <p>Data from 2017 NCCCE State of Corruption Report (Dec 2017)</p>	<p>NCCCE State of Corruption Report 2020.</p>	<ul style="list-style-type: none"> - GoG complies with 'transparency' requirements. - GoG buy-in to the NACAP is maintained and increased. - Courts and prosecutors will be able to cope with increase in number of corruption cases. - Judges, GPS, and prosecutors will be susceptible to training.

result (r1): improved compliance and respect of the rule of Law. Sub-Result 1.1: Enhancement of secondary legislation and policies is promoted and strengthened. Sub-Result 1.2: Legal knowledge and access to justice legislation is promoted and strengthened. Sub-Result 1.3: Criminal justice knowledge is promoted.	R1 I1: By late 2020, total nr of ARAP-supported SOPs/Manuals/ regulations on AC adopted in all key AC institutions as part of the daily procedures and practices. (Dis-aggregated by institution).	Baseline-0	Internal ARAP reports and reports from AC institutions.	GoG is willing to take steps to prevent corruption and enhance integrity. NACAP will continue to be implemented.
	R1 I2: By late 2020, total number of institutions that can easily access updated legal documents through the e-library, SOPs/Guidelines/Strategies printed and distributed with ARAP support.	Baseline-0	Internal ARAP reports and reports from AC institutions.	Staff in all key AC institutions are available to attend project activities and to act as focal points for implementing the actions.
	LOGICAL FRAMEWORK			
intervention logic	objectively verifiable indicators (ovis)	Baselines /	sources of verification (sovs)	assumptions
	R1 I3: By late 2020, total number of staff (dis-aggregated by institutions and gender) that can easily access updated legal documents through the e-library, SOPs/Guidelines/Strategies printed and distributed with ARAP support.	Baseline-0	Internal ARAP reports and reports from AC institutions.	Key AC institutions continuously affirm their proactive willingness towards sectoral reforms and to improve their performance.
	R1 I4: Nr. of EOCO, EPA, GPS staff trained by judges and prosecutors on disclosure and on EG issues by late 2020.	Baseline-0	Internal ARAP reports and reports from AC institutions.	Key AC institutions assign necessary human and financial resources to maintain and upgrade outputs of ARAP.
result 2: enhanced accountability across key ac institutions and in other public institutions.	R2 I1: By late 2020, up to 200 reports submitted to CHRAJ by institutions reporting on NACAP.	R2 I1: 55 reports in 2016.	R2I1: CHRAJ Report 2020	GoG is willing to take steps to prevent corruption and enhance integrity.
	R2 I2: By late 2020, up to 7 institutions are examined by CHRAJ using advanced systemic investigation techniques.	R2 I2: Baseline-0	R2I2: CHRAJ Report 2020	NACAP will continue to be implemented.

Sub-Result 2.1: Improved capacities for strengthening institutional accountability.	R2 I3: Nr of GPS staff trained by their peers after ARAP's ToT by late 2020.	R2 I3: Baseline-0	R2 I3: GPS Report 2020	Staff in all key AC institutions are available to attend project activities and to act as focal points for implementing the actions. Key AC institutions continuously affirm their proactive willingness towards sectoral reforms and to improve their performance. Key AC institutions assign necessary human and financial resources to maintain and upgrade outputs of ARAP.	
	Sub-Result 2.2: Strengthened institutional reporting capacities concerning AC measures and policies.	R2 I4: Total nr. of social media channels used by key AC institutions by late 2020. (dis-aggregated by institution).	R2 I4: Baseline-0		R2 I4: ARAP Reports
		R2 I5: Nr. of followers of the social media channels used by key AC institutions by late 2020 (dis-aggregated by institution).	R2 I5: Baseline-0		R2 I5: ARAP Reports
	Sub-Result 2.3 Increased public awareness on the evils of corruption and confidence in AC institutions.	R2 I6: Nr of Public Educational (PE) events/activities/ campaigns initiated/completed by targeted institutions with the support of the programme by late 2020.	R2 I6: Baseline-0		R2 I6: ARAP Reports
	Sub-Result 2.4 Citizens are empowered to report and demand institutional responsiveness.	R2 I7: Total Nr of citizens reached by PE campaigns implemented by each targeted institution by late 2020. (dis- aggregated by gender (if possible).	R2 I7: Baseline-0		R2 I7: ARAP Reports
Sub-Result 2.5 Improved capacities to manage EG issues as well as to investigate and prosecute EG crimes.	R2 I8: No. of "Integrity clubs" established in Junior and Senior High schools by late 2020.	R2 I8: Baseline-0	R2 I8: ARAP/NCCE Reports		

LOGICAL FRAMEWORK

intervention logic	objectively verifiable indicators (ovis)	Baselines /	sources of verification (sovs)	of assumptions
	R2 I9: By late 2020, increase of up to 20 reports submitted to CHRAJ on NACAP by CSOs. (Dis-aggregated by nr of gender- oriented CSOs).	R2 I9: 5 Reports in 2016	R2 I9: CHRAJ Report 2020	
	R2 I10: By late 2020, increase of up to 60% in the number of all cases of complaints registered at	R2 I10: 1293 cases in 2016	R2 I10: GPS/PPSB Reports	

GPS. (Dis-aggregated by gender of those filing a complaint)		
R2 I11: By late 2020, increase of 100% in the total number of complaints registered in all PRCUs. (Dis-aggregated by gender of those filing a complaint)	R2 I11: Baseline-0	R2 I11: JS Reports
R2 I12: Nr. of complaints registered at EPA's online complaints platform by late 2020.	R2 I12: Baseline-0	R2 I12: EPA Reports
R2 I13: By late 2020, increase of 5% of members of public who trust CHRAJ as reliable institution for reporting corruption.	R2I13: 2017 NCCE Corruption Research	R2 I13: 2020 NCCE Corruption Research
R2 I14: By late 2020, increase of 5% of members of public who trust GPS as reliable institution for reporting corruption.	R2I14: 2017 NCCE Corruption Research	R2 I14: 2020 NCCE Corruption Research
R2 I15: By late 2020, increase of 5% of members of public who believe AG is quick in prosecuting for reporting corruption.	R2I15: 2017 NCCE Corruption Research	R2 I15: 2020 NCCE Corruption Research
R2 I16: By late 2020, reduction of 5% of members of public who consider JS as being more prone to corruption when compared to other institutions.	R2I16: 2017 NCCE Corruption Research	R2 I16: 2020 NCCE Corruption Research
R2 I17: Increased nr of new tools adopted for EGR compliance monitoring by late 2020	R2I17: Baseline 0	R2I17: ARAP/EPA Reports 2020

LOGICAL FRAMEWORK

intervention logic	objectively verifiable indicators (ovis)	Baselines /	sources of verification (sovs)	assumptions
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<p>result 3: key ac institutions avail of increased capacities to combat corruption.</p> <p>Sub-Result 3.1 Improved knowledge of legal procedures/best practices/tools to investigate and prosecute corruption.</p> <p>Sub-Result 3.2 Enhanced capacities to investigate and prosecute corruption cases.</p> <p>Sub-Result 3.3 Enforcement of national anticorruption policies</p> <p>Sub-Result 3.4 Improved coordination of institutional efforts to combat corruption at local and national levels.</p> <p>Sub-Result 3.5 Improved capacities at regional and international levels for the fight against corruption.</p>	R3 I1: By 2020, increase of 50% of corruption related complaints processed by CHRAJ.	R3 I1: Baseline: 31 AC complaints in 2016.	R3I1: CHRAJ Reps.	<p>GoG is willing to take steps to prevent corruption and enhance integrity.</p> <p>NACAP will continue to be implemented.</p> <p>Staff in all key AC institutions are available to attend project activities and to act as focal points for implementing the actions.</p> <p>Key AC institutions continuously affirm their proactive willingness towards sectoral reforms and to improve their performance.</p> <p>Key AC institutions assign necessary human and financial resources to maintain and upgrade outputs of ARAP.</p>
	R3 I2: By 2020, increased number of police misconduct cases resolved vis a vis the number of police misconduct cases received.	R3 I2: 942 cases in 2016	R3 I2: PPSB Reports 2019- 2020	
	R3 I3: No. of convictions for corruption offences initiated by Police Prosecutors.	R3 I3: TBD	R3 I3: PPSB Reports 2019- 2020	
	R3 I4: No. of successful asset forfeiture applications by OAG and EOCO.	R3 I4: TBD	R3 I4: OAG Reports	
	R3 I5: No. of environmental crimes registered at prosecution offices by late 2020.	R3 I5: TBD	R3 I5: OAG Reports	
	R3 I6: No. of environmental crimes sent to court by the trained prosecutors by late 2020.	R3 I6: TBD	R3 I6: OAG Reports	
	R3 I7: Nr of a) corruption cases (Fraud, Misappropriation/ withholding of exhibits, and Extortion) and b) environmental cases heard (or adjudicated) by the judges trained by the project.	R3 I7: TBD	R3 I7: JS Reports	
	R3 I8: By 2020, increase of 30% of corruption-related cases (Fraud, Misappropriation/withholding of exhibits, and Extortion) submitted to all PRCUs.	R3 I8: Baseline 0	R3 I8: JS Reports/PRCUs data	
	R3 I9: By 2020, increase of reports on complaints prepared by PRCU evidencing corruption.	R3 I9: Baseline 0	R3 I9: JS Reports/PRCUs data	
	R3 I10: By 2020, total increase of 30% of EGR crimes prosecuted by AG.	R3 I10: TBD	R3 I10: OAG Reports	

R3 I11: Nr. of ARAP-supported joint activities where targeted institutions work together.	R3 I11: 0	R3 I11: ARAP Reports
R3 I12: Nr of ARAP-supported international events and peers meetings attended by AC institutions.	R3 I12: 0	R3 I12: ARAP Reports
R3 I13: Nr of ARAP-supported international institutions and networks with which AC institutions established relationships.	R3 I13: 0	R3 I13: ARAP Reports

ANNEX VII: THE EVALUATION CRITERIA

The definition and the number of the DAC evaluation criteria has changed following the release (10 December 2019) of the document “Evaluation Criteria: Adapted Definitions and Principles for Use” (DCD/DAC(2019)58/FINAL).

The evaluators will ensure that their analysis will respect the new definitions of these criteria and their explanatory notes. Reference and guidance documents are being developed and can be found here: <https://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm>

Unless otherwise specified in the chapter 2.2.1, the evaluation will assess the Intervention using the six standard DAC evaluation criteria and the EU added value, which is a specific EU evaluation criterion. Their definitions are reported below:

DAC CRITERIA

- **Relevance:** the “extent to which the intervention objectives and design respond to beneficiaries’, global, country, and partner/institution needs, policies, and priorities, and continue to do so if circumstances change.”
- **Coherence:** the “compatibility of the intervention with other interventions in a country, sector or institution.”
- **Effectiveness:** the “extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups.”
- **Efficiency:** the “extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way.”
- **Impact:** the “extent to which the intervention has generated or is expected to generate significant positive or negative, intended or unintended, higher-level effects.”
- **Sustainability:** the “extent to which the net benefits of the intervention continue or are likely to continue.”

EU-SPECIFIC CRITERION

- **EU added value:** the extent to which the Intervention brings additional benefits to what would have resulted from Member States' interventions only in the partner country. It directly stems from the principle of subsidiarity defined in the Article 5 of the Treaty on European Union (<https://www.europarl.europa.eu/factsheets/en/sheet/7/the-principle-of-subsidiarity>).

TERMS OF REFERENCE – PART B

BACKGROUND INFORMATION

1. Benefitting Zone

Ghana

2. Contracting authority

The European Union, represented by the European Commission, B-1049 Brussels, Belgium.

3. Contract language

English

LOCATION AND DURATION

4. Location

- Normal place of posting of the specific assignment: Home based.
- Mission(s) outside the normal place of posting and duration(s): Accra (18 days).

5. Start date and period of implementation

The indicative start date is 24/12/2020 and the period of implementation of the contract will be 180 days from this date (indicative end date: 22/06/2021).

REQUIREMENTS

6. Expertise

The minimum requirements covered by the team of experts as a whole are detailed below:

- Qualifications and skills required for the team: The team shall have a cumulative experience of at least 10 years in the area of evaluation with at least 4 evaluations conducted in Africa; a sound practice of development interventions in the sector of Good governance and accountability demonstrated by several years of experience. In particular, the Team Leader (to be identified in the Organisation and Methodology and in the Financial Offer) is expected to be a Cat I expert, possess a demonstrable senior evaluation expertise coherent with the requirements of this assignment and not provide less than 40 working days, out of which 18 in the field.
- General professional experience of the team: Significant experience in Good governance, Accountability, Corruption matters. Demonstrable in-depth knowledge of and participation in programmes/projects evaluation; Participation in EU funded accountability projects and/or anti-corruption projects in Sub-Saharan Africa will be an added-value.
- Specific professional experience of the team: Technical experience in accountability and transparency reforms, anti-corruption legislation and processes, public service reform, economic crimes prosecution, judicial, prosecutorial and investigation capacity strengthening,

will be an asset. At least one member of the team (Team Leader): - Significant experience in Evaluation policies, methodology -EU preferably- as well as practical experience of projects evaluation in leading role -at least four times- will be a defining criterion; - Participation in EU Evaluations will be an added-value; - 15 years of general experience preferably in good governance, accountability, anti-corruption reforms will be an asset.

- Language skills of the team: English

Requested number of days per category:

Expert category	Minimum requirement concerning the category	Number of working days	Additional information
Cat. I (>12 years of experience)	At least one member of the team (Team Leader): - Significant experience in Evaluation policies, methodology - EU preferably- as well as practical experience of projects evaluation in leading role -at least four times- will be a defining criterion; - Participation in EU Evaluations will be an added-value; - 15 years of general experience preferably in good governance, accountability, anti-corruption reforms will be an asset.	40	
Cat. II (>6 years of experience)	Significant experience in Good governance, Accountability, Corruption matters. Demonstrable in-depth knowledge of and participation in programmes/ projects evaluation; Participation in EU funded accountability projects and/or anti-corruption projects in Sub-	35	

Expert category	Minimum requirement concerning the category	Number of working days	Additional information
	Sahara Africa will be an added-value.		

7. Incidental expenditure

No incidental expenditure provided for in this contract.

8. Lump sums

No lump sums provided for in this contract.

9. Expenditure verification

No expenditure verification report is required.

10. Other details

1 - International Travel

Minimum quantity (if applicable): 2

2 - Local Travel

Minimum quantity (if applicable): 6

3 - Per-diem

Minimum quantity (if applicable): 36

REPORTS AND DELIVERABLES

11. Reports and deliverables requirements

Title	Content	Language	Submission timing or deadline
Inception report	<ul style="list-style-type: none"> • Intervention logic • Stakeholder map • Methodology for the evaluation, incl.: <ul style="list-style-type: none"> o Evaluation Matrix: o Evaluation Questions, with judgement criteria and indicators, and data analysis and collection methods o Field visit approach (including the criteria to select the field visits) • Analysis 	English	Within 5 Day(s) After the project start

Title	Content	Language	Submission timing or deadline
	of risks related to the evaluation methodology and mitigation measures • Work plan		
Intermediary Note, Presentation (end of field phase)	<ul style="list-style-type: none"> • Activities conducted during the field phase • Difficulties encountered during the field phase and mitigation measures adopted • Key preliminary findings (combining desk and field ones) 	English	Within 16 Day(s) Before the project end
Draft final report	Refer Annex III ToR-Structure of the Final report and Executive Summary	English	Within 19 Day(s) Before the project end
Final report	Refer Annex III ToR-Structure of the Final report and Executive Summary	English	Within 10 Day(s) Before the project end



Annex 2. Evaluation Matrix

Evaluation Matrix	
Criteria 1: Relevance <i>EQ1. To what extent has this ARAP programme responded to the institutions and civil society needs in particular on environmental governance issues?</i>	
EQs sub-questions developed by ET team	Quality control and Means of Verification (EJs & indicators)
<ul style="list-style-type: none"> Have the project interventions been tailored against the evolving context? Are ARAP objectives and KRAs set in a realistic manner? Have all relevant circumstances and risks been taken into account to the project intervention logic? Is the project adapted to the present institutional, human, financial capacities of institutional stakeholder(s) and civil society needs? Are baselines for achieving ARAP progress available in each key institution? Do all key ARAP stakeholders still demonstrate effective commitment (ownership)? 	<ul style="list-style-type: none"> Was the project design developed in a participatory and inclusive way, including consultations with key stakeholders? Existence of baseline study on the key institutions functioning for identifying activities Existence of baseline to assess common issues faced by direct and indirect stakeholders Existence of inclusive and participative strategy based on key stakeholders needs, and key stakeholders' capacities?
Criteria 2: Coherence <i>EQ2. How and to what extent has the project contributed to fostering collaboration/ joint practices between institutions and consistent civil society demands/strategy?</i>	
EQs sub-questions developed by ET team	Quality control and Means of Verification (EJs)
<ul style="list-style-type: none"> Coherence /Coordination/ complementarity among key institutions actions? Coherence /Coordination/ complementarity between FIIAPP, STAR GHANA and NCCE interventions? 	<ul style="list-style-type: none"> Number of common tools developed and used by key institutions to collaborate better Number of collaboration among direct and indirect institutions realised to intervene at national and regional levels Number of the contributions of civil society towards Key institutions, that increased awareness can have on perception of corruption and reporting Existence of an inter-institutional framework and inter-agency cooperation with for defining a model of collaboration on NACAP objectives Existence of model of collaboration between institutions (constitutional bodies) and other institutions in charge of sectoral areas (e.g. environmental governance) Existence of model of collaboration between the development partners in the field
Criteria 3: Efficiency <i>EQ3. How and to what extent has ARAP project translated to cost-efficient results?</i>	



EQs sub-questions developed by ET team	Quality control and Means of Verification (EJs)
<ul style="list-style-type: none"> • Have the chosen implementation project modalities mechanisms (incl. coordination Unit ARAP Management, finance, technical strategic support activities, M&E) proven to be conducive for achieving the expected results (outputs)? • Have the chosen implementation mechanisms (incl. re-resources, choice of implementation modalities within various organisations(NCCE, FIIAPP and DFID) and contractual arrangements proved to be conducive for achieving the expected results? • To what degree are resources (inputs) available on time in accordance with the timeframe? • To what extent are the project activities consistent with institutions internal functioning? • Have the outputs been produced/delivered in a cost-efficient manner? • Is the project adequately monitored? Evidence of adequate and cost-efficient resources applied for achieving project outcomes? 	<ul style="list-style-type: none"> • Quality of planning with respect to results-logic, basic assumptions, as well as risks. • Quality of internal procedures, manuals, and SOPs to empowering beneficiary institutions with modern equipment and software. • Establishment of an integrated monitoring system for compiling key stakeholders demand and knowledge management practices. • Number of coordination meetings Frequency and quality of communications through(Coordination Unit the Steering Committee (PSC) meetings, Annual Retreats) with the key stakeholders during the entire duration of the project, that ensure that the target groups and beneficiary institutions had sufficient opportunities to articulate their views in a comprehensive intervention logic • Quality of planning with respect to results-logic, basic assumptions, as well as risks – and make adjustments if necessary • Project planning linked with expected indicators of log frame performance • Correlation between key institutions performance and the expenditure of financial and human resources dedicated for them for achieving ARAP objectives • Indicators sex-disaggregated (women, PWDs, Youth) • Existence of ARAP Monitoring and evaluation system in place for assessing the performance of the overall programme management
<p>Criteria 4: Effectiveness</p> <p><i>EQ4. How and to what extent have raising awareness and capacity building activities contributed to empowering and enabling Institutions and citizens for rule of law enforcement, accountability?</i></p>	
EQs sub-questions developed by ET team	Quality control and Means of Verification (EJs)
<ul style="list-style-type: none"> • Do the project activities effectively support the KRAs? Are key stakeholders acquiring the necessary institutional, legal and human capacities? • Does the ARAP Programme effectively support the Government of Ghana policy and actions? Are key stakeholders acquiring the necessary institutional and human capacities? 	<ul style="list-style-type: none"> • Official Use of the development/revisions of policies/strategies/actions plans/ Guidelines/SOPs/Manuals for increasing the Institutional performance • Number of Use and performance of soft tools such as web-based platforms, e-library, Case Management System, Complaints Platforms. • increase collection and collation of data to track cases) of the National Anti-Corruption Reporting Dashboard (NACoRD), an online reporting tool developed and introduced to enhance the coordination work of CHRAJ and its stakeholders under the NACAP. • Use of Nacord by citizens (increased number of citizens complains) • Existence and use of Data on Compliance Monitoring by EPA (increase Increased number of oversighting, monitoring, and investigating offences and wrongdoings in the environmental governance)



	<ul style="list-style-type: none"> • Existence and use of IT tools/ system (inventory of policies, procedures, regulations, statistics, reporting) by the targeted institutions to be more accountable and effective towards citizens • Use of digitalization of the institutional services by the targeted institutions' and evidences of internal management, changes • Use of the E-Case Register reporting by citizens • Increased Number of complaints using a web portal filed by the public
<p>Criteria 5: Impact</p> <p>The positive and negative changes produced by the project, directly or indirectly, intended or unintended results and must include the positive and negative impact of external factors, such as changes in some certain conditions. This involves the main impacts and effects resulting from the activity on the local, national level in particular on changes on the accountability, rule of law and anti-corruption measures</p> <p><i>EQ5. What real difference have project activities made to the beneficiaries (media, youth, women, CSOs)?</i></p>	
<p>EQs sub-questions developed by ET team</p>	<p>Quality control and Means of Verification (EJs)</p>
<ul style="list-style-type: none"> • Are key stakeholders acquiring the necessary knowledge and capacities to ensure the continued flow of ARAP benefits in term of accountability and corruption chain? • Is access to the programme benefits affordable for media, civil society youth, women and CSOs in the long term? • Have the Key stakeholders taken the financial, institutional and operational measures to ensure the continuation of ARAP new products/ tools/ system after the end of the project? • Are there good practices inherent to the programme that could be useful to share beyond the action? 	<ul style="list-style-type: none"> • Are impacts from a policy being achieved? Existence of Clear links between inputs (activities), expected KRAs, project outcomes and impacts • Existence of tailored integrated and comprehensive approach for tackling the corruption chain. • Existence of continuous development cooperation & political dialogues among key stakeholders • Evidence of improvement of institutional accountability (Key institutions) towards their constituents. • Engagement of the targeted institutions to communicate with the public, and to increase awareness and networking (intra and inter institutional) where the impact is visible • Improvement of Public perception towards corruption and trust towards the targeted institutions • Existence of exit strategy
<p>Criteria 6: sustainability</p> <p><i>EQ6. How and to what extent can ARAP contribution be sustained?</i></p>	
<p>EQs sub-questions developed by ET team</p>	<p>Quality control and Means of Verification (EJs)</p>
<ul style="list-style-type: none"> • Do all key project stakeholders still demonstrate effective commitment (ownership)? 	<ul style="list-style-type: none"> • Number of initiatives taken by key institutions to pursue the ARAP achievements after the end of the ARAP programme • Number of initiatives taken citizens themselves to pursue the ARAP objectives after training and awareness activities • Continuous use of public complaints on the web portal after the end of the project • Evidence of ownerships (sustainable changes of procedures, policies, and strategies, use of local technical capacities for maintaining ARAP-supported IT tools such as the E – Case Register for AG DPP and the AG SG System. • Evidence of updating the definition of corruption to bring it more in line with international best standards and practices



	<ul style="list-style-type: none"> • Evidences of use of Web based platforms, Case Management System, Complaints Platforms secondary acts, strategies, plans, and technical guidelines lay the institutional ground for advancing reforms, and to address the citizens' needs in a more timely manner. • Clear signal of stakeholders' senior decision-makers for supporting for innovation and new approaches for change in each ARAP beneficiary institution. • Evidences that new technology has influenced changes in work modalities of those institutions.
<p>Criteria 7: Added value</p> <p><i>EQ7. How and to what extent has this project ensured EU added value and comparative advantage against activities led by EU on civil society, EU Member' States and other donors?</i></p>	
<p>EQs sub-questions developed by ET team</p>	<p>Quality control and Means of Verification (EJs)</p>
<ul style="list-style-type: none"> • Has ARAP put together the "right package of measures" to ensure an optimal use of the project support? 	<ul style="list-style-type: none"> • Amount of strategic advice taken into consideration by national authorities, • Evidence of achievements, milestones achieved • Comparative advantage of ARAP / existing project on accountability and corruption • EU/ARAP visibility as an important instrument which is part of the entirety of ARAP objective



Annex 3. Documentation reviewed

General Documentation – Project Management - sourced from the ARAP documents database (<http://www.araphana.eu/sia/web/documents>)

1. Financing Agreement No. GH/FED/037-368 between EU and Republic of Ghana
2. Terms of Reference, Final Evaluation Anti-corruption, Rule of Law and Accountability Programme (ARAP), Ghana, October 2019
3. Mid Term Evaluation Anti-corruption, Rule of Law and Accountability Programme (ARAP), Ghana, October 2019
4. Training Modules and Materials on Basic Law and Anti- Corruption in Ghana For Legal Aid Scheme, Ghana, In Partnership with Accountability, Rule of Law and Anti-Corruption Programme (ARAP), September 2017
5. ARAP Annual Report 2020
6. ARAP Annual Report 2019
7. ARAP Annual Report 2018
8. ARAP Annual Report 2017
9. ARAP Final Internal Report (Draft), FIIAPP, Managed Component
10. ARAP Updated Log Frame Matrix (LFM)
11. Michael Nest And Myra Quarm, August 2017, Assessment report on *Evaluation of linkages between Environmental Governance and the Anti-Corruption Chain in Ghana, and Opportunities for Support: A Special Focus On Illegal Mining*
12. ARAP Workplan, October 2018
13. John Gathairu & Stephen Otieno. 2019, Technical Assessment Report: Leveraging on Technology
14. Commission on Human Rights and Administrative Justice (CHRAJ) - 5 Year Strategic Plan:2021-2025
15. Report on the Gender Mainstreaming of The Accountability, Rule of Law and Anti- Corruption Programme (ARAP) And Its Partner Institutions Background Paper - Prepared by Rose Mensah-Kutin And Patricia Blankson Akakpo (Gender Mainstreaming Technical Team(GMTT)) - July 2017
16. Manual for the Prosecution of Environmental Crimes in Ghana. ARAP Handbook
17. Interim Report - Fourth Steering Committee Meeting, October 2018
18. Practice Direction. Disclosures and Case Management in Criminal Proceedings – CYAN – 2018
19. Survey on Public Perception on The State of Corruption, Public Accountability and Environmental Governance in Ghana – November 2017
20. **ARAP final evaluation : FIIAPP Documentation reviewed on the link <https://funFI-IAPPp.sharepoint.com/:f/s/proyectos2016/160900/EpIMxPGgcGICti7GQnkYEZ4BUC4p6R37xxHtvBJIMMJiUA>**
21. **ARAP digital platforms developed with ARAP support. ARAP Access to the Ghana Web-Based Library: <https://ghanalegalweblibrary.net><<https://ghanalegalweblibrary.net/>>**,
22. **Stakeholder Success stories of CHRAJ, JS, EOCO, and the link to EPA success story: <https://drive.google.com/drive/folders/1OkEY4BWsgjCHW8HVP0GMt670FGP8BgBo>**



Documentation on Star Programme

23. STAR-Ghana 2017 Annual Report, (October 2016 – September 2017)
24. STAR-Ghana 2018 Annual Report, (October 2017 – September 2018)
25. STAR-Ghana 2019 Annual Report, (October 2018 – September 2019)



Annex 4. List of persons met

ID	Date	Participant	Institution/Org. & Email	Position
1	Monday 22/2/21	[REDACTED]	EUD, Accra [REDACTED]	EUD manager
2	Monday 22/2/21	[REDACTED]	EUD, Accra [REDACTED]	EUD
3	Mon 1/3/21	[REDACTED]	FIIAAP Headquarters [REDACTED]	Administrative and finance manager
4	Mon 1/3/21	[REDACTED]	FIIAPP- ARAP, Ghana [REDACTED]	Interim Team Lead & Rule of Law Expert 2018-2019
5	Mon 1/3/21	[REDACTED]	STAR-Ghana [REDACTED]	Executive Director
6	Mon 1/3/21	[REDACTED]	STAR-Ghana [REDACTED]	M&E Officer
8	Mon 1/3/21	[REDACTED]	NAO's Office, Ministry of Finance (MOF/ [REDACTED]	Principal Economics Officer
9	Mon 1/3/21	[REDACTED]	NCCE [REDACTED]	Project Manager
10		[REDACTED]	[REDACTED]	
11	26 March 2021	[REDACTED]	FIIAPP [REDACTED]	Expert on Environmental Governance
12	30 March 2021	[REDACTED]	FIIAPP [REDACTED]	Expert on Civic Education
13	1 April 2021	[REDACTED]	FIIAPP [REDACTED]	Team Leader from 2019
14	7 April 2021	[REDACTED]	FIIAPP [REDACTED]	Team Leader until November 2016-2018
15	8 April 2021	[REDACTED]	FCDO [REDACTED]	UK FCDO Project Coordinator



16	8 April 21		FCDO [REDACTED]	UK FCDO Governance Manager
17	Wednesday, 21.04.2021		CHRAJ [REDACTED]	Deputy Com- missioner Anti- corruption
18	Wednesday 21.04.2021		CHRAJ [REDACTED]	Commissioner
19	Wednesday, 21.04.2021		CHRAJ [REDACTED]	CHRAJ
20	Wednesday, 21.04.2021		EOCO [REDACTED]	EOCO – Public Education De- partment
21	Wednesday 21.04.2021		Deputy Staff Officer Intelligence Unit (Final beneficiary of training)	EOCO
22	Thursday, 22.04.2021		Judicial Service [REDACTED]	Judicial Service Projects Direc- tor
23	Thursday, 22.04.2021		Judicial Service	Project Man- agement Officer
24	Thursday, 22.04.2021		Ghana Police Service, HQ [REDACTED]	Director, Public Affairs Division
25	Friday 23,04.21		EPA [REDACTED]	Dep. Executive Director
26	Friday 23,04.21		EPA [REDACTED]	Acting Dir, Cli- ent Relations
27	Friday 23,04.21		EPA [REDACTED]	Ag. Dir. GIS (Geographic Info System)
28	Friday 23,04.21		EOCO Economic and Organized Crime Office	Executive Di- rector
29	Friday 23,04.21		EOCO	Director of Op- erations
30	Friday 23,04.21		EOCO	Head of Legal Division
31	Friday 23,04.21		EOCO	Head/ Public Af- fairs Unit
32	Friday 23,04.21		EOCO	Special Assis- tant to Execu- tive Director
33	Friday 23.04.21		EOCO	Head, Admin- istration
34	Monday 26.04.21		Legal Aid Commission	EXECUTIVE DIRECTOR



35	Monday 26.04.21		Legal Aid Commission	Director Administration
36	Monday 26.04.21		Legal Aid Commission	Head of Procurement
37	Tuesday 27.04.21		AGO	Director of Public Prosecutions
38	Tuesday 27.04.21		AGO	Office of DPP
39	Tuesday 27.04.21		STAR-Ghana Foundation [REDACTED]	M&E Officer
40	Tuesday 27.04.21		STAR-Ghana Foundation [REDACTED] [REDACTED] [REDACTED]	Executive Director
41	Tuesday 27.04.21		Ghana Police Service Accra Regional Office [REDACTED]	Ghana Police, Legal Division, Accra Regional Office
42	Tuesday		Ghana Police Service Accra Regional Office	legal Directorate
43	Wednesday 28.04.21		NCCE [REDACTED]	Chair person, Commissioner
44	Wednesday 28.04.21		NCEE [REDACTED]	Head of Operations
45	Wednesday 28.04.21		NCCE [REDACTED]	Deputy Chairman. Operations & Project Director
46	Wednesday 28.04.21		NCCE [REDACTED]	Project Accountant
47	Wednesday 28.04.21		FIIAPP	Rule of Law Expert
48	Friday 30.04.21		EPA, Regional Office Koforidua	Eastern Regional Director
49	Friday 30.04.21		EPA, Regional Office Koforidua	Ag. Director
50	Friday 30.04.21		EPA, Regional Office Koforidua	Assistant Project Officer (APO)
51	Friday 30.04.21		EPA, Regional Office Koforidua	APO
52	Friday 30.04.21		EPA, Regional Office Koforidua	APO
53	Friday 30.04.21		EPA, Regional Office Koforidua	APO



54	Friday 30.04.21		EPA, Koforidua	Regional	Office	APO
55	Friday 30.04.21		EPA, Koforidua	Regional	Office	APO
56	Friday 30.04.21		EPA, Koforidua	Regional	Office	APO
57	Friday 30.04.21		EPA, Koforidua	Regional	Office	APO
58	Friday 30.04.21		EPA, Koforidua	Regional	Office	APO
59	Friday 30.04.21		EPA, Koforidua	Regional	Office	APO
60	Friday 30.04.21		EPA, Koforidua	Regional	Office	Ag. Director
61	Friday 30.04.21		EPA, Koforidua	Regional	Office	NABCO
62	Friday 30.04.21		Enyinam, Ghana	Easter Region,		Private Extractive Company



Annex 5. ARAP outputs achieved

KRA1

Indicators with targets	From 0 Baseline in 2017 – 2020 value
<p>R1 -1: By late 2020, total nr of ARAP-supported SOPs/Manuals/regulations on AC adopted in all key AC institutions as part of the daily procedures and practices.</p> <p>R1 -2: By late 2020, Nr of institutions that can easily access legal documents through the e-library.</p> <p>R1 -3: By late 2020, total nr of staff that can easily access updated legal documents through the e-library.</p> <p>R1 -4: Nr. of EOCO, EPA, GPS staff trained by judges and prosecutors on disclosure and on EG issues by late 2020.</p>	<p>Final values</p> <p>R1 -1: 18 ARAP-supported Strategies, SPOs, regulations adopted in all AC institutions. Largely achieved – 100%</p> <p>R1 -2: <i>2020 value to be assessed after the project's end. This has been achieved to a large degree. However, the council for law report is yet to be able to upload Law reports to their portal of the e-library.</i></p> <p>R1 -3: <i>2020 value to be assessed after the project's end. This activity was not carried out but essential for the functioning of the Council for Law Reports</i></p> <p>R1 -4: Total for both Disclosure and Env Governance: 1,988 Disclosure total-1,511: (263 EOCO investigators and prosecutors, 967 GPS Police prosecutors, 252 OAG prosecutors and various staff, 29 LAS staff) EG total--477: 271 (Other)-in 3rd Dialogue on EG; 11 in Exchange Visit on Environmental Prosecution (EPA/OAG); 29 at OAG; 150 at various EPA' Workshops; 16 at Training for Judges of Specialized Environmental Courts. Outputs Largely achieved.</p>

Source: ARAP (FIAPP Component) Final Project Report



KRA 2

Indicators with targets	Baselines	2017/2020 value
<p>R2 -1: By late 2020, up to 200 reports submitted to CHRAJ by institutions reporting on NACAP.</p> <p>R2 -2: By late 2020, up to 7 institutions are examined by CHRAJ using advanced systemic investigation techniques.</p> <p>R2 -3: Nr of GPS staff trained by their peers after ARAP's ToT by late 2020.</p> <p>R2 -4: Total nr. of social media channels used by key AC institutions by late 2020. (dis-aggregated by institution).</p> <p>R2 -5: Nr. of followers of the social media channels used by key AC institutions by late 2020 (dis-aggregated by institution).</p> <p>R2 -6: Nr of Public Educational (PE) events/activities/campaigns initiated/completed by targeted institutions with the support of the programme by late 2020.</p> <p>R2 -7: Total Nr of citizens reached by PE campaigns implemented by each targeted institution by late 2020. (dis-aggregated by gender (if possible)).</p> <p>R2 -8: No. of "Integrity clubs" established in Junior and Senior High schools by late 2020.</p> <p>R2 -9: By late 2020, increase of up to 20 reports submitted to CHRAJ on NACAP by CSOs. (Dis-aggregated by nr of gender-oriented CSOs).</p> <p>R2 -10: By late 2020, increase of up to 60% in the number of all cases of complaints registered at GPS.</p> <p>R2 -11: By late 2020, increase of 100% in the total number of complaints registered in all PRCUs.</p> <p>R2 -12: Nr. of complaints registered at EPA's online complaints platform by late 2020.</p> <p>R2 -13: By late 2020, increase of 5% of members of public who trust CHRAJ as reliable institution for reporting corruption.</p> <p>R2 -14: By late 2020, increase of 5% of members of public who trust GPS as reliable institution for reporting corruption.</p> <p>R2 -15: By late 2020, increase of 5% of members of public who believe AG is quick in prosecuting for reporting corruption.</p> <p>R2 -16: By late 2020, reduction of 5% of members of public who consider JS as being more prone to corruption when compared to other institutions.</p> <p>R2 -17: Increased nr of new tools adopted for EG compliance monitoring by late 2020.</p>	<p>R2 I1: 55 reports in 2016.</p> <p>R2 I2: Baseline-0</p> <p>R2 I3: Baseline-0</p> <p>R2 I4: Baseline-0</p> <p>R2 I5: Baseline-0</p> <p>R2 I6: Baseline-0</p> <p>R2 I7: Baseline-0</p> <p>R2 I8: Baseline-0</p> <p>R2 I9: 5 Reports in 2016</p> <p>R2 I10: 1293 cases in 2016</p> <p>R2 I11: Baseline-0</p> <p>R2 I12: Baseline-0</p> <p>R2I13: 2017 NCCE Corruption Research</p> <p>R2I14: 2017 NCCE Corruption Research</p> <p>R2I15: 2017 NCCE Corruption Research</p> <p>R2I16: 2017 NCCE Corruption Research</p> <p>R2I17: Baseline 0</p>	<p>R2 -1: 87 reports in 2017, 182 reports in 2018, 91 reports in 2019, (Data for 2020 not available yet) Downward trend in 2018-2019.</p> <p>R2 -2: 2020 Value-0, This was not achieved.</p> <p>R2 -3- 2018 Value-278, target met.</p> <p>R2 -4: Total of 9 social media channels: 2-CHRAJ (FB, Twitter), 3-GPS (FB, Twitter, Youtube), 1 LAC (FB), 2-EPA (FB, Twitter). Good progress. Expectations met.</p> <p>R2 -5: As of October 2020, total nr is -550,951. Dis-aggregated by institutions: 3137 for CHRAJ (1,395 on FB, 1,742 on Twitter), 545163 for GPS (244,151 FB, 300,932 on Twitter, 80 on Youtube), 299 for LAC (299 on FB), 2352 for EPA (1,897 on FB, 455 on Twitter). Good progress. Expectation met</p> <p>R2 -6: 4 sets of PE activities: PE campaigns delivered by GPS (Tv show, social media, PE campaigns delivered by CHRAJ (within the framework of NACAP, ACW), PE campaigns delivered by EPA, PE activities delivered by JS. Good progress. Expectations met</p> <p>R2 -7: The nr of citizens reached through these campaigns are not tracked by the targeted institutions.</p> <p>R2 -8: 2020 value is 0, target missed (No Integrity Clubs established).</p> <p>R2 -9: 2020 value is 10 reports by CSOs, the target of "up to 20" is partially met.</p> <p>R2 -10: Nr of complaints have decreases from 2018 to 2020 (1709 in 2018 to 628 till June 2020) Target missed. The question may be whether there is a decrease in corruption cases? ...there is need to carry out an analysis to determine whether this is due to decrease in corruption or whether the non-response of the police has brought about a decrease in the public to report.</p> <p>R2 -11: 191 complaints registered in all PRCUs (as of August 2020). Target met. (however, the nr of complaints via the online complaint system is low as its usage is very minimal due to inadequate public education efforts.</p> <p>R2 -12: 3 complaints registered online since October 2020. Insufficient-Target missed.</p> <p>R2 -13 and R2 I14 data not provided, can be assessed at a later stage in the NCCE 2020 State of Corruption Report.</p> <p>R2 -15: There was no direct question on how quick the AG was in prosecuting corruption in 2020, yet courts were assessed in both 2017 and 2020. Nr of respondents who believed the courts performed well or very well-15.5% in 2017 vs. 54.1% in 2020.</p> <p>R2 -16: Compared to 2017, there was no change in the JS's position when compared to other institutions as being more prone to corruption. The JS was in second position after GPS as the institution most prone to corruption in 2020 and in 2017.</p>



		R2 -17: Target achieved. Nr of tools adopted is four: 1) the Risk Assessment tool, 2) the Proponent Registry tool, 3) CM visit tool (Android app), and 4) the Decibel Sound level Metre.
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Source: ARAP (FIAPP Component) Final Project Report



KRA 3

Indicators with targets	Baselines	2017/2020 value
<p>R3 -1: By 2020, increase of 50% of corruption related complaints processed by CHRAJ.</p> <p>R3 -2: By 2020, increased number of police misconduct cases resolved vis a vis the number of police misconduct cases received.</p> <p>R3 -3: No. of convictions for corruption offences initiated by Police Prosecutors.</p> <p>R3 -4: No. of successful asset forfeiture applications by OAG and EOCO.</p> <p>R3 -5: No. of environmental crimes registered at prosecution offices by late 2020.</p> <p>R3 -6: No. of environmental crimes sent to court by the trained prosecutors by late 2020.</p> <p>R3 -7: Nr of a) corruption cases (Fraud, Misappropriation/withholding of exhibits, and Extortion) and b) environmental cases heard (or adjudicated) by the judges trained by the project.</p> <p>R3 -8: By 2020, increase of 30% of corruption-related cases (Fraud, Misappropriation/withholding of exhibits, and Extortion) submitted to all PRCUs.</p> <p>R3 -9: By 2020, increase of reports on complaints prepared by PRCU evidencing corruption.</p> <p>R3 -10: By 2020, total increase of 30% of EG crimes prosecuted by AG.</p> <p>R3 -11: Nr. of ARAP-supported joint activities where institutions work together.</p> <p>R3 -12: Nr of ARAP-supported international events and peers meetings attended by AC institutions.</p> <p>R3 -13: Nr of ARAP-supported international institutions and networks with which AC institutions established relationships.</p>	<p>R3 -1: Baseline: 31 AC complaints in 2016.</p> <p>R3 -2: 942 cases in 2016</p> <p>R3 -3: TBD</p> <p>R3 -4: TBD</p> <p>R3 -5: TBD</p> <p>R3 -6: TBD</p> <p>R3 -7: TBD</p> <p>R3 -8: Baseline 0</p> <p>R3 -9: Baseline 0</p> <p>R3 -10: TBD</p> <p>R3 -11: 0</p> <p>R3 -12: 0</p> <p>R3 -13: 0</p>	<p>R3 -1: 2020 value is 148 cases, target of "50% increase" is exceeded.</p> <p>R3 -2: 2018 value-1709 received cases and 550 completed cases/ 2019 value: 1,379 received cases and 209 completed cases/ As of June 2020 value: 628 received cases and 218 completed cases. Nr of cases has decreased, target is missed.</p> <p>R3 -3: <i>Data not provided.</i></p> <p>R3 -4: Two cases Eugene Baffoe-Bonnie (\$3 million), and Republic v. Gibson Dan Azubike (\$190000). Good progress.</p> <p>R3 -5: 220 EG cases in 2019 and 2020. Progress made.</p> <p>R3 -6: 43 EG cases sent to court other cases still under investigation pending prosecution. Good progress.</p> <p>R3 -7: According to JS total is 96 cases (7 Fraud, 81 Mis-appropriation, and 8 extortion). No Env. Gov. prosecution.</p> <p>R3 -8: <i>The data of corruption-cases (R3 17) is not diss-aggregated for those submitted to PRCUs.</i></p> <p>R3 -9: JS reports only 9 reports on complaints prepared by PRCU evidencing corruption. Partially achieved.</p> <p>R3 -10: 43 cases</p> <p>R3 -11: 8 Activities: 1) Public Education Working Group, 2) MoU between JS and CLR, and 5 National Dialogues.</p> <p>R3 -12: Seven events and peer meetings.</p> <p>R3 -13: Nine institutions/networks</p>

Source: ARAP (FIIAPP Component) Final Project Report



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